

17 October 2016

<b>Committee</b>	Council
<b>Date</b>	Tuesday, 25 October 2016
<b>Time of Meeting</b>	6:00 pm
<b>Venue</b>	Council Chamber

**ALL MEMBERS OF THE COUNCIL ARE REQUESTED TO ATTEND**



**for Sara J Freckleton  
Borough Solicitor**

<b>Agenda</b>
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- 1. APOLOGIES FOR ABSENCE**
- 2. DECLARATIONS OF INTEREST**

Pursuant to the adoption by the Council on 26 June 2012 of the Tewkesbury Borough Council Code of Conduct, effective from 1 July 2012, as set out in Minute No. CL.34, Members are invited to declare any interest they may have in the business set out on the Agenda to which the approved Code applies.



**3. ANNOUNCEMENTS**

1. When the continuous alarm sounds you must evacuate the building by the nearest available fire exit. Members and visitors should proceed to the visitors' car park at the front of the building and await further instructions (staff should proceed to their usual assembly point). Please do not re-enter the building unless instructed to do so.

In the event of a fire any person with a disability should be assisted in leaving the building.

2. To receive any announcements from the Chairman of the Meeting and/or the Chief Executive.

**4. JOINT CORE STRATEGY - MAIN MODIFICATIONS**

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To consider the Joint Core Strategy Main Modifications.

**5. SEPARATE BUSINESS**

The Chairman will move the adoption of the following resolution:

That under Section 100(A)(4) Local Government Act 1972, the public be excluded for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part 1 of Schedule 12A of the Act.

**6. LEGAL PROCEEDINGS**

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*(Exempt –Paragraph 5 of Part 1 of Schedule 12A of the Local Government Act 1972 –Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings)*

To receive a report from the Borough Solicitor to enable the Council to determine a response to legal proceedings.

**Recording of Meetings**

Please be aware that the proceedings of this meeting may be recorded and this may include recording of persons seated in the public gallery or speaking at the meeting. Please notify the Democratic Services Officer if you have any objections to this practice and the Mayor will take reasonable steps to ensure that any request not to be recorded is complied with.

Any recording must take place in such a way as to ensure that the view of Councillors, Officers, the public and press is not obstructed. The use of flash photography and/or additional lighting will not be allowed unless this has been discussed and agreed in advance of the meeting.

## TEWKESBURY BOROUGH COUNCIL

<b>Report to:</b>	Council (Extraordinary)
<b>Date of Meeting:</b>	25 October 2016
<b>Subject:</b>	Joint Core Strategy: Main Modifications
<b>Report of:</b>	Julie Wood, Head of Development Services
<b>Corporate Lead:</b>	Mike Dawson, Chief Executive
<b>Lead Member:</b>	Councillor D M M Davies
<b>Number of Appendices:</b>	Seven

### **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.

Since submission of the JCS in November 2014 the Inspector has undertaken a detailed examination of the June 2014 Pre-Submission JCS as it was agreed by the three Councils. In June this year the Councils met to note the Interim Report of the Inspector, and the key points for change she identified through it. The overview of her findings were presented to that meeting as Appendix A and the minutes of that meeting are available here:

<http://minutes.tewkesbury.gov.uk/ieListDocuments.aspx?CId=256&MId=2367&Ver=4>

The purpose of this report is to:

- Update Members regarding progress on the JCS after the Council meetings in June 2016, which were followed by hearings in July and the Inspector's Note of Recommendations made at the hearing session on 21 July 2016 (dated 25 July 2016).
- Advise Members about the work undertaken to address the conclusions and recommendations of the Inspector regarding the June 2014 Pre-Submission JCS.
- Seek approval of the 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.
- Advise Council of the next steps in the JCS process, including arrangements for consultation about the Proposed Main Modifications.
- To identify key evidence and supporting documents which are related to the recommended Proposed Main Modifications

Leaders of the JCS authorities on 19 September 2016 and the Chief Executive of Tewkesbury Borough Council, as Chair of the JCS Strategic Issues Board, on 23 September 2016 each wrote to the Inspector on outstanding key issues of concern, in particular 5% affordable housing uplift, allocation of Twigworth and Fiddington. The Inspector responded on 6 October 2016, her response provided is at Appendix 3.

Council should note that supporting evidence, Examination Documents, Background Papers, Maps and the full 'track changes' version of the JCS associated with the Proposed Main Modifications are available electronically from the JCS website at: [www.gct-jcs.org](http://www.gct-jcs.org)

This main modification report is also being considered by Cheltenham Borough Council on Tuesday 18 October and Gloucester City Council on Monday 24 October.

The Council is being asked to approve the proposed modifications as detailed within Appendix 1 – these being the changes the JCS Councils consider make the plan sound and capable of adoption. These 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 to:**

- (1) 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 1 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) delegate authority to the Chief Executive of Tewkesbury Borough Council, the Corporate Director of Services and Neighbourhoods of Gloucester City Council and the Director of Planning of Cheltenham Borough Council in consultation with the relevant Leaders of each those Councils 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, including any minor changes arising from the consideration of the proposed modifications by each of the Joint Core Strategy Councils, prior to publication for consultation purposes.**
- (3) agree that Appendix Ai "Indicative Site Layout - Twigworth urban extension", Appendix Aii "the City of Gloucester Proposed Primary Shopping Area, Primary Frontage and Secondary Frontage" and Appendix B "Superseded Development Plan Policies on Adoption of the JCS" be incorporated into the proposed Main Modifications to the June 2014 Pre-Submission Gloucester, Cheltenham and Tewkesbury Joint Core Strategy as set out in Appendix 1 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.**
- (4) delegate authority to the Chief Executive of Tewkesbury Borough Council, in consultation with the Leader of Tewkesbury Borough Council, to progress and sign the 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 section 2 below.

**Resource Implications:**

See section 6 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 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 now within her Interim Report dated 26 May 2016.

The Inspector is therefore indicating that she would not be able to recommend that the June 2014 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.

If the proposed modifications as detailed within Appendix 1 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 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 the 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.

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**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 on New Homes Bonus indicates that there is 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. In addition, a written statement by the Housing and 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 between November 2016 and January 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. A Sustainability Assessment Addendum is included within the appendices of this report.

**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-ics.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 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** In the Inspector's Note of Recommendations, she requested that Main Modifications be made available for her by Monday 19 September 2016 for checking.
- 1.5** Consequently, the JCS officer team has formulated the Proposed Main Modifications 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.
- 1.6** It should be noted that the Inspector is only required to be concerned with matters associated with the soundness of the JCS and not with simply trying to improve the emerging plan. It can therefore be assumed that where Main Modifications are recommended these are required to make the Plan sound.
- 1.7** The Proposed Main Modifications formulated following the July 2016 hearings are set out in Appendix 1 to this report and are discussed in Section 2 below. If approved, consultation on the Main Modifications can take place between November 2016 and January 2017, meeting the expectation that main modifications consultations will follow the statutory requirements in respect of Pre-Submission consultation of 'at least six weeks'. The Inspector will receive the full responses to this consultation and consider them in January 2017. The Inspector has already confirmed that further hearings on the main modifications will take place after the public consultation.

**1.8** Leaders of the JCS authorities on 19 September 2016 and the Chief Executive of Tewkesbury Borough Council, as Chair of the JCS Strategic Issues Board, on 23 September 2016 each wrote to the Inspector on outstanding key issues of concern, in particular 5% affordable housing uplift and the allocations at Twigworth and Fiddington. The Inspector responded on 6 October 2016, her response provided is at Appendix 3, the implications arising are set out in Section 2 below.

## **2.0 PROPOSED MAIN MODIFICATIONS**

**2.1** To advance the JCS, the Councils will need to approve the proposed main modifications which 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.

**2.2** A large number of changes are proposed through the main modifications and are set out in Appendix 1. However some key points have been drawn out below for particular consideration.

**2.3** **The overall housing requirement of 35,175 dwellings between 2011 and 2031 in the JCS area (including a 5% uplift to boost affordable housing delivery and flexibility in housing supply).** Although the Leaders of the JCS authorities have written to the Inspector regarding the Inspector's recommendations on this 5% uplift, the Inspector has not revised her view that the housing requirement should be composed of:

- i. a demographic component (31,830) which comprises the natural growth of the population in the population and household projections, **plus**
- ii. an economic uplift of an additional 1,670 dwellings (which would bring the figure to 33,500) to reflect increased housing need to accommodate the increased number of jobs (39,500) being planned for in the JCS area (estimates in the total number of dwellings required to accommodate this number of jobs ranged from 31,200 to 36,600); **plus**
- iii. a 5% uplift to the above to increase affordable housing delivery and flexibility in housing supply - this gives an overall figure of 35,175 dwellings for the JCS area.

**2.4** This splits into the following housing needs figures for each authority across the plan period:

Gloucester: 14,359

Cheltenham: 10,917

Tewkesbury: 9,899

**2.5** Officers have presented evidence on a number of occasions to progress the question of the justification of the 5% uplift. The Inspector's Interim Report (EXAM 232) states that, based on evidence of viability and affordable housing delivery, the proportion of affordable housing that is deliverable through market housing schemes will not meet the full affordable housing need. As such, the Inspector has sought to increase the housing requirement (demographic OAN plus economic uplift) by a further 5% to help deliver the required number of affordable homes. Officers provided an additional note to the Inspector dated 15<sup>th</sup> July 2016 (EXAM 249) <http://www.gct-jcs.org/Documents/Examination-Documents-Library-7/EXAM-249---JCS-Affordable-Housing-5-Uplift-Note.pdf> to reinforce the JCS authorities' view that the application of the 5% uplift was arbitrary, that its deliverability of additional affordable housing units was uncertain and would result in further pressure to effectively meet the OAN of the JCS.



- 2.6 In responding to the request from JCS Leaders to reconsider the 5% uplift, the Inspector in her letter dated 6 October 2016 states “I have recommended a 5% uplift on the objectively assessed housing need based on the evidence before me and national planning policy and guidance.”
- 2.7 There is no further new evidence which Officers are in a position to present to a future hearing session; as such are of the view that the 5% affordable housing uplift set out by the Inspector is a matter of soundness and should be included within the proposed modifications.
- 2.8 **The North West Cheltenham Strategic Allocation is reduced in capacity to 4,285 dwellings in the JCS as part of the Main Modifications.** The Inspector recommends that a green buffer should remain around the village of Swindon. As a result the buffer would displace housing which would reduce the capacity of the site by 500 units to 4,285.
- 2.9 **The Leckhampton Strategic Allocation is removed from the JCS as part of the Main Modifications.** Following detailed debate on landscape sensitivity and provision of local green space, the Inspector recommends an area be considered for build development which is thought to be too small to carry a development of strategic scale. The area will be reconsidered for local scale development (below 450 units) as part of the Cheltenham Plan. The Inspector accepts that a future traffic scheme for the site may be acceptable, but recommends that built development be contained within the green areas of the landscape and visual sensitivity plan (to the north of the site). The green area referred to can be found in the examination library at EBLO106 and is available to view here: <http://www.gct-ics.org/Documents/EvidenceBase/Appendix-4.pdf>. An indicative 200 units has been included within the district capacity figure for Cheltenham Borough recognising the deliverability of part of this site.
- 2.10 **Leckhampton Farm Lane Planning Permission has been accorded to Cheltenham Borough Council’s housing numbers (377 dwellings).** Whilst the Inspector is minded that the allocation of the Farm Lane site (which is within Tewkesbury Borough’s administrative boundary) is not sound in the JCS, she has noted that there is an extant planning permission and that this can be accorded to Cheltenham supply figures, should Tewkesbury Borough Council and Cheltenham Borough Council agree. The planning permission is currently subject to legal challenge.
- 2.11 **A 1,100 dwelling and 45ha employment land strategic allocation at West Cheltenham (Phase 1) is introduced into the Plan through the Main Modifications.** Strategic allocation options have been considered through the plan making process in this area since the Broad Locations report in 2011, and allocation options were considered in 2013; the Hayden Sewage Treatment plant which forms part of the site and emits odour curtailed further development of the allocation at that time. Severn Trent is now working with the Council on measures to improve odour emissions, which when undertaken will release parts of the site for development. The latest statement of common ground outlining these measures and the emerging masterplan for the area is at EXAM 198 and is available to view here: <http://www.gct-ics.org/Documents/Examination-Documents-Library-4/EXAM-198---Revised-SoCG---Land-at-Hayden-February-16.pdf>. A priority for this proposed allocation is ensuring effective masterplanning of phase 1 and a future phase 2.
- 2.12 **West Cheltenham Safeguarded Land (phase 2) remains within the Plan.** The Inspector in her ‘Note of Recommendations’ identifies that the bar has been reached in demonstrating exceptional circumstances for the removal of this land from the Green Belt, to be safeguarded for future development of the West Cheltenham area in a future Plan review. This will be an important future growth direction for the town, and contains the Hayden Sewage Treatment works.

- 2.13 North Churchdown Strategic Allocation has been removed from the Plan.** The Inspector has been consistent in her opinion from her Preliminary Findings that this strategic allocation is unsound, due largely to its impact on the strategic Green Belt gap between Gloucester and Cheltenham. This view continued throughout the recent sessions and therefore the site has been removed from the Plan
- 2.14 Twigworth Strategic Allocation is in the Plan for 1,363 dwellings introduced through the Main Modifications to the plan.** The Inspector recommended within her Interim Report that a site at Twigworth should be allocated for housing-led development of at least 750 dwellings, with further capacity to be investigated by the JCS authorities. Within the Note of Recommendations the Inspector states that from feedback she received on the Interim Report that there may be scope for a strategic allocation at Twigworth and that further work aimed at allocating it within the JCS would be carried out.
- 2.15 Fiddington Strategic Allocation has not been included within the Plan.** The Inspector recommended within her Interim Report that land at Fiddington be allocated for 900 dwellings. Within the Note of Recommendations the Inspector states that from feedback she received on the Interim Report that there may be scope for a strategic allocation at Fiddington and that further work aimed at allocating it within the JCS would be carried out.
- 2.16** The Chief Executive of Tewkesbury Borough Council, as the Chair of JCS Strategy Issues Board, wrote to the Inspector on 23 September 2016 to raise deliverability concerns in respect of the Fiddington site, in the response, dated 6 October 2016 the Inspector states “reasons for omitting Fiddington should be sound and properly evidenced”. This site is not being proposed as a main modification to the plan. The evidence to support this decision is rooted in the on-going transport modelling work, mitigation options relating to the transport issues on the A46 and M5 Junction 9 have been tested and these raise deliverability concerns with this allocation. This specifically concerns the highway infrastructure needs and improvements that will be required along this corridor in order to deliver future growth in the Ashchurch area and beyond through Worcestershire and Warwickshire. Due to this uncertainty, it is not considered appropriate to allocate the site through the JCS at this time and to reconsider options for development through future plan review when more is known about the infrastructure needs of the A46. Officers are of the view that reserve site status is an appropriate mechanism to manage future release of the Fiddington site should the position be progressed by the Inspector through the next stage of the examination.
- 2.17 Land at Mitton, to the north of Tewkesbury is not a JCS strategic allocation as it is within the Wychavon District Council area, however a planning statement has been prepared between Wychavon and Tewkesbury regarding meeting the housing requirements of Tewkesbury Borough.** The Inspector recommended that the JCS authorities engage in constructive discussions with Wychavon District Council with a view to seeking agreement on the release of land at Mitton to contribute towards Tewkesbury Borough’s housing requirement. As a result the authorities have jointly prepared a 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. 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.
- 2.18 Winnycroft, to the south east of the Gloucester city area has been added as a strategic allocation to the JCS.** This site is not located in the Green Belt, and has been included within the Gloucester residential capacity estimates for some time. The allocation encompasses the location of two adjacent outline planning applications for residential development which together have an estimated capacity of 620 dwellings between the two sites.

- 2.19 Apportionment of Strategic Allocations to support relevant five year housing land supplies.** In the submission JCS, a sharing mechanism to support five year housing supply was set up to ensure that strategic allocations wholly or partly within Tewkesbury Borough could be used to meet demand in Cheltenham and Gloucester, but without explicitly setting out which sites meet which demands. The Inspector found that this mechanism was overly complex and uncertain. She therefore has recommended that in accordance with the spatial strategy, housing numbers from Strategic Allocations where they are adjacent to either Cheltenham or Gloucester should be accorded only to that Borough or City in supply terms. However, Ashchurch should be wholly for Tewkesbury's needs.
- 2.20 Stepped Trajectories.** The Inspector has confirmed that stepped trajectories may soundly be used in the JCS implementation strategy subject to robust justification. This means that for Cheltenham, where early on in the plan period completions are lower because strategic allocations have not yet started delivering, the housing target for those years can be reduced. This results in a higher target in later years, but this higher target can be met because by that time strategic allocations will be fully delivering. For more information on the JCS housing trajectories (see the JCS Housing Implementation Strategy as on the JCS website).
- 2.21 Employment Provision has increased to support around 39,500 jobs across the plan period, with a requirement for at least 192ha of B class land.** Through the submissions of industry through the examination and the work of aligning the JCS with the Gloucestershire Strategic Economic Plan (SEP), figures on job requirements and employment land needs have increased. The 'Employment Land Assessment Update October 2015' report by NLP for the JCS authorities concluded that there should be a minimum requirement for B class employment land of 192 hectares, this is an increase from 64 ha of employment land in the June 2014 version of the Plan. The Inspector's interim report recommended that the higher jobs target be adopted to ensure that the Plan fully adopts an economically led approach to objectively assessed need. This is an increase from provision 'for about 28,000 jobs' in the Pre-Submission JCS.
- 2.22 The strategic allocations being proposed through the Main Modifications would bring the total supply in the JCS area to 33,582 dwellings.** This would leave a shortfall against the total housing requirement at Tewkesbury of 729 dwellings and Gloucester of 945 dwellings, for both Councils approximately 1.5 years supply. However, this shortfall occurs at the end of the plan period and both areas would have a good supply of housing land for the short to medium term. This will allow adequate time for a future review of the plan to explore further the potential for additional sites to meet the needs 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.
- 2.23 The JCS Vision and Objectives** contains further text explaining the spatial strategy, provision of high speed broadband is now included within the objectives, in line with the Inspector's recommended modifications, and the sections on sustainable travel and healthy communities have been expanded.
- 2.24 Policy SD1 "Presumption in favour of sustainable development"** has now been replaced by national policy and guidance, and so has been deleted on the recommendation of the Inspector.
- 2.25 Policy SD2 "Employment"** now prioritises B class uses on employment land at Strategic Allocation. It contains more detailed explanation text regarding alignment with the Gloucestershire Strategic Economic Plan, and priority sectors for growth and expands and reinforces support for the Cheltenham Racecourse, Staverton Airport, University of Gloucestershire and tourism and recreation.

- 2.26 Policy SD3 “Retail”** looks to the saved policies on retail in the saved Tewkesbury and Cheltenham Plans, but contains shopping frontages policy for Gloucester City. Through the course of the examination and in within the Interim Report the Inspector has required an immediate review of retail policy in the JCS, which will need to be undertaken as soon as the JCS is adopted.
- 2.27 Policy SD4 “Sustainable Design and Construction”** removes the requirement for major applications to gain 10% of their energy needs from renewable sources near the development. These requirements are no longer supported by national policy and guidance.
- 2.28 SD5 “Design”** is a comprehensive design policy and has not changed significantly since the submission version of the JCS.
- 2.29 SD6 “Green Belt”**, after detailed debate and legal opinion in the examination on the question of the role of district plans in Green Belt changes, this policy has been amended to allow for ‘limited’ green belt review to accommodate local site needs where required and exceptional circumstances exist. The Green Belt policy has been subject to a number of smaller amendments related to existing developed sites in the Green Belt, such as an expansion to the Cheltenham Racecourse Policy Area, and changes to the wording of policy on the sewage treatment works odour zone, in line with evidence contained in the statements of common ground referenced at paragraph 2.7 of this report. In addition a safeguarded area at Twigworth adjacent to the proposed strategic allocation is identified.
- 2.30 SD7 – 12**, these are development management policies, which have been amended slightly to take into account recommendations from the Inspector, including expanding how Gypsy Traveller and Travelling Show-people are supported.
- 2.31 SD13 Affordable Housing** – a number of changes have been made in light of government guidance on affordable housing thresholds and the latest CIL viability evidence. The changes include a 35% affordable housing proposal on strategic allocations, sites 10 and under at 0% affordable housing, and sites of 11 and over at 20% affordable housing for Gloucester and 40% affordable housing for Cheltenham and Tewkesbury.
- 2.32 SD14 Gypsy Traveller and Travelling Show-people** - policy amended to reflect latest guidance contained in the Government’s policy for traveller sites as well as an updated assessment of needs.
- 2.33 INF1 and INF2** – updated to only 1 policy to eliminate duplication identified through hearing discussion with the highways authorities.
- 2.34 INF6 Renewable Energy** – updated to move the issue of windfarm allocations to district plans and removal of the 10% on-site energy generation to reflect latest national guidance.
- 2.35 Strategic Allocation policies** are updated as outlined above and individual sites policies have been added to provide detailed guidance for each allocation. SA1 policy updated to provide greater clarity on the masterplanning and infrastructure needs for each site.
- 2.36 Part 7 Delivery, Monitoring and Review** – updated to include trajectory and five year housing supply information, review mechanism and reference to the devolution process.
- 2.37 Maps** – changed accordingly to reflect sites and Green Belt changes.

### **3.0 CONSULTATION**

- 3.1** 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.
- 3.2** 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.
- 3.3** 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. Some Cheltenham Members (as Members of Parish Councils/other bodies) have played an active role in the examination sessions. Those who responded to the Pre-Submission consultation have, been able to submit evidence to the examination and appear at hearing sessions.
- 3.4** The JCS Member Steering Group has reviewed the proposed modifications and their justification together with direct engagement with the Leaders of the JCS authorities. Progress of the JCS examination has been reported regularly to the Planning and Liaison Member Working Group.
- 3.5** Council approval is sought on the Main Modifications plan for it to undergo a formal public consultation period expected to take place between November 2016 and January 2017.

### **4.0 RELEVANT COUNCIL POLICIES/STRATEGIES**

- 4.1** Tewkesbury Borough Council Plan 2016-2020.

### **5.0 RELEVANT GOVERNMENT POLICIES**

- 5.1** 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.

### **6.0 RESOURCE IMPLICATIONS (Human/Property)**

- 6.1** 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 response, attending and giving evidence at hearing sessions and any additional work on the plan and its evidence base as the examination progresses.

**7.0 SUSTAINABILITY IMPLICATIONS (Social/Community Safety/Cultural/ Economic/ Environment)**

7.1 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.

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

8.1 None.

**9.0 RELATED DECISIONS AND ANY OTHER RELEVANT FACTS**

9.1 None.

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**Background Papers:** None.

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**Appendices:**

- 1: Table of Proposed Main Modifications.
  - 1A: Maps.
    - 1Ai: Indicative Site Layout - Twigworth Urban Extension.
    - 1Aii: The City of Gloucester Proposed Primary Shopping Area, Primary Frontage and Secondary Frontage.
  - 1B: Superseded Development Plan Policies on Adoption of the JCS.
- 2: Sustainability Appraisal (Integrated) Addendum.
- 3: Inspector's letter dated 6 October 2016.

## 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 <i>new text to be added is in red and italics.</i>  Text that remains in black is not changed from the Pre-Submission version.  E.g.  <del>Housing</del> <i>Employment</i> led development is expected to generate <del>minimal</del> <i>substantial</i> growth  <b>NOTE PARAGRAPH NUMBERING IS NOT CORRECT DUE TO DELETIONS/ADDITIONS</b>	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	<b><i>The Gloucester City Vision 2012-2022</i></b> Gloucester will be a flourishing, modern and ambitious City, which all residents can enjoy. <i>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.</i>	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, <i>including a new bus station</i> . 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. <del>to meet the needs of all three authorities.</del>	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 <del>(such as cycling or buses)</del> is easier to achieve in the major urban areas which are	



## JCS Table of Main Modifications

15

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p>compact and thus offer potential for improvements <i>to public transport</i>, local cycling and pedestrian links. However, in the rural areas, maintaining and improving public transport is more challenging.</p> <p><i>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.</i></p> <p><i>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.</i></p>	<p>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.</p>
PMM005	Strategic Objective 1 new bullet point	<p><b>Ambition 1 – a thriving economy</b>  <b>Strategic Objective 1 – Building a strong and competitive urban economy</b></p> <ul style="list-style-type: none"> <li><i>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</i></li> </ul>	<p>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</p>



**JCS Table of Main Modifications**

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<ul style="list-style-type: none"> <li>• <i>Improving existing and</i> providing <i>new</i> frequent public transport links and safe walking and cycling routes in all new developments</li> <li>• Improving access to services in rural and urban areas through new development, improved integrated transport links and supporting local and community led transport initiatives <i>in the Local Transport Plan throughout the JCS area</i></li> <li>• <i>Promoting bus priority on key public transport corridors identified in the Local Transport Plan throughout the JCS area.</i></li> </ul> <p><b>Strategic Objective 8 – Delivering a wide choice of quality</b></p> <ul style="list-style-type: none"> <li>• Delivering, <i>at least</i>, a sufficient number of market and affordable housing <i>houses</i></li> </ul> <p><b>Strategic Objective 9 – Promoting healthy communities</b></p> <ul style="list-style-type: none"> <li>• In partnership with others, creating stronger communities by reducing inequality and social exclusion, <i>enhancing opportunities for high quality education</i>, and thereby increasing social well-being</li> <li>• In partnership with others, encouraging healthy lifestyles and a well society through access to key community facilities and services, <i>including sport, recreation and leisure facilities</i>, open spaces and sustainable transport, <i>including public transport.</i></li> </ul>	<p>Strategic Objective 8, clarifying that housing provision is “at least” in accordance with NPPFs requirement to provide a wide choice of high quality homes.</p> <p>Objective 9, additional text further emphasising the role of education, sport and public transport in promoting healthy communities.</p>
PMM008	3.1.1	<b>PART 3 - <i>The JCS Spatial Strategy</i> Strategic Policies</b>	Title change to reflect that all policies in the plan are strategic and this policy

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p>This part sets out key <del>strategic</del> spatial policies for the JCS area. Policy SP1 sets out the overall strategy 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.</p>	<p>sets out the spatial strategy for development.</p>
PMM009	3.1.5	<p><del>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.</del></p>	<p>Text deleted and updated position on OAN is presented in the explanatory text.</p>
PMM010	3.1.6	<p>The plan must be based on up-to-date evidence. The OAN for the JCS has been independently assessed by consultants Nathaniel Lichfield &amp; 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 <b>33,500</b> within a range of about 30,500 to 38,000 dwellings <b>and a minimum of 192 hectares of B-class employment land to support approximately 39,500 new jobs</b> <del>about 21,000 to 28,000 jobs</del>. This level of development would reflect both demographic and economic projections <b>and aspirations</b>, and is considered to be a sensible assessment of both the future housing needs <del>of the area</del> and the economic potential of the JCS area. <del>to make a partial return to household formation trends that existed before the recession.</del></p> <p><i>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.</i></p>	<p>To update position on evidence for OAN and employment land and job growth.</p> <p>To include 5% uplift to OAN for affordable housing and flexibility.</p>

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
PMM011	3.1.7	The CCHPR has also examined alternative scenarios and further detail of this work is included in the JCS 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.	Updated position on OAN calculation is presented in the explanatory text.
PMM012	3.1.7	<i>The requirements set out in Policy SP1 reflect the evidence and take into account the following key issues:</i> <ul style="list-style-type: none"> <li>• <i>Population growth and changing household size</i></li> <li>• <i>The effect of, and prospects for, economic growth</i></li> <li>• <i>The dynamics of the local housing market</i></li> <li>• <i>Landscape and environmental constraints</i></li> <li>• <i>Infrastructure capacity and deliverability</i></li> <li>• <i>Role and function of the Green Belt</i></li> <li>• <i>The Duty to Co-operate across local authority boundaries.</i></li> </ul>	Paragraph moved from the delivery section of Policy SP1.
PMM013	Policy SP1 – The Need for New Development	<p><b>Policy SP1: The Need for New Development</b></p> <ol style="list-style-type: none"> <li>1. During the plan period, provision will be made to meet the need for <del>approximately about 30,500</del> <b>35,175</b> new homes and <i>a minimum of 192 hectares of B-class employment</i> land to support <del>approximately about 28,000</del> <b>39,500</b> new jobs.</li> <li>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.</li> <li>3. This housing requirement for each local authority will be as follows:           <ul style="list-style-type: none"> <li>• Gloucester <del>11,300</del> <b>at least 14,359</b> new homes</li> <li>• Cheltenham <del>9,100</del> <b>at least 10,917</b> new homes</li> <li>• Tewkesbury <del>10,100</del> <b>at least 9,899</b> new homes</li> </ul> </li> </ol>	<p>(1) Housing and employment figures updated. Policy clarifies B class employment land requirement.</p> <p>(3) Updated housing requirement for each district.</p> <p>(deleted 3) Policy point removed from SP1 and moved to the Delivery, Monitoring and Review section which provides</p>

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p><del>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.</del></p> <p>This policy contributes towards achieving Objectives 1, 2, 3, 6, 7 and 8.</p>	greater detail on the review mechanism.
PMM014	3.1.8 3.1.9	<p><del>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.</del></p> <p>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.</p>	Text deleted and updated position on OAN presented in explanatory text.
PMM015	3.1.8 3.1.9	<p><i>The assessment of the OAN for housing follows the approach indicated by the NPPF and the PPG and 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.</i></p> <p><b>Table SP1a Demographic housing needs in the JCS area</b></p>	Explanatory text updated to set out latest evidence behind demographic-based OAN.

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason										
		<table border="1" data-bbox="577 400 1473 552"> <thead> <tr> <th></th> <th><i>Gloucester</i></th> <th><i>Cheltenham</i></th> <th><i>Tewkesbury</i></th> <th><i>JCS</i></th> </tr> </thead> <tbody> <tr> <td><i>Demographic OAN 2011-31</i></td> <td><i>13,290</i></td> <td><i>9,900</i></td> <td><i>8,640</i></td> <td><i>31,830</i></td> </tr> </tbody> </table> <p data-bbox="577 587 1731 683"><i>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.</i></p>		<i>Gloucester</i>	<i>Cheltenham</i>	<i>Tewkesbury</i>	<i>JCS</i>	<i>Demographic OAN 2011-31</i>	<i>13,290</i>	<i>9,900</i>	<i>8,640</i>	<i>31,830</i>	
	<i>Gloucester</i>	<i>Cheltenham</i>	<i>Tewkesbury</i>	<i>JCS</i>									
<i>Demographic OAN 2011-31</i>	<i>13,290</i>	<i>9,900</i>	<i>8,640</i>	<i>31,830</i>									
PMM016	3.1.11 3.1.12	<p data-bbox="577 719 1731 1369">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 <i>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 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.</i> 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.</p>	Updated text to provide an overview of how the employment land and job aspirations were reached.										

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason										
		<p>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.</p>											
PMM017	3.1.11 3.1.12	<p><i>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.</i></p> <p><i>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.</i></p> <p><b>Table SP1b 'Policy-On' economic uplift OAN</b></p> <table border="1" data-bbox="577 1281 1525 1335"> <thead> <tr> <th></th> <th>Gloucester</th> <th>Cheltenham</th> <th>Tewkesbury</th> <th>JCS</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>		Gloucester	Cheltenham	Tewkesbury	JCS						<p>New text to provide an overview of how the OAN has taken into account the economic growth needs of the area.</p> <p>Text to explain how the economic uplift to the OAN has been distributed.</p>
	Gloucester	Cheltenham	Tewkesbury	JCS									



## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason										
		<table border="1"> <tr> <td><i>Policy-on OAN 2011-31</i></td> <td><i>13,675</i></td> <td><i>10,395</i></td> <td><i>9,425</i></td> <td><i>33,500</i></td> </tr> </table> <p><i>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 growth in the area is not constrained by the supply of housing.</i></p>	<i>Policy-on OAN 2011-31</i>	<i>13,675</i>	<i>10,395</i>	<i>9,425</i>	<i>33,500</i>						
<i>Policy-on OAN 2011-31</i>	<i>13,675</i>	<i>10,395</i>	<i>9,425</i>	<i>33,500</i>									
	3.1.7	<p><i>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.</i></p> <p><b>Table SP1c 'Policy-On' OAN with 5% Uplift</b></p> <table border="1"> <thead> <tr> <th></th> <th><i>Gloucester</i></th> <th><i>Cheltenham</i></th> <th><i>Tewkesbury</i></th> <th><i>JCS</i></th> </tr> </thead> <tbody> <tr> <td><i>Policy-on OAN + 5% Uplift 2011-31</i></td> <td><i>14,359</i></td> <td><i>10,917</i></td> <td><i>9,899</i></td> <td><i>35,175</i></td> </tr> </tbody> </table>		<i>Gloucester</i>	<i>Cheltenham</i>	<i>Tewkesbury</i>	<i>JCS</i>	<i>Policy-on OAN + 5% Uplift 2011-31</i>	<i>14,359</i>	<i>10,917</i>	<i>9,899</i>	<i>35,175</i>	Text to explain the application of an addition 5% uplift to the OAN for affordable housing and flexibility.
	<i>Gloucester</i>	<i>Cheltenham</i>	<i>Tewkesbury</i>	<i>JCS</i>									
<i>Policy-on OAN + 5% Uplift 2011-31</i>	<i>14,359</i>	<i>10,917</i>	<i>9,899</i>	<i>35,175</i>									
PMM018	3.1.14 3.1.15 3.1.16	<p><b><i>Delivery</i></b></p> <p><i>The JCS plans for a significant level of housing and employment development to meet the needs of the area over the plan period. This 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. 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.</i></p>	Text deleted in relation to oversupply against the housing requirement. Further explanation provided in Policy SP2.  Summary explanation of the role of different sites										

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason									
		<table border="1" data-bbox="582 427 1547 603"> <thead> <tr> <th colspan="2" data-bbox="582 427 1131 507">Annual JCS Housing Delivery</th> <th data-bbox="1137 427 1547 507">Annual JCS Housing Requirement</th> </tr> <tr> <th data-bbox="582 507 851 555">1991-2001</th> <th data-bbox="857 507 1131 555">2001-2011</th> <th data-bbox="1137 507 1547 555">2011-2031</th> </tr> </thead> <tbody> <tr> <td data-bbox="582 555 851 603">1326</td> <td data-bbox="857 555 1131 603">1450</td> <td data-bbox="1137 555 1547 603"><del>1525</del> 1759</td> </tr> </tbody> </table> <p data-bbox="582 639 1724 863"><i>Policy SP2 provides the spatial strategy how development will be distributed and delivered across the JCS 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.</i></p> <p data-bbox="582 903 1715 930"><i>The requirements set out in Policy SP1 reflect the evidence and take into account the following key issues:</i></p> <ul data-bbox="582 970 1299 1193" style="list-style-type: none"> <li><del>• Population growth and changing household size</del></li> <li><del>• The effect of, and prospects for, economic growth</del></li> <li><del>• The dynamics of the local housing market</del></li> <li><del>• Landscape and environmental constraints</del></li> <li><del>• Infrastructure capacity and deliverability</del></li> <li><del>• Role and function of the Green Belt</del></li> <li><del>• The Duty to Co-operate across local authority boundaries.</del></li> </ul> <p data-bbox="582 1233 672 1257"><i>Delivery</i></p> <p data-bbox="582 1297 1720 1382">To assess the performance of the JCS, <i>including delivery against the OAN</i>, 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.</p>	Annual JCS Housing Delivery		Annual JCS Housing Requirement	1991-2001	2001-2011	2011-2031	1326	1450	<del>1525</del> 1759	<p data-bbox="1738 400 2047 459">and plans in meeting development needs.</p> <p data-bbox="1738 499 2047 751">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.</p>
Annual JCS Housing Delivery		Annual JCS Housing Requirement										
1991-2001	2001-2011	2011-2031										
1326	1450	<del>1525</del> 1759										

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		<p>The <i>monitoring arrangements set out in the Delivery, Monitoring and Review section</i> <del>JCS authorities' monitoring reports (AMRs) will have a role in</del> <i>enable the JCS authorities to</i> identifying <i>how</i> where policies <i>and sites</i> are <del>not</del> delivering against the plan objectives and strategy as intended. The <i>monitoring</i> AMRs may also suggest courses of action to address <i>any</i> these issues. <del>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.</del> <i>Further details are provided within the Delivery, Monitoring and Review section.</i></p> <p><del>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.</del></p>	
PMM019	3.2.1 3.2.2 3.2.3	<p>Both the level and distribution of housing and employment is influenced by the vision of the JCS, and informed by sustainability principles and by the JCS Sustainability Appraisal process, which <del>must be</del> <i>has been</i> 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.</p> <p>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</p>	<p>Text to provide added detail on the Gloucestershire devolution bid.</p> <p>Explanatory text on the joint working with the South Worcestershire authorities.</p>

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		<p>wider memorandum of understanding is <del>currently being progressed</del> <i>maintained</i> between all Gloucestershire districts covering issues which require joint working. <i>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.</i> <del>In particular, the Gloucestershire authorities have worked together on an update of the Strategic Housing Market Assessment (SHMA).</del></p> <p>The JCS authorities have also specifically agreed with Stroud District Council to take a strategic approach in the review of their <del>respective</del> 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. <i>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.</i> Consideration will be given <i>to meeting unmet requirements from another local planning authority</i> <del>within</del> <i>and outside</i> the housing market area, where it is reasonable to do so and consistent with achieving sustainable development.</p>	
PMM020	Policy SP2: Distribution of New Development	<p><del><b>Policy SP2: Distribution of New Development</b></del></p> <p><del>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.</del></p> <p><del>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.</del></p> <ul style="list-style-type: none"> <li><del>• Gloucester and its urban extensions will accommodate about 11,943 new homes</del></li> <li><del>• Cheltenham and its urban extensions will accommodate about 10,720 new homes</del></li> <li><del>• Elsewhere within Tewkesbury Borough development will accommodate about 8,377 new homes</del></li> </ul>	(2) (3) (4) Policy updated with latest housing needs 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

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		<p><del>3. This will be met:</del></p> <ul style="list-style-type: none"> <li><del>• Through strategic allocations at Ashchurch</del></li> <li><del>• 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.</del></li> </ul> <p><del>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.</del></p> <p><del>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:</del></p> <ul style="list-style-type: none"> <li><del>• The rural service centres will accommodate 1860 new homes, and</del></li> <li><del>• The service villages will accommodate 752 new homes</del></li> </ul> <p><del>6. In the remainder of the rural area, Policy SD11 will apply.</del></p> <p><del>(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.)</del></p> <p><del>This policy contributes towards achieving Objectives 1, 2, 3, 4, 5, 6, 7, 8 and 9.</del></p> <p><b>Policy SP2: Distribution of New Development</b></p>	<p>planned through the JCS area.</p> <p>(6) Addition to clarify that reference to SD11 relates to residential development only.</p> <p>(7) Policy point updated to provide further clarification. Policy seeks for the unmet needs to be addressed through the plan making process through identified Strategic Allocations.</p> <p>(8) Additional policy point to address the role of plan review in identifying any further Strategic Allocations.</p> <p>(9) Update to provide latest requirement of employment land.</p>

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Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p><i>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.</i></p> <p><i>2. To meet the needs of Gloucester City the JCS will make provision for at least 14,359 new homes. At least 13,415 dwellings 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.</i></p> <p><i>3. To meet the needs of Cheltenham Borough the JCS will make provision for at least 10,917 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.</i></p> <p><i>4. To meet the needs of Tewkesbury Borough, outside of the urban extensions to Gloucester and Cheltenham, the JCS will make provisions for at least 9,899 new homes. At least 9,186 dwellings will be provided through existing commitments, the strategic allocation at MoD Ashchurch as defined in Policy SA1, 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.</i></p> <p><i>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:</i></p> <ul style="list-style-type: none"> <li><i>• The rural service centres will accommodate 1860 new homes, and</i></li> </ul>	

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Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<ul style="list-style-type: none"> <li>• <i>The service villages will accommodate 880 new homes</i></li> </ul> <p><i>6. In the remainder of the rural area, Policy SD11 will apply to proposals for residential development.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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 104 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 Plans.</i></p> <p><i>(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)</i></p>	
PMM021	3.2.5 3.2.6 3.2.7 3.2.8 3.2.9	<p><b>Explanation</b></p> <p>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.</p>	Amended to use latest terminology of Strategic Assessment of Land Availability.

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		<p>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<sup>4</sup> count towards meeting needs in the early part of the plan; secondly, sites which have already been granted planning permission, <i>including those that are</i> and are being built out; thirdly, allocated sites in existing adopted development plans. In addition, we have been informed by the <del>Strategic Housing Land Availability Assessment (SHLAA)</del> <i>Strategic Assessment of Land Availability (SALA)</i> process, although this does not consider all constraints which could prevent sites coming forward.</p> <p><del>We have made</del> <i>An</i> assumptions <i>has been made</i> 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.</p> <p>There are also further sites to be identified through the district plans. Work on the Gloucester <i>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.</i> <del>plan is already well advanced, Cheltenham and Tewkesbury Borough’s district level plans are less far forward in the plan preparation process and there is some uncertainty as to how many homes will 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 requirement identified need (19,689 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.</del></p> <p>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 <i>additional</i> land for at least 38% of <i>to meet</i> the JCS needs (<del>11,644 homes</del>). Hence, urban extensions to Gloucester and Cheltenham have been identified, together</p>	<p>Updated wording regarding the district plans.</p> <p>Figures for district capacity and strategic allocation supply updated with latest trajectory information.</p> <p>Text removed relating to uncertainty of district level plans as there is greater certainty due to further development of these plans.</p>



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		<p>with Strategic Allocations at Ashchurch (including a major brownfield site), to accommodate <del>the remaining</del> <i>approximately</i> 38% of <del>the housing requirement</del> <i>growth</i>. As concluded by the <i>Sustainability Appraisal</i>, 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 <a href="http://www.gct-jcs.org/EvidenceBase/">www.gct-jcs.org/EvidenceBase/</a></p>	
PMM022	3.2.10 3.2.11	<p><del>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 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.</del></p> <p><del>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.</del></p> <p><i>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</i></p>	<p>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.</p>

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		<p><i>of the site selection process is detailed through the Broad Locations Report (October 2011) and the Strategic Allocations Report (2013).</i></p> <p><i>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.</i></p> <p><i>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 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.</i></p> <p><i>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.</i></p>	
PMM023	3.2.12 3.2.13	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.	Update on the latest housing requirement and

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		<p><del>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.</del> <i>The total number of dwellings that is being provided for within the JCS area is approximately 33,582, 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.</i></p> <p><i>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 requirements to at least 2028/29. This will allow adequate time for a future 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.</i></p> <p><i>At Tewkesbury town there are similar issues with allocating strategic sites that are within the JCS when taking into account the significant constraints and availability of land around the urban area. This has necessitated 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. With an early phase of Mitton being delivered there would still remain a shortfall against the total OAN. However, Tewkesbury has an oversupply against its annual requirement from 2011 to 2016 and has a good</i></p>	<p>explanation that the JCS identifies development that is lower than this requirement.</p> <p>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.</p> <p>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.</p> <p>Reference to the Housing Implementation Strategy that will support the plan.</p>

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		<p><i>supply of housing land that will enable it to meet its requirements to at least 2026/27. A future review of the JCS would allow for any longer-term 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.</i></p> <p>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.</p> <p>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 <i>Housing Implementation Strategy</i> Background Paper, available on the JCS website.</p>	
PMM024	3.2.14 3.2.15 3.2.16 3.2.17 3.2.18 3.2.19 3.2.20	<p>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.</p> <p>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.</p> <p>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</p>	Explanatory text on the spatial strategy deleted and updated and abbreviated text has replaced it. This is to increase readability of the document.

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		<p><del>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.</del></p> <p><del>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.</del></p> <p><del>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.</del></p> <p><del>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.</del></p>	
PMM025	3.2.20	<p><i>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 104ha 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</i></p>	Updated explanation provided on the issue of employment land supply, including the role of Strategic Allocations and additional sites to be

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		<p><i>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.</i></p> <p><i>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.</i></p>	<p>identified through the district plans.</p> <p>Explanation of the potential capacity for new employment sites to be explored through the district plans.</p>
PMM026	3.2.20	<p><b>Apportionment of Urban Extensions</b></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>The Strategic Allocation at MoD Ashchurch is allocated to meet the needs of Tewkesbury Borough only and will not contribute towards the unmet needs of Cheltenham and Gloucester.</i></p>	<p>Explanatory text provided to confirm the apportionment approach being taken on the Strategic Allocation sites.</p>
PMM027	3.2.21 3.2.22	<p><b>Delivery</b></p> <p>To assess the performance of the JCS, a separate monitoring framework is included in the plan, setting out the key indicators and contingencies that will be critical to the successful delivery of the plan strategy. <i>This is set out within the Delivery, Monitoring and Review section.</i></p>	<p>Delivery section updated to point towards the more detailed Delivery, Monitoring and Review section of the plan.</p>

### JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason																								
		<p><i>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.</i></p> <p>The AMRs <i>JCS monitoring</i> will have a role in identifying 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.</p>																									
PMM028	Table SP2a: Distribution of Development in the JCS area	<p><del>Table SP2a: Distribution of development in the JCS area</del></p> <table border="1" data-bbox="582 758 1585 1219"> <thead> <tr> <th data-bbox="591 764 869 826">Distribution of Development</th> <th data-bbox="875 764 1126 826">Net additional dwellings to 2031</th> <th data-bbox="1133 764 1576 826">Ha. of employment land to 2031</th> </tr> </thead> <tbody> <tr> <td colspan="3" data-bbox="591 831 1576 858"><b>Gloucester</b></td> </tr> <tr> <td colspan="3" data-bbox="591 863 1576 890"><b>Total requirement for Gloucester City Council is 11,300 until 2031</b></td> </tr> <tr> <td data-bbox="591 895 869 957">District capacity*</td> <td data-bbox="875 895 1126 957">7,793</td> <td data-bbox="1133 895 1576 957">To be determined through the Gloucester City Plan</td> </tr> <tr> <td data-bbox="591 962 869 1123">Unmet need (to be met by urban extensions to Gloucester and Cheltenham – see Table SP2b)</td> <td data-bbox="875 962 1126 1123">3,507</td> <td data-bbox="1133 962 1576 1123"></td> </tr> <tr> <td data-bbox="591 1128 869 1155">Total</td> <td data-bbox="875 1128 1126 1155">11,300</td> <td data-bbox="1133 1128 1576 1155">26.5 ha</td> </tr> <tr> <td colspan="3" data-bbox="591 1160 1576 1187"><b>Cheltenham</b></td> </tr> <tr> <td colspan="3" data-bbox="591 1192 1576 1219"><b>Total requirement for Cheltenham Borough Council is 9,100 until 2031</b></td> </tr> </tbody> </table>	Distribution of Development	Net additional dwellings to 2031	Ha. of employment land to 2031	<b>Gloucester</b>			<b>Total requirement for Gloucester City Council is 11,300 until 2031</b>			District capacity*	7,793	To be determined through the Gloucester City Plan	Unmet need (to be met by urban extensions to Gloucester and Cheltenham – see Table SP2b)	3,507		Total	11,300	26.5 ha	<b>Cheltenham</b>			<b>Total requirement for Cheltenham Borough Council is 9,100 until 2031</b>			Table SP2a updated with latest trajectory information and reformatted to make simpler and more readable.
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		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		
		<b>Total</b>	9,100	23.4 ha	
		<b>Tewkesbury</b>			
		<b>Total requirement for Tewkesbury Borough Council is 10,100 until 2031</b>			
		District capacity*	10,640	To be determined through the Tewkesbury Borough Plan	
		Unmet need	0		
		<b>Total</b>	10,640	34.3 ha	
		<b>TOTAL HOUSING SUPPLY ACROSS THE JCS AREA</b>	<b>31,040</b>	<b>64.2 (plus 20 replacement of existing use at A8 site strategic allocation)</b>	
		* 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**

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**JCS Table of Main Modifications**

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	<i>MoD Ashchurch Strategic Allocation</i>		<i>TBC</i>	<i>2,125</i>												
	<i>Mitton</i>		<i>WDC</i>	<i>500</i>												
	<b><i>Total JCS Area</i></b>			<b><i>33,582</i></b>												
PMM030	<b>Table SP2c: Settlement hierarchy</b>	<b>Table SP2c: Settlement hierarchy</b> <table border="1" data-bbox="658 900 1637 1359"> <thead> <tr> <th data-bbox="658 900 1189 959">Settlement tier</th> <th data-bbox="1196 900 1637 959">Settlements</th> </tr> </thead> <tbody> <tr> <td data-bbox="658 963 1189 1074">Key Urban Areas</td> <td data-bbox="1196 963 1637 1074">Cheltenham Gloucester</td> </tr> <tr> <td data-bbox="658 1078 1189 1131">Market town</td> <td data-bbox="1196 1078 1637 1131">Tewkesbury</td> </tr> <tr> <td data-bbox="658 1136 1189 1246">Rural service centres</td> <td data-bbox="1196 1136 1637 1246">Bishop's Cleeve Winchcombe</td> </tr> <tr> <td data-bbox="658 1251 1189 1359">Service villages *</td> <td data-bbox="1196 1251 1637 1359">Alderton Coombe Hill</td> </tr> </tbody> </table>				Settlement tier	Settlements	Key Urban Areas	Cheltenham Gloucester	Market town	Tewkesbury	Rural service centres	Bishop's Cleeve Winchcombe	Service villages *	Alderton Coombe Hill	Settlement hierarchy updated to remove Twigworth (due to the strategic allocation) and add Stoke Orchard (following the 2015 Settlement Audit Refresh)
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Key Urban Areas	Cheltenham Gloucester															
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**JCS Table of Main Modifications**

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;">           Gotherington            Highnam            Maisemore            Minsterworth            Norton            Shurdington  <b>Stoke Orchard</b>            Toddington (inc. New Town)  <del>Twigworth</del>            Twyning            Woodmancote         </div> <p>* The service village classification was informed by the 2015<del>3</del> Settlement Audit <i>Refresh</i>. 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.</p>	
PMM031	SD1	<p><del><b>SD1 – PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT</b></del></p> <p><b>Background</b></p>	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
		<p>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</p> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p><b>Policy SD1: Presumption in Favour of Sustainable Development</b></p> <p>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.</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> <li>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</li> <li>ii. Specific policies in that framework indicate that development should be restricted.</li> </ul> <p><b>This policy contributes towards achieving all of the JCS Strategic Objectives.</b></p> </div> <p>achieve sustainable development, economic, social and environmental gains should be sought jointly</p>	

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p><b>Explanation</b></p> <p>4.1.2 — In line with Government policy advice, the JCS authorities have adopted a positive approach in seeking to meet the objectively assessed development needs of the JCS area. The policies in the JCS provide a clear framework to guide development that creates positive, sustainable growth, therefore following the presumption in favour of sustainable development, enabling proposals that accord with the JCS Strategic Objectives to be approved without delay. This policy is therefore at the heart of decision taking when assessing planning applications.</p> <p>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.</p> <p><b>Delivery</b></p> <p>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.</p>	
PMM032	SD2  4.2.1	<p><b>Background</b></p> <p>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</p>	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
		<p><del>Gloucestershire Local Enterprise Partnership (GLEP) to develop and deliver a Growth Plan for Gloucestershire as a whole.</del></p> <p><i>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 vision to provide the context for economic growth;</i></p> <p><i>“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”.</i></p> <p><i>This vision is underpinned by three specific strategic objectives to support a thriving economy through <b>building a strong and competitive urban economy, ensuring the vitality of town centres and supporting a prosperous rural economy.</b></i></p>	
PMM033	SD2 4.2.2	<p>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.</p> <p><i>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.</i></p> <p><i>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.</i></p>	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.



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Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
			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.
PMM034	Policy SD2	<p>Policy SD2: Employment <del>–</del> <i>except retail development</i></p> <p>1. Employment-related development will be supported, <del>where proposals accord with the Development Plan read as a whole and:</del></p> <p>i. At Strategic Allocations, in line with Policy SA1, <i>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.</i></p> <p>ii. <i>At locations allocated for employment use within the Development Plan</i></p> <p>iii. <i>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</i></p>	

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Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p><i>iv. For the development of new employment land within Gloucester City, the Principal Urban Area of Cheltenham and Tewkesbury town,</i></p> <p><del>ii. — of</del></p> <p><del>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</del></p> <p><del>iv.vi. in the wider countryside when it is:</del></p> <ul style="list-style-type: none"> <li><del>• located within or adjacent to a settlement <i>or existing employment area</i> and of an appropriate scale and character</del></li> <li><del>• 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.</del></li> </ul> <p><i>v. where it allows the growth or expansion of existing business especially in the key growth sectors, subject to all other policies of the plan</i></p> <p><i>vi. where it would encourage and support the development of small and medium sized enterprises, subject to all other policies of the plan</i></p> <p><del>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.</del></p> <p><b>This policy contributes towards achieving Objectives 1, 2, 3 and 9.</b></p>	<p>Para 26 of NPPF covers this, as does the new Strat. Allocation the Principal</p>

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
			Urban Area of Cheltenham and Tewkesbury town policy section above. We don't want to rule out offices on Employment Strategic Allocations. Retail Development should be in the retail policy
PMM035	4.2.3	<p><b>Explanation</b></p> <p>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. <del>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.</del></p> <p>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:</p> <p>Promotion: <del>————</del> To promote Gloucestershire as a great place to work, visit and invest.</p> <p>Connection: <del>To develop the infrastructure that will support economic growth.</del></p> <p>Skills: <del>————</del> To create a highly employable and productive population.</p>	Substantial expansion and clarification of the economic explanation.

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p><i>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 provision for the JCS area as a whole.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>Key growth sectors and other important local economic drivers</i></p> <p><i>The main thrust of the economic strategy for the JCS area is to support the M5 growth corridor proposed</i></p>	

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p><i>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.</i></p> <p><i>M5 growth corridor</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p>	

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
	4.2.5	<p><i>Policy SD2</i> aims to support employment development and economic prosperity by taking an economic-led, urban-focused development approach, with the primary aim of attracting investment and development to the main urban areas and the Strategic Allocations in the plan area. The strategy seeks to deliver strong, robust and resilient urban areas which create jobs and wealth. This in turn will support the on-going regeneration programmes of Gloucester and Cheltenham urban areas.</p> <p><del>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.</del></p>	
	4.2.6	<p>Employment uses, such as retail (<i>covered in policy SD3</i>), 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.</p> <p><i>Key growth sectors</i></p> <p><i>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:-</i></p> <ul style="list-style-type: none"> <li>• <i>Aviation</i></li> </ul>	

**JCS Table of Main Modifications**

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<ul style="list-style-type: none"> <li>• <i>Cyber technology</i></li> <li>• <i>Energy</i></li> <li>• <i>Engineering</i></li> <li>• <i>Financial</i></li> <li>• <i>Information technology</i></li> <li>• <i>Leisure</i></li> <li>• <i>Marketing and public relations</i></li> </ul> <p><i>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.</i></p> <p><i>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, <i>Because of the constrained supply of employment land in the urban areas, the JCS authorities will wish to evaluate the implications of changes of use. As such, policies on the safeguarding of employment sites will be set out in district plans.</i></i></p> <p><i>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</i></p>	

**JCS Table of Main Modifications**

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p><i>which provide a range of types and sizes of units including start-up and flexible workspaces. More information and guidance in this respect will come forward in district plans. Where specialised skills are available, clusters of enterprises can add value to the economy. This spatial strategy can support skills development by encouraging the provision and expansion of suitable education and training facilities with access in person and by electronic means.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>Cheltenham racecourse</i></p> <p><i>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),</i></p>	



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		<p><i>it is clear that the Racecourse and its influence underpins the cultural offer, contributing significantly to the economy of Cheltenham.</i></p> <p><i>The Racecourse’s primary function as a racing venue brings significant economic benefits to the region in terms of financial income and job creation:</i></p> <ul style="list-style-type: none"> <li><i>• 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).</i></li> <li><i>• The Racecourse currently employs 85 full time staff on site, with the additional employment of around 5,000 staff during the Festival</i></li> <li><i>• 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</i></li> </ul> <p><i>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.</i></p> <p><i>Gloucestershire airport</i></p> <p><i>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</i></p>	

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Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p><i>the airport and aviation-related growth.</i></p> <p><i>Gloucestershire University</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>Tourism</i></p>	

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Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>Regeneration</i></p> <p><i>The reuse and regeneration of sites within the urban areas is as important as new greenfield site development.</i></p> <p><i>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</i></p>	

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p><i>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.</i></p> <p><i>The regeneration of Tewkesbury town centre is a key area of work for the Borough Council. A Tewkesbury 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.</i></p> <p><i>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.</i></p>	
PMM036	4.2.13	<p><b>Delivery</b></p> <p>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.</p> <p><i>It is essential that the JCS has sufficient flexibility to act as a catalyst for long- term growth, taking account</i></p>	

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<i>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.</i>	
PMM037	SD3 Title	<del>RETAIL HIERARCHY</del> <b>AND CITY/TOWN CENTRES</b>	Chapter title changed to 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 <del>partly</del> <i>largely</i> due to the <i>structural changes in the retail market and, in particular, the impact of internet shopping</i> <del>recession and recent changes in the behaviour of shoppers, such as the increase in online shopping.</del> 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	<p><b>Policy SD3: Retail Hierarchy <i>and city / town centres</i></b></p> <p><b>1. Settlement Hierarchy</b> The area's <i>city and town</i> 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:</p> <p style="text-align: center;"><b>Key Urban Areas</b></p> <p style="text-align: center;">Gloucester <i>City Centre</i> and Cheltenham <i>Town Centre</i></p> <p style="text-align: center;"><b>Market town</b></p> <p style="text-align: center;">Tewkesbury <i>Town Centre</i></p> <p style="text-align: center;"><b>Rural service centres serving their rural hinterland</b></p> <p style="text-align: center;">Winchcombe <i>Town Centre</i> and Bishop's Cleeve <i>Village Centre</i>.</p> <p><del>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.</del></p>	<p>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) This 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)</p>

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

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	<p>Policy SD3</p>	<p><b>2. Cheltenham and Tewkesbury Borough Retail Policies</b></p> <p><i>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.</i></p> <p><i>Within the Boroughs of Cheltenham and Tewkesbury, new retail development will be encouraged in accordance with the policies in the saved local plans.</i></p> <p><b>3. Gloucester City Shopping Frontages</b></p> <p><i>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:</i></p> <ul style="list-style-type: none"> <li><b>i. Primary frontages</b></li> <li><i>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 proposed use will maintain or enhance the vitality of the area and where it would not have a significant adverse impact on the amenity of adjacent residents or businesses.</i></li> <li><b>ii.</b></li> <li><b>iii. Secondary frontages</b></li> <li><i>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.</i></li> </ul>		
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### JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason																						
	Policy SD3	<p><b>4. Retail Floor Space Requirements</b></p> <p>Over the plan period to 2031, provision will be made for approximately <i>at least</i> the following new <i>retail</i> floorspace requirements in <i>for</i> the existing designated centres <i>following settlements</i>:</p> <table border="1" data-bbox="582 584 1518 1043"> <thead> <tr> <th></th> <th>Convenience goods floorspace capacity (sq. m net)</th> <th>Comparison goods floorspace capacity (sq. m net) approx.</th> </tr> </thead> <tbody> <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> <tr> <td>Winchcombe</td> <td>250</td> <td>450</td> </tr> <tr> <td>Bishop's Cleeve</td> <td>1,200</td> <td>625</td> </tr> </tbody> </table> <p><i>Comparison goods</i></p> <table border="1" data-bbox="674 1342 1498 1391"> <thead> <tr> <th><i>Location</i></th> <th><i>Comparison goods (net sales area, sq m)</i></th> </tr> </thead> <tbody> <tr> <td></td> <td></td> </tr> </tbody> </table>		Convenience goods floorspace capacity (sq. m net)	Comparison goods floorspace capacity (sq. m net) approx.	Cheltenham	0	70,000	Gloucester	0	42,000	Tewkesbury	0	825	Winchcombe	250	450	Bishop's Cleeve	1,200	625	<i>Location</i>	<i>Comparison goods (net sales area, sq m)</i>			
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		<p><b>5. Key principles for development in centres</b></p> <p>The following key principles will be drawn upon in the determination of relevant planning applications:</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>iii. <i>Proposals that bring forward the regeneration strategies for Gloucester City Centre, Cheltenham Town Centre and Tewkesbury Town Centre will be supported.</i></li> <li>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.</li> <li>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.</li> </ul> <p><b>6. Retail Review</b></p> <p><i>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.</i></p>	
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	

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		<p>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. <del>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.</del></p>	Elaborated on in the following paragraph.
PMM041	Additional text after 4.3.6	<p><i>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.</i></p>	
PMM042	4.3.7 to 4.3.9	<p><del>4.3.6.1 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.</del> <i>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.</i></p>	Elaborating on the role of Tewkesbury Town

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		<p><i>Within Tewkesbury Borough</i>, smaller 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.</p> <p>The policy set out above has been prepared in the context of the NPPF <i>and Planning Practice Guidance. It is underpinned by evidence contained in</i> <del>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 identifies</del> floorspace requirements for <del>convenience (food) and comparison goods (clothes, furniture etc) shopping</del> <i>and convenience goods (food) for each of the main settlements identified in the hierarchy</i> in the existing centres until <i>up to</i> 2031. <del>Where the table in the policy shows ‘0’, this is due to existing planning commitments already providing the required floorspace.</del> The Retail Study <i>(Phase 1)</i> also provided an analysis of the health of the different designated centres in the JCS area, <del>with the exception of the smaller local centres, which have been assessed separately.</del> 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.</p> <p><i>Following the adoption of the JCS, this policy will be subject to an immediate review.</i></p>	<p>Providing an update on the latest retail evidence</p> <p>Reinforcing the commitment to review the retail policy</p>
PMM043	Delivery 4.3.10	<p><del>These include, for example, the establishment of detailed town centre boundaries, Primary and Secondary Shopping Areas,</del> the allocation of <i>non-strategic</i> sites to provide for identified need, and the identification of locally defined thresholds for impact assessments (as necessary).</p>	<p>JCS now makes provision for town centre boundaries and frontages, which will be covered in the review and...</p>

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			To provide clarity on which element of the Local Plan strategic and non-strategic sites will be considered.
PMM044	SD4 4.4.3	<p>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, <i>and</i> actively supporting energy efficiency improvements in existing buildings <del>and ensuring that planning policy is consistent with the Government's zero carbon buildings policy, and adopts nationally described standards.</del></p> <p>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.</p>	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	<p>Policy SD4: Sustainable Design and Construction</p> <ol style="list-style-type: none"> <li>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 <del>and where viable, exceed applicable</del> national standards.</li> </ol>	1) and (5) Changes in national legislation, policy and guidance and relevant ministerial statements have removed the

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Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p>All development will be expected to be adaptable to climate change in respect of the design, layout, siting, orientation and function of both buildings and associated external spaces. Proposals must demonstrate that development is designed to use water efficiently, will not adversely affect water quality, and will not hinder the ability of a water body to meet the requirements of the Water Framework directive.</p> <p>2. <i>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.</i> <del>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.</del></p> <p><del>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).</del></p>	<p>provision of higher standards than those required at national level. (2) Reworded to increase clarity in response to the Gloucestershire County Council submissions.</p>
PMM046	SD4 4.4.6	<p><b>Explanation</b></p> <p><del>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.</del></p>	
PMM047	SD4 4.4.9 – 4.4.10	<p><del>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</del></p>	<p>This text was deleted because the relevant policy text was also</p>

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		<p><del>Minimisation in Development Projects'. The approach set out in that document is endorsed by the JCS authorities and will be used in decision taking.</del></p> <p><del>The British Geological Survey mineral resource map for Gloucestershire suggests that sand, gravel and limestone resources are present; in the JCS area. To avoid the unnecessary sterilisation of these important mineral resources, the Gloucestershire Minerals Local Plan (prepared by the County council) is required to define Minerals Safeguarding Areas along with appropriate policies for managing development. 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.</del></p> <p><i>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.</i></p> <p><i>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</i></p>	<p>deleted. Changes in national legislation, policy and guidance and relevant ministerial statements have removed the provision of higher standards than those required at national level.</p> <p>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.</p>



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		<i>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.</i>	
PMM048	4.4.12	<del>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 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.</del>	Reference to the study is deleted as it is no longer referred to in the policy, 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	<del>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.</del>  <del>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.</del>	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	<del>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</del>	This text was moved to later on in the chapter to improve readability.

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	4.6.2	assessment which considers how strategic segments of the Green Belt perform against the purposes of including land within Green Belt.	
PMM051	4.6.5	<p>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:</p> <ul style="list-style-type: none"> <li>i. — Checking the unrestricted sprawl of large built up areas</li> <li>ii. — Preventing nearby towns from merging into one another</li> <li>iii. — Assisting in safeguarding the countryside from encroachment</li> <li>iv. — Preserving the setting and special character of historic towns.</li> </ul> <p>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.</p> <p><i>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</i></p>	<p>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.</p> <p>This text has been added as an overview of the consideration of Green</p>

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		<p><i>assessment which considers how strategic segments of the Green Belt perform against the purposes of including land within Green Belt</i></p> <p><i>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.</i></p> <p><i>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).</i></p> <p><i>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.</i></p>	<p>Belt as part of the JCS, including the work undertaken through examination</p>
PMM052	SD6 Policy	<p>Policy SD6: Green Belt</p> <p>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. <i>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'</i></p> <p>The boundaries of the reviewed Green Belt are identified on the proposed Changes to the green Belt Boundary Map (see Appendix 2).</p>	<p>(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</p>

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		<p><i>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</i></p> <p>Gloucestershire Airport, Cheltenham Racecourse, <i>existing waste management facilities in the Green Belt operating in accordance with extant planning permission</i>, and the waste management sites allocated in the Gloucestershire Waste Core Strategy, are designated as developed sites within the green Belt that are acknowledged as having wider benefits where the co-location of facilities can be determined as essential to their use. Notwithstanding this, further development in any of these locations will need to meet the requirements of green Belt policy in the NPPF <i>and/or National Planning Policy for Waste</i>, be in accordance with the development Plan, and not compromise the openness of the Green Belt or increase the risk of urban sprawl, <i>unless very special circumstances can be demonstrated</i>.</p> <p><u>Gloucestershire Airport</u></p> <ul style="list-style-type: none"> <li>i. Gloucestershire Airport is shown on Inset Map 1 (see Appendix 3)</li> <li>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</li> <li>iii. Elsewhere within the airport, in the Non-Essential Operational area, business uses which support the airport will be permitted.</li> </ul> <p><u>Cheltenham Racecourse</u></p> <p>At Cheltenham Racecourse, as shown on Inset map 2 (Appendix 4), development, including extensions, will only be permitted where:</p> <ul style="list-style-type: none"> <li>i. The development is principally related to the business of the racecourse</li> </ul>	<p>clarify that the policy provision applies to existing consented waste facilities in the Green Belt and include reference to the ‘very special 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</p>

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		<p>ii. The development does not extend beyond the confines of the <i>'Racecourse Policy Area'</i> (as show on Inset Map 2).</p> <p><u>Waste Management Sites</u></p> <p>The Gloucestershire Waste Core Strategy allocates sites for waste management <i>recovery</i> facilities, <i>including</i> within the Green Belt. <del>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.</del> <i>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.</i></p> <p><u>Safeguarded Areas</u></p> <p>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 <del>this safeguarded</del> land <i>at West Cheltenham</i> is also designated as a <del>Development Exclusion</del> <i>an Odour Monitoring</i> zone, where development which is likely to be significantly affected by odours will not be permitted</p> <p>ii. An area of land at north west cheltenham, as shown on strategic Allocation plan A5, will be safeguarded for longer-term development needs</p> <p>iii. <i>An area of land at Twigworth, as shown on strategic Allocations Plan A1, will be safeguarded for longer-term development needs</i></p> <p>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</p>	<p>further work to demonstrate where development, with appropriate mitigation can take place. Therefore this provision has been retitled 'Odour Monitoring Zone'.</p> <p>(iii) addition of safeguarded land at Twigworth following the inclusion on a strategic allocation at this location.</p> <p>(iv) Wording amended to reflect the need for physical connectivity of any potential scheme</p>

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		<p>the JCS deems the release of this land necessary and appropriate and proposes the development.</p> <p>v. Should any land be released in the safeguarded area, development proposals will be assessed against the following criteria:</p> <ul style="list-style-type: none"> <li>- Development must be well-integrated and planned as part of any urban extension of strategic scale, directly and substantially <i>physically</i> linked to the urban area of Cheltenham</li> <li>- 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</li> <li>- Development must not lead to a piecemeal, isolated or inefficient use of land in this area.</li> </ul>	
PMM053	4.6.12 – 4.6.14	<p>Because of the Racecourse’s location in the Green Belt, new development will need to be well related to the business of the Racecourse, <del>although this would necessarily preclude its use for other activities where these are appropriate Green Belt.</del> <i>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.</i></p> <p>The Cheltenham Racecourse policy area has been <del>slightly</del> amended from that shown in the 2006 Cheltenham Plan to allow for further growth of facilities required for the business of the racecourse.</p> <p><i>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).</i></p>	<p>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.</p> <p>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,</p>

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		<p><i>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 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.</i> <del>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.</del></p>	<p>balancing the sensitivity of the Green Belt.</p> <p>Text modified to take into account the submissions 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.</p>
PMM054	4.6.15 – 4.6.18	<p><b>Other amendments to the Green Belt boundary</b></p> <p><u>Shurdington</u>  <del>Amendments have been made to the Green Belt boundary at Shurdington, shown on inset map 3 (appendix 5), to allow limited development and to provide a more appropriate boundary.</del></p> <p><del>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.</del></p> <p><u>West Cheltenham</u>  <i>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.</i></p>	<p>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.</p>

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		<p><u>South West Cheltenham</u> A small change has been made to the green Belt boundary at the south west of Cheltenham (known as the former M&amp;G site) to provide a more appropriate boundary after an implemented permission.</p> <p><i>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.</i></p>	<p>This text was included to remove from the green belt the consented and started scheme at Grovefield way as discussed through the examination.</p>
PMM055	4.6.21 – 4.6.22 Safeguarded Land	<p>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 <i>has been upgraded in recent years, but still</i> emits odours which have the potential to seriously affect any development that occur nearby.</p> <p><i>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.</i></p> <p><del>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.</del> <i>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</i></p>	<p>updated to show that the works is the subject to ongoing updating and upgrades</p> <p>The authorities have a statement of common</p>



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		<p><i>relocation of the existing treatment works. In time, this would enable the entire area of the Safeguarded Land to be released for development.</i></p> <p><del>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 redevelopment of the area.</del> <i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p>	<p>ground with the consortium at West Cheltenham (exam 198) which describes ongoing work regarding odour 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.</p> <p>Explanation of the Safeguarded Land at Twigworth that has resulted from the strategic allocation in this area.</p>

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PMM056	SD8 Policy	<p>Policy SD8: The Cotswolds Area of Outstanding Natural Beauty (AONB)</p> <p>All development proposals in <del>adjacent to</del> <i>within the setting of</i> the Cotswolds AONB will be required to conserve and, where appropriate, enhance its landscape, scenic beauty, wildlife, cultural heritage and other special qualities. Proposals will be required to be consistent with the policies set out in the Cotswolds AONB Management Plan.</p>	SD8 wording amended to "within the setting of" agreed during the examination session on the policy and in accordance with national policy and guidance
PMM057	SD9 Policy no. 5	<p>Policy SD9: Historic Environment</p> <p>Development proposals at Strategic Allocations must have regard to the findings and recommendations of the JCS Historic Environment Assessment (or any subsequent revision) <i>demonstrating that the potential impacts on heritage assets and appropriate mitigation measures have been assessed.</i></p>	SD9 (5) Added to reflect the representations of Historic England on the importance of assessing impacts on heritage assets.
PMM058	SD10 Policy Number 2	<p>Policy SD10: Biodiversity and Geodiversity</p> <p>This will be achieved by:</p> <ul style="list-style-type: none"> <li>- Ensuring that European protected Species and National protected Species are safeguarded in accordance with the law</li> <li>- 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, <i>thus ensuring that new development both within and surrounding such sites has no unacceptable adverse impacts</i></li> </ul>	Change suggested by Natural England to capture

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			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 <i>at Appendix 8</i> 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 mitigation measures into the design of developments. <i>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.</i> 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).	Reflecting representations by Natural England
PMM061	SD11 Policy number 2, 3, 4	<p>Policy SD11: Residential Development</p> <p>Housing development will be permitted <i>at sites allocated for housing through the development plan, including Strategic Allocations and allocations in</i> <del>on sites that are allocated for housing by</del> district and neighbourhood plans.</p> <p>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, <i>the Principal Urban Area of Cheltenham and Tewkesbury towns, rural service centres and service villages except where otherwise restricted by policies within district plans.</i></p> <p>Housing development on other sites will only be permitted where:</p> <ul style="list-style-type: none"> <li>- It is for affordable housing on a rural exception site in accordance with Policy SD13 or</li> </ul>	<p>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</p>

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		<ul style="list-style-type: none"> <li>It is infilling within the existing built-up areas of <i>the City of Gloucester cities, the Principal urban Area of Cheltenham, Tewkesbury Borough's</i> towns and villages <i>except where otherwise restricted by policies within district plans</i>, or</li> </ul>	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 this strategy and the relevant district and neighbourhood plans. <del>In addition to this, proposals that will bring empty space back into use are encouraged.</del>	More detailed policies on this issue will be dealt with through district plans.
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 <del>SHLAA</del> <i>SALA</i> , 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. <del>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.</del>	Shared approach to SALA already in place between JCS authorities. A working group has been established across Gloucestershire.
PMM065	SD12 4.12.3	<b>Explanation</b>	

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		<p>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 <i>and 2015 JCS update</i>, 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.</p>	<p>Provides the most up to date evidence on the SHMA.</p>
PMM066	4.12.6	<p>New housing should be designed in a way that enables households, including older people <i>and those with disabilities</i> 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 <i>or</i> <del>and</del> 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.</p>	<p>To encourage homes suitable for people throughout their lives.</p> <p>Clarification that standards could be met or exceeded.</p>
PMM067	After 4.12.8	<p><i>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.</i></p>	<p>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</p>

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			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.
PMM068	4.12.10 – 4.2.12 Delivery	<p>The Gloucestershire <del>2014</del> <i>updated 2015</i> SHMA 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.</p> <p><i>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.</i></p> <p>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</p>	<p>Provides most up to date evidence on the SHMA.</p> <p>Provides an update on progress of the Government’s Housing Standards Review.</p>

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		proportions to be delivered should be agreed with the local authority. <del>Subject to</del> <i>Following</i> the findings of the Government's Housing Standards Review, district plans may in future <i>also</i> adopt specific standards for accessibility and adaptability.	
PMM0069	SD13 Background 4.13.2	<p>There are three main classifications of affordable housing <i>as set out in Annex 2 of the NPPF</i>:</p> <p>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.</p> <p><i>The Government, through the Housing &amp; 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.</i></p>	<p>Provides reference to currently definition of Affordable Housing contained within the NPPF.</p> <p>Provides an update on the latest position regarding Starter Homes.</p>
PMM0070	SD13 Policy Number 1, 2, 6, 7, 9 & 10	<p><del>The JCS local authorities will seek through negotiation to deliver new affordable housing as follows:</del></p> <ol style="list-style-type: none"> <li><del>1. On sites of 5-9 dwellings 9or covering 0.2 hectares or more of land), 20% affordable housing will be sought</del></li> <li><del>2. On sites of 10 or more dwellings 9or covering 0.4 hectares of more of land), 40% affordable housing will be sought</del></li> </ol> <p>The JCS authorities will seek, through negotiation, <i>for new development</i> to deliver new affordable housing on a sliding scale approach as set out below:</p> <p><i>i. Within the Strategic Allocation sites 35% affordable housing will be sought.</i></p>	<p>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 Starter Homes) can meet this requirement. (7) to provide clarity on the</p>

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		<p><i>ii. Outside of the Strategic Allocation sites, on sites of 11 dwellings or more, 20% affordable housing will be sought on developments within the Gloucester City administrative area and 40% will be sought within the Cheltenham Borough and Tewkesbury Borough administrative areas.</i></p> <p><i>iii. On sites of 10 dwellings or less, no contribution towards affordable housing will be sought.</i></p> <p><i>iv. Notwithstanding the above, affordable housing policy for designated rural areas (as described under <u>section 157 of the Housing Act 1985</u>) will be set out in district plans.</i></p> <p>For the purpose of This policy, residential units are dwelling houses <b>applies</b> to dwellings (<i>as defined by</i> 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 <b>as a whole</b> for the purpose of determining the appropriate affordable housing requirement</p> <p>Provision should be made, <i>where possible</i>, 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.</p> <p><b>Rural exception sites</b> 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 <del>small</del> scale <del>and</del> well related to the settlement both functionally and in terms of design.</p> <p>If a development cannot deliver the full affordable housing requirement, a viability assessment, <i>conforming to an agreed methodology</i>, in accordance with Policy INF7 will be required. <i>Viability assessments will be published in full prior to determination for all non-policy compliant schemes Where</i></p>	<p>definition of the scale of new development</p>



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		<p><i>necessary the JCS authorities will arrange for them to be independently appraised at the expense of the applicant.</i></p> <p><i>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.</i></p>	
PMM0071	4.13.4 onwards	<p>The Gloucestershire SHMA 2014, <i>updated in September 2015</i>, 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:</p> <ul style="list-style-type: none"> <li>• Planning commitments at the base date of the LTBHM model (2013)</li> <li>• 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.</li> <li>• 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 <i>and the potential for Section 106 and Community Infrastructure Levy contributions.</i></li> </ul> <p>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. <i>The latest evidence from the 2015 SHMA, which emerged through the JCS examination, determined that there is a need for 638 affordable houses per year across the JCS area.</i> 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</p>	<p>Provides updated evidence on the SHMA</p> <p>To reflect latest JCS evidence on viability.</p>

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		<p>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.</p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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 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</i></p>	<p>Updated to include latest affordable need figure and abbreviated to aid readability. Further narrative is provided in the evidence base documents.</p> <p>Provides explanatory text on the issues of viability across housing developments in the JCS area.</p>

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		<p><i>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.</i></p> <p><del>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%.</del></p> <p><i>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.</i></p> <p>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.</p> <p><i>As part of the mix of affordable housing, developments should also consider the needs of specialist 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</i></p>	<p>Provides justification of the approach to affordable housing across the JCS area.</p> <p>Provide justification of the approach to affordable housing at Strategic Allocations.</p>

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		<p><i>needs of these communities who are identified either within or outside the Government's definition set out through the Planning Policy for Traveller Sites.</i></p>	<p>Provides explanatory text on the issues of viability across housing developments in the JCS area.</p> <p>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.</p>

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PMM0072	<b>Policy SD14</b>  4.14.1, 2 & 3	<p>‘Planning Policy for Traveller Sites’ (<i>PPTS</i>) was <i>first</i> published by the Government in March 2012 and <del>aligns</del> <i>aligned</i> 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. <i>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 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.</i></p> <p>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. <del>There are particular concentrations in Tewkesbury Borough</del> <i>is home to the majority of communities within the JCS area,</i> close to the urban areas of Gloucester and Cheltenham.</p> <p><del>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</del></p>	<p>New background text to reflect the Government’s latest Planning Policy for Traveller Sites.</p> <p>Modified to enhance readability.</p> <p>Updated to reflect new assessment based on Governments latest Planning Policy for Traveller Sites.</p>

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Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p>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. <i>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.</i></p>	
PMM0073	SD14 Policy	<p><b>Policy SD14: Gypsies, Travellers and Travelling Showpeople</b></p> <ol style="list-style-type: none"> <li>1. <i>Existing permanent residential and transit Gypsy, Traveller and Travelling Showpeople sites, identified on the proposals map, will be protected from development to alternative uses.</i></li> <li>2. All—Proposals for new <i>permanent and temporary, residential and transit</i> Gypsy, Traveller and Travelling Showpeople sites will be assessed against the following criteria:           <p style="margin-left: 20px;"><del>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.</del></p> <ol style="list-style-type: none"> <li>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 <del>will</del> <i>must</i> not have an unacceptable impact on the character and appearance of the landscape and the amenity of neighbouring properties, and <del>is</del> <i>should be</i> sensitively designed to mitigate any impact on its surroundings.</li> </ol> </li> </ol>	(1) To ensure the protection of existing GTTS sites. (2) clarification that 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	<p>The Gloucestershire <i>GTAA 2016</i> sets out the need for new pitches/plots resulting from existing traveller communities in Gloucestershire <i>between a new base date of 2016</i> <del>2013</del> and <i>the plan end date of 2031</i>. Within the JCS area, the assessment sets out the requirement for provision of <del>151 permanent</del> <i>8</i> pitches for Gypsies and Travellers (as shown in Table C4 below) <i>who meet the 2015 definition of Travellers for planning purposes</i>. <del>Of these, 147 pitches relate to communities that currently reside in Tewkesbury</del></p>	Provide explanation of the impact of the latest

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Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason																				
		<p><del>Borough</del> <i>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, with 8 in Gloucester City.</i></p> <p><i>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.</i></p>	<p>Government guidance on Planning Policy for Traveller Sites on the latest GTTA 2016.</p> <p>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.</p>																				
PMM0075	Table C4 and C5	<p><b>Table C4 – Permanent Gypsy and Traveller Pitch Requirements in the JCS area</b></p> <table border="1" data-bbox="577 1220 1547 1370"> <thead> <tr> <th data-bbox="577 1220 734 1297">Local Authority</th> <th colspan="2" data-bbox="734 1220 920 1297">2013-2017</th> <th colspan="2" data-bbox="920 1220 1106 1297">2018-2022</th> <th colspan="2" data-bbox="1106 1220 1292 1297">2023-2027</th> <th colspan="2" data-bbox="1292 1220 1478 1297">2028-2031</th> <th data-bbox="1478 1220 1547 1297">Total</th> </tr> <tr> <td data-bbox="577 1297 734 1370"></td> <td data-bbox="734 1297 826 1370">Public</td> <td data-bbox="826 1297 920 1370">Private</td> <td data-bbox="920 1297 1012 1370">Public</td> <td data-bbox="1012 1297 1106 1370">Private</td> <td data-bbox="1106 1297 1198 1370">Public</td> <td data-bbox="1198 1297 1292 1370">Private</td> <td data-bbox="1292 1297 1384 1370">Public</td> <td data-bbox="1384 1297 1478 1370">Private</td> <td data-bbox="1478 1297 1547 1370"></td> </tr> </thead></table>	Local Authority	2013-2017		2018-2022		2023-2027		2028-2031		Total		Public	Private	Public	Private	Public	Private	Public	Private		
Local Authority	2013-2017		2018-2022		2023-2027		2028-2031		Total														
	Public	Private	Public	Private	Public	Private	Public	Private															

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Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes										Reason
		Cheltenham	0	1	0	0	0	0	0	1	2	
		Gloucester	0	1	0	0	0	0	0	1	2	
		Tewkesbury	20	44	12	15	13	16	12	15	14	
		Total	20	46	12	15	13	16	12	17	15	
		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	0	0	
		Gloucester	0	0	0	0	0	0	0	0	0	
		Tewkesbury	0	5	0	1	0	2	0	2	8	
		Total	0	5	0	1	0	2	0	2	8	
		<b>Table C5 – Permanent Travelling Showpeople Plot Requirements in the JCS area</b>										



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		<table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th colspan="8" style="color: red;">Meet the PPTS 2015 Definition</th> </tr> <tr> <th style="color: red;">Local Authority</th> <th colspan="2" style="color: red;">2016-2021</th> <th colspan="2" style="color: red;">2021-2026</th> <th colspan="2" style="color: red;">2026-2031</th> <th style="color: red;">Total</th> </tr> <tr> <th></th> <th style="color: red;">Public</th> <th style="color: red;">Private</th> <th style="color: red;">Public</th> <th style="color: red;">Private</th> <th style="color: red;">Public</th> <th style="color: red;">Private</th> <th></th> </tr> </thead> <tbody> <tr> <td style="color: red;">Cheltenham</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td style="color: red;">Gloucester</td> <td>0</td> <td>7</td> <td>0</td> <td>0</td> <td>0</td> <td>1</td> <td>8</td> </tr> <tr> <td style="color: red;">Tewkesbury</td> <td>0</td> <td>17</td> <td>0</td> <td>2</td> <td>0</td> <td>2</td> <td>21</td> </tr> <tr> <td style="color: red;">Total</td> <td>0</td> <td>24</td> <td>0</td> <td>2</td> <td>0</td> <td>3</td> <td>29</td> </tr> </tbody> </table>	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	
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Total	0	24	0	2	0	3	29																																																				
PMM0076	4.14.5	<p>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. <i>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</i></p>																																																									

## JCS Table of Main Modifications

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		<p><del><i>pitches in total. The suggested need arising from the GTTSAA has therefore been exceeded.</i></del> In addition, the JCS authorities are pursuing a policy of ‘temporary toleration’ as opposed to publicly owned transit sites.</p> <p>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) <i>PPTS</i> 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.</p> <p><del>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 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.</del></p> <p><del>‘Planning Policy for Traveller Sites’ PPTS 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.</del></p>	<p>Clarification on the position of transit sites within the JCS.</p> <p>The JCS no longer requires a specific commitment for GTTS pitches on strategic</p>

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Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
			<p>allocations, but instead affordable requirements will be met through Policy SD13.</p> <p>Criteria based policy provided through Policy SD14. District plans may wish to development further detailed policy and guidance if required..</p>
PMM0077	Delivery 4.14.8 & 9	<p>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. <del>Policy SA1 provides detail with regard to site provision through the JCS.</del></p> <p>In order to bring forward adequate numbers of sites for Gypsies, Travellers and Travelling Showpeople communities, it <del>will</del> <i>may</i> also be necessary for provision to come forward through smaller non-strategic sites, <del>particularly during the first five years of the plan.</del> This will be <del>established</del> <i>examined</i> through the lower-level district plans.</p>	
PMM0078	<b>Policy SD15</b> Policy number 3	<p>Proposals for development at Strategic Allocations, and other development proposals <i>as appropriate</i> <del>at the discretion of the local planning authority</del>, must be accompanied by a health impact assessment.</p>	SD15 (3) Edited to wording agreed during the examination session on this policy to increase its readability and effectiveness

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Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason								
PMM0079	Delivery After 4.15.8	<i>Applications which may require health impact assessments should first be screened to determine whether it is necessary for a full assessment to take place</i>	Text added to clarify the need for screening for Health Impact Assessments where required.								
PMM0080	Part 5 Policy INF1 and INF 2 5.2.2 - 5.2.5	<p><b>INF1 and INF2 –TRANSPORT NETWORK</b></p> <p><b>Background</b>            The NPPF states in Paragraph 29 that <i>'The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel'</i>. 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 <i>through its policies on design and infrastructure</i> (see, for example, criterion vii of Policy SD5). This policy contributes to the delivery of <i>the</i> strategy's ambitions and strategic objectives including:</p> <table border="1" data-bbox="571 1085 1534 1388"> <thead> <tr> <th>Ambition</th> <th>Strategic Objective</th> </tr> </thead> <tbody> <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> </tbody> </table>	Ambition	Strategic Objective	A thriving economy	1)Building a strong and competitive urban economy 2)Ensuring vitality of town centres	A sustainable natural and built environment	4)Conserving and enhancing the environment 5)Delivery excellent design in new developments 6)Meeting the challenges of climate change	A healthy, safe and inclusive community	7)Promoting sustainable transport 9)promoting healthy communities	<p>Section title changed to better reflect policy provisions.</p> <p>Removal of specific NPPF references in line with the rest of the JCS.</p>
Ambition	Strategic Objective										
A thriving economy	1)Building a strong and competitive urban economy 2)Ensuring vitality of town centres										
A sustainable natural and built environment	4)Conserving and enhancing the environment 5)Delivery excellent design in new developments 6)Meeting the challenges of climate change										
A healthy, safe and inclusive community	7)Promoting sustainable transport 9)promoting healthy communities										

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Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p>The preparation and implementation of transport <i>strategy is primarily a matter for the Local Transport Plan</i> 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.</p> <p>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. <i>The LTP is the key strategy for the delivery of essential transport infrastructure to support the delivery of growth identified through the JCS.</i> 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.</p> <p><del>The Highways England Agency, an executive agency of the Department for Transport,</del> <i>is a government company that is charged with operating, maintaining and improving</i> manages and maintains the strategic road network <i>in the area</i> including the M5, M50, A40, A46 and A417. <del>The Highways Agency also</del> <i>Highways England also</i> 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.</p>	<p>Table deleted to not duplicate reference to objectives in policy and to bring in line with the rest of the JCS.</p> <p>Clarification on the role of development plans in developing the transport strategy.</p> <p>Clarification on the role of the LTP.</p> <p>Updated to provide information on the change from Highways Agency to Highways England.</p>

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Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
PMM0081	Policy INF1 and INF 2	<p><b><del>Policy INF1: Access to the Transport Network</del></b></p> <p><del>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:</del></p> <ul style="list-style-type: none"> <li><del>v. The development provides safe vehicular access to the highway network</del></li> <li><del>vi. Any increased level of car use derived from the development does not result in severe increases in congestion on the network. Severe increase in congestion in this context relates to highway junctions no longer operating within their design capacity</del></li> <li><del>vii. Any severe increase in congestion likely to arise from development must be mitigated to ensure highway junctions operate within their design capacity, and</del></li> <li><del>viii. 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</del></li> </ul> <p><del>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.</del></p> <p><b><del>This policy contributes towards achieving Objectives 1, 2, 3, 6, 7 and 9.</del></b></p> <p><b><del>Policy INF2 – Safety and Efficiency of the Transport Network</del></b></p> <p><del>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:</del></p> <ul style="list-style-type: none"> <li><del>i. Congestion at network pinch points</del></li> <li><del>ii. Travel safety within the vicinity of the development, and</del></li> </ul>	

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Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p>iii. <del>Noise and/or atmospheric pollution within the vicinity of the development.</del></p> <p>2. <del>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.</del></p> <p><b>This policy contributes towards achieving Objectives 4, 5, 6, 7 and 9</b></p> <p><i>Policy INF1: Transport Network</i></p> <p>1. <i>Developers should provide safe and accessible connections to the transport network to enable travel choice for residents and commuters. All proposals should ensure that:</i></p> <p><i>a. Safe and efficient access to the highway network is provided for all transport modes</i></p> <p><i>b. Connections are provided, where appropriate, to existing walking, cycling and passenger transport networks and should be designed to encourage maximum potential use</i></p> <p><i>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</i></p> <p>2. <i>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.</i></p> <p>3. <i>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</i></p>	<p>Policy INF1 and INF2 have been amalgamated following discussions at examination that there was duplication between them.</p> <p>(1b) recommended addition following engagement with Gloucestershire County Council</p> <p>(1c) recommended addition following engagement with Stagecoach bus operator.</p> <p>(2) Amalgamation of previous policy INF1 1.ii and INF2 2.</p>

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Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p><i>the prospective development on:</i></p> <ul style="list-style-type: none"> <li><i>a. Congestion on the transport network</i></li> <li><i>b. Travel safety within the zone of influence of the development</i></li> <li><i>c. Noise and/or atmospheric pollution within the zone of influence of the development</i></li> </ul> <p><i>4. Where appropriate the local planning authority may require applications to be accompanied by a Travel Plan that has full regard to the criteria set out in the NPPF.</i></p> <p><b><i>This policy contributes towards achieving Objectives 1, 2, 3 4, 5, 6, 7 and 9.</i></b></p>	<p>(3) Developed from Policy INF2 1. Specific reference to transport assessments and cumulative impacts of development.</p> <p>(3a) Widening the definition to include the transport network as a whole which could be affected.</p> <p>(3b&amp; 3c) Terminology changed from vicinity to zone of influence to clarify where reasonable impacts should be assessed.</p> <p>(4) Developed from Policy INF1 2. Reworded to allow travel plans to be requested in a broader range of circumstances.</p>



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PMM0082	Explanation 5.2.7 - 5.2.8	<p>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 <del>Criterion vii 'Movement and connectivity'</del> sets out the approach to sustainable travel modes and choice in new development <i>in regards to masterplanning, design and layout.</i></p> <p>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 <del>Paragraph 32</del> 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.</p> <p><i>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.</i></p>	<p>Clarify link between transport policy and SD5</p> <p>Removal of specific policies in the NPPF to be consistent with the rest of the JCS.</p> <p>Further explanation of the role of travel plans to support policy.</p> <p>Removal of specific policies in the NPPF to be</p>

### JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
			consistent with the rest of the JCS.
PMM0083	Delivery 5.2.11	<p>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 (<a href="http://www.gloucestershire.gov.uk">www.gloucestershire.gov.uk</a>) and are periodically updated and added to ensure they remain fit for purpose.</p> <ul style="list-style-type: none"> <li> <span style="color: red;">•</span> <del>Local Developer Guide 2013</del> – provides a brief overview for developers on the type of infrastructure considerations that should be taken into account when making a planning application         </li> <li> <span style="color: red;">•</span> <b>Local Transport Plan 2012-2026 2015-2031</b> – provides an overview of the strategic context of the transport network within the county, <i>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 the JCS plan period, including future reviews.</i> </li> <li> <span style="color: red;">•</span> <b>Local Developer Guide 2013</b> – <i>provides a brief overview for developers on the type of infrastructure considerations that should be taken into account when making a planning application</i> </li> </ul>	<p>Text on Local Developer Guide moved below LTP point.</p> <p>Further explanation of role of the LTP.</p>

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
PMM0084	<b>Policy INF3</b> 5.3.2	<p>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.</p> <p><i>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.</i></p>	To clarify ongoing flood defence work in Gloucester city
PMM0085	Explanation <b>5.3.5</b>	<p>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 (<i>LLFA</i>), prepared a SFRA Level 1 for the county (September 2008). This assessed all forms of flood risk: fluvial (rivers), tidal (sea), surface water, groundwater, sewers and impounded water bodies (reservoirs and canals), in the context of the situation at the time and taking into account the likely impacts of climate change in the future. Gloucestershire County Council also produces Surface Water Management Plans which seek to identify areas more vulnerable to surface water flooding and indicate measures to mitigate this, recognising that it is not economically viable to eliminate flooding altogether.</p>	
PMM0086	5.3.7 Bullet point 4	<ul style="list-style-type: none"> <li>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. <i>For more information see the LLFA guidance on SuDS</i></li> </ul>	

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
PMM0087	Delivery After 5.3.15	<i>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'</i>	Signposting to latest guidance on SuDS.
PMM0088	Policy INF4 Explanation 5.4.6 & 7	<p>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. <i>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.</i></p> <p>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.</p> <p>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. <i>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.</i> 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]). <i>The JCS authorities will work together with key stakeholders, such as Natural England and the Environmental Agency, to develop management and mitigation packages for important green and ecological networks and to discuss how future development can contribute to this.</i> 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</p>	<p>Signposting the potential regional park</p> <p>Text added to reflect submissions by Natural England.</p>

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		strategic/landscape level. Development at Strategic Allocations will need to deliver connectivity through the site, linking urban areas with the wider rural hinterland.	
PMM0089	Delivery After 5.4.12	<i>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.</i>	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. <i>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.</i>	Providing an update on ongoing social sustainability initiatives in the JCS area
PMM0091	Policy INF6 Background 5.6.3 – 5.6.5	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. <del>Wind farm development in particular has been perceived as visually intrusive, although generally wind generation is supported by the vast majority of the population (NOP DTI commissioned survey 2006).</del>  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	

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p>importantly for the JCS, retaining money within the local economy. Installation of plant can also support local job creation.</p> <p><del>This policy</del> <i>Policy INF6</i> 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. <i>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.</i></p>	<p>Potential wind farm development will now be addressed through District –level plans in accordance with national guidance.</p>
PMM0092	INF6 5.6.3 – 5.6.5	<p>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. <del>Wind farm development in particular has been perceived as visually intrusive, although generally wind generation is supported by the vast majority of the population (NOP DTI commissioned survey 2006).</del></p> <p><del>This</del> Policy <i>INF6</i> 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. <i>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.</i></p>	<p>Potential wind farm development will now be addressed through District –level plans in accordance with national guidance.</p>
PMM0093	INF6 Policy	Policy INF6: Renewable Energy/Low Carbon Energy Development	

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
	Number 1 in point iii.	<p>1. Proposals for the generation of energy from renewable resources, or low carbon energy development <i>(with the exception of wind turbines)</i>, 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:</p> <p style="padding-left: 40px;">Any unacceptable adverse impacts on users and residents of the local area, including emissions, noise, odour and visual amenity, <del>including shadow flicker.</del></p>	<p>Potential wind farm development will now be addressed through District –level plans in accordance with national guidance.</p> <p>Shadow flicker relates primarily to wind turbines.</p>
PMM0094	Explanation 5.6.8	<p>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. <del>It established that 10% on site energy generation was feasible in most development scenarios, which has been set out in Policy SD4.</del> 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.</p>	<p>See changes to SD4 which removes this target in accordance with national guidance</p>
PMM0095	<b>Policy INF7</b> Background 5.7.1	<p>Government says that <i>'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.'</i> (National Infrastructure Delivery Plan 2016–2021 Executive Summary.) <del>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)</del> 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.</p>	<p>Update to the National Infrastructure Plan wording</p>
PMM0096	Policy	<b>Policy INF7: Infrastructure Delivery</b>	

**JCS Table of Main Modifications**

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p>1. Where need is <i>infrastructure requirements are</i> generated as a result of individual site proposals and/or as a consequence of <i>having regard to</i> 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 <i>been</i> given, where appropriate, to implementing the requirements of the Joint Core Strategy Infrastructure Delivery Plan.</p> <p>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 <del>and proportionate</del> infrastructure provision in respect of <i>which is necessary, directly related, and fairly and reasonably related to the scale and kind of the development proposal, including:</i></p> <ul style="list-style-type: none"> <li>i. <del>Affordable housing</del> <i>Broadband infrastructure</i></li> <li>ii. Climate change mitigation/adaptation</li> <li>iii. Community <i>and cultural</i> facilities <i>and initiatives</i></li> <li>iv. Early Years and Education</li> <li>v. Health and well-being facilities</li> <li>vi. The highway network, traffic management, sustainable transport and disabled people's access</li> <li>vii. Protection of cultural and heritage assets and the potential for their enhancement</li> <li>viii. Protection of environmental assets and the potential for their enhancement</li> <li>ix. Provision of Green Infrastructure including open space</li> <li>x. Public realm, and</li> <li>xi. Safety and security including emergency services</li> <li>xii. Flood risk management infrastructure</li> </ul> <p>This list <i>of potential infrastructure items</i> is neither exhaustive, <i>sequential</i> nor are its elements mutually exclusive.</p>	<p>(1) Wording change to assist readability and increase plan flexibility</p> <p>Changes to wording to reflect national guidance (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 vision 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.</p>



## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
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 provision and maintenance, <i>that is</i> fully justified within the <i>planning</i> 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' <i>include development of all scales and types.</i> <del>Policy INF7 are not necessarily subject to considerations of scale.</del>	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. <i>This includes the Gloucestershire County Council 'Local Developer Guide: Infrastructure &amp; Services with New Development' (adopted February 2013).</i> There are several policies elsewhere in the JCS that directly or indirectly relate to the provision of infrastructure. <del>including all those in park 5 Infrastructure Policies.</del> Prospective Developers should read the JCS as a whole.	Signposting readers to the Gloucestershire Document Altered to improve clarity
PMM0099	<b>Policy INF8</b> Policy	<b>Policy INF8: Developer Contributions</b> <b>1.</b> 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	Policy INF 8 "Financial contributions..." to aid

**JCS Table of Main Modifications**

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p>before the grant of planning permission. <i>Financial contributions will be sought through the S106 and CIL mechanisms as appropriate.</i></p> <p>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. <del>The submitted assessment and its methodology may be independently appraised.</del> <i>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.</i></p>	<p>clarity and make clear S106 or CIL mechanisms could be used.</p> <p>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.</p>
PMM0100	After 5.8.5	<i>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.</i>	As above, explanatory text related to the need to publish viability assessments for non policy compliant schemes.
PMM0101	<b>Policy SA1</b> 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.	

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p>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.</p> <p>The Strategic Allocations Report details the process by which the approximate capacity of the sites in Table SA1 was calculated, <i>except for allocations at Winnycroft and West Cheltenham. The capacity of these sites has been informed through the JCS evidence base as it progressed after submission</i> . 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.</p>	<p>Updated for new strategic allocations not previously covered by the Strategic Allocations report.</p>
PMM0102	Policy	<p><b>Policy SA1: Strategic Allocations Policy</b></p> <ol style="list-style-type: none"> <li>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.</li> <li>2. The Strategic Allocations are listed in Table SA1 and delineated on Plans A1-A119 below and are marked on the <i>proposals map</i> <del>proposed submission policies map</del>. The red lines on Plans A1–A119 (not including <i>A2, A6 and A7 which have been removed from the JCS</i>) mark the boundaries of the allocations and are separately and collectively part of this policy.</li> <li>3. <i>Each Strategic Allocation is supported by site specific policies A1-A11 (not including A2, A6 and A7 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.</i></li> </ol>	<p>(2) Changes to reflect new and removed sites and numbering.</p> <p>(3) Addition to policy to link to new individual site policies which are parts of the whole SA1 policy.</p> <p>(4) Policy point altered to remove infrastructure which is dealt with in more detail under a specific policy point.</p>

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p><i>3. 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.</i></p> <p>4. Proposals must be accompanied by a comprehensive masterplan for the <i>entire</i> Strategic Allocation. This should demonstrate how new development will integrate with and complement its surroundings in an appropriate manner, in accordance with Policy SD5.</p> <p><del>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.</del></p> <p>5. 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 <i>and relevant national guidance</i> Paragraph 77 whilst delivering the scale and distribution of development required by this policy. This is in addition to the requirements of Policy INF4.</p> <p><del>6. Development proposals should enable a comprehensive scheme to be delivered across the developable area within each Strategic Allocation. <i>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.</i></del></p> <p><del>7. 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.</del></p>	<p>(5) Clarification to make clear that policy points apply to the whole red line boundary of a Strategic Allocation.</p> <p>(former point 4) Requirement for gypsy and traveller provision removed and dealt with under Policy SD14.</p> <p>(6) Removed restriction of only applying to Strategic Allocations which include residential development and reworded for clarity.</p> <p>(7) Reinforcing the need for a comprehensive approach to infrastructure provision across Strategic Allocations.</p> <p>(9) To emphasise the need for Strategic Allocations to address transport impact and sustainable transport modes.</p>

### JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason																																
		<p><i>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.</i></p> <p><b>This policy contributes towards achieving Objectives 1, 2, 4, 6, 7, 8 and 9</b></p>																																	
PMM0103	Table SA 1	<p><b>Table SA 1</b></p> <table border="1"> <thead> <tr> <th></th> <th>Indicative Housing Site Total</th> <th>Indicative Housing to be delivered up to 2031</th> <th>Hectares of Employment Land to be delivered up to 2031</th> </tr> </thead> <tbody> <tr> <td>A1 Innsworth</td> <td><del>1300</del> 1250</td> <td><del>1300</del> 1250</td> <td>9.1</td> </tr> <tr> <td><i>A1a Twigworth</i></td> <td><i>1363</i></td> <td><i>1363</i></td> <td>N/A</td> </tr> <tr> <td>A2 North Churchdown</td> <td>532</td> <td>532</td> <td>N/A</td> </tr> <tr> <td>A3 South Churchdown</td> <td><del>1100</del> 868</td> <td><del>1100</del> 868</td> <td>17.4</td> </tr> <tr> <td>A4 North Brockworth</td> <td>1500</td> <td>1500</td> <td><del>3</del> N/A</td> </tr> <tr> <td>A5 North West Cheltenham</td> <td><del>4285</del> 4785</td> <td><del>4285</del> 4785</td> <td>23.4</td> </tr> <tr> <td>A6 South Cheltenham Leckhampton</td> <td>1124</td> <td>1124</td> <td>N/A</td> </tr> </tbody> </table>		Indicative Housing Site Total	Indicative Housing to be delivered up to 2031	Hectares of Employment Land to be delivered up to 2031	A1 Innsworth	<del>1300</del> 1250	<del>1300</del> 1250	9.1	<i>A1a Twigworth</i>	<i>1363</i>	<i>1363</i>	N/A	A2 North Churchdown	532	532	N/A	A3 South Churchdown	<del>1100</del> 868	<del>1100</del> 868	17.4	A4 North Brockworth	1500	1500	<del>3</del> N/A	A5 North West Cheltenham	<del>4285</del> 4785	<del>4285</del> 4785	23.4	A6 South Cheltenham Leckhampton	1124	1124	N/A	Table modified to reflect the removal and inclusion of Strategic Allocations and to update with latest capacity figures.
	Indicative Housing Site Total	Indicative Housing to be delivered up to 2031	Hectares of Employment Land to be delivered up to 2031																																
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### JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes				Reason								
		A8 MOD Site at Ashchurch	2725 ( <del>2125 up to 2031</del> )	2125	20 * * (this is replacement of existing use)									
		A9 Ashchurch	N/A	N/A	14.3									
		<i>A10 Winneycroft</i>	<i>620</i>	<i>620</i>	<i>N/A</i>									
		<i>A11 West Cheltenham</i>	<i>1100</i>	<i>1100</i>	<i>45</i>									
		<b>Total</b>	<del>13,993</del> <b>12,784</b>	<del>12,284</del> <b>13,393</b>	<del>64.2</del> <b>129.2</b>									
PMM0104	6.1.4	<p>Proposals for development at Strategic Allocations must have regard to all relevant planning policies in the plan as well as Policy SA1, <i>including site specific policies A1-A11</i>. The JCS identifies a number of specific requirements for Strategic Allocations and other major developments, which include the following:</p> <table border="1" data-bbox="719 978 1581 1297"> <thead> <tr> <th data-bbox="719 978 835 1050">Policy</th> <th data-bbox="835 978 1581 1050">Requirement</th> </tr> </thead> <tbody> <tr> <td data-bbox="719 1050 835 1121">SD3</td> <td data-bbox="835 1050 1581 1121">The provision of new local centres of an appropriate scale to provide for the everyday needs of new communities.</td> </tr> <tr> <td data-bbox="719 1121 835 1193">SD4</td> <td data-bbox="835 1121 1581 1193">Major planning applications must be accompanied by a waste minimisation statement and an Energy Statement.</td> </tr> <tr> <td data-bbox="719 1193 835 1297">SD5</td> <td data-bbox="835 1193 1581 1297">Policy SD5 sets out design requirements including masterplanning. Masterplans are required for all Strategic Allocations by Policy SA1.</td> </tr> </tbody> </table>				Policy	Requirement	SD3	The provision of new local centres of an appropriate scale to provide for the everyday needs of new communities.	SD4	Major planning applications must be accompanied by a waste minimisation statement and an Energy Statement.	SD5	Policy SD5 sets out design requirements including masterplanning. Masterplans are required for all Strategic Allocations by Policy SA1.	<p>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.</p>
Policy	Requirement													
SD3	The provision of new local centres of an appropriate scale to provide for the everyday needs of new communities.													
SD4	Major planning applications must be accompanied by a waste minimisation statement and an Energy Statement.													
SD5	Policy SD5 sets out design requirements including masterplanning. Masterplans are required for all Strategic Allocations by Policy SA1.													

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes		Reason
		SD7	Planning applications will be supported by a Landscape and Visual Impact Assessment where, at the discretion of the local planning authority, one is required.	
		SD9	Development proposals at Strategic Allocations must have regard to the findings and recommendations of the JCS Historic Environment Assessment (or any subsequent revision).	
		SD14	Policy SD14 sets criteria for proposals for new Gypsy, Traveller and Travelling Showpeople sites. Policy SA1 requires proposals at Strategic Allocations to consider provision of these sites at these locations.	
		SD15	Proposals for development at Strategic Allocations must be accompanied by a health impact assessment.	
		INF3	The cumulative impact of the proposed development on flood risk in relation to existing settlements, communities or allocated sites must be assessed and effectively mitigated.	
		INF4	Development at Strategic Allocations will be required to deliver connectivity through the site linking urban areas with the wider rural hinterland.	
PMM0105		<p><b>Strategic Allocations <i>Policies &amp; Maps</i> Information</b></p> <p>Red line plans and descriptions</p> <p>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 <i>development or</i> redevelopment are included within</p>		<p>Reworded to improve clarity and emphasise the introduction of site specific policies.</p>

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p>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.</p> <p><i>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.</i></p> <p>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. <del>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.</del> <i>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 infrastructure requirements.</i></p>	
PMM0106	Plan A1 Innsworth	<p><b><i>POLICY A1 - Innsworth &amp; Twigworth</i></b></p> <p><i>The Strategic Allocation identified at Innsworth &amp; Twigworth (as shown on Proposals Map Plan A1) will be expected to deliver:</i></p> <ul style="list-style-type: none"> <li><i>i. Approximately 2,600 new homes</i></li> <li><i>ii. Approximately 9 hectares of employment generating land</i></li> <li><i>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</i></li> <li><i>iv. New primary and secondary education schools and facilities</i></li> <li><i>v. A green infrastructure network of approximately 100 hectares, corresponding with flood zones 2 and 3.</i></li> <li><i>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.</i></li> <li><i>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.</i></li> </ul>	<p>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.</p>



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Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p><i>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.</i></p> <p><i>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.</i></p> <p><i>x. A layout and form that integrates, where appropriate, important hedgerows within the development.</i></p> <p><i>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.</i></p> <p><i>xii. Primary vehicle accesses from A38, Innsworth Lane and explore the potential for a new main junction onto the A40 to the south of the site.</i></p> <p><i>xiii. The potential for a highway link through both the Innsworth and Twigworth sites linking the A38 and A40.</i></p> <p><i>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.</i></p> <p><i>xv. High quality public transport facilities and connections within and adjacent to the site</i></p> <p><i>xvi. Safe, easy and convenient pedestrian and cycle links within the site and to key centres, providing segregated links where practical.</i></p>	
PMM0107	Plan A1 Innsworth	<p><b>Plan A1 – Innsworth &amp; Twigworth</b></p> <p>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, <i>Down Hatherley Lane</i> <del>the Hatherley Brook and its associated floodplain</del> to the north, and Frogfurlong Lane and Imjin Barracks to the east. The residential settlement of Innsworth lies to the south of the site <i>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</i> <del>A</del> Site of Special Scientific Interest. <del>is situated within the Strategic Allocation to the north west of the site.</del></p>	Site description amended to include reference to the Twigworth site.
PMM0108	Plan A2 North Churchdown	<p><del><b>Plan A2 – North Churchdown</b></del></p> <p><del>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</del></p>	Site removed as a strategic allocation.

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<del>Brook and the Gloucestershire Airport to the north east. The site is located to the north of the built up area of Churchdown village.</del>	
PMM0109	Plan A3 South Churchdown	<p><b><i>POLICY A3 - South Churchdown</i></b></p> <p><i>The Strategic Allocation identified at South Churchdown (as shown on Proposals Map Plan A3) will be expected to deliver:</i></p> <ul style="list-style-type: none"> <li><i>i. Approximately 1,100 new homes.</i></li> <li><i>ii. Approximately 17 hectares of employment generating land.</i></li> <li><i>iii. Provision of an appropriate scale of retail, healthcare and community facilities to meet the needs of the new community.</i></li> <li><i>iv. Contribution to primary and secondary education schools and facilities</i></li> <li><i>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.</i></li> <li><i>vi. A landscape buffer along the route of the A40 and the railway line including the protection of views from Tinkers Hill/Churchdown Hill.</i></li> <li><i>vii. Protection to key biodiversity assets, including Innsworth Ditch and the safeguarding of the ponds and associated biodiversity at Pirton Court.</i></li> <li><i>viii. Adequate flood risk management across the site and ensure that all vulnerable development is located wholly within flood zone 1.</i></li> <li><i>ix. A layout and form of development that respects the landscape character and separation of the villages Churchdown, Innsworth, Longlevens and Elmbridge.</i></li> <li><i>x. A layout and form of development that respects the character and setting of Pirton Farmhouse and Barn.</i></li> <li><i>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.</i></li> </ul>	<p>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.</p>

**JCS Table of Main Modifications**

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p><i>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.</i></p> <p><i>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.</i></p> <p><i>xiv. High quality public transport facilities and connections within and adjacent to the site</i></p> <p><i>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.</i></p> <p><i>xvi. Safeguard land for an extension to the planned park and ride facility at Elmbridge.</i></p>	
PMM0110	Plan A4 – North Brockworth	<p><b><i>POLICY A4 - North Brockworth</i></b></p> <p><i>The Strategic Allocation identified at North Brockworth (as shown on Proposals Map Plan A4) will be expected to deliver:</i></p> <p><i>i. Approximately 1,500 new homes.</i></p> <p><i>ii. Approximately 3 hectares of employment generating land.</i></p> <p><i>iii. Provision of an appropriate scale of retail, healthcare and community facilities to meet the needs of the new community.</i></p> <p><i>iv. New primary and secondary education schools and facilities</i></p> <p><i>v. A green infrastructure network of approximately 27 hectares including provision across the A46 and along Court Road towards Churchdown and along Horsbere Brook.</i></p> <p><i>vi. The retention of the small traditional orchard to the east of the allocation.</i></p> <p><i>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.</i></p> <p><i>viii. Adequate flood risk management across the site and ensure that all vulnerable development is located wholly within flood zone 1.</i></p> <p><i>ix. Protection to key biodiversity assets, including facilitating the active management of Horsbere Brook.</i></p> <p><i>x. Primary vehicle accesses from Delta Way, Valiant Way and Court Road.</i></p>	<p>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.</p>

**JCS Table of Main Modifications**

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<ul style="list-style-type: none"> <li><i>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.</i></li> <li><i>xii. High quality public transport facilities and connections within and adjacent to the site</i></li> <li><i>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.</i></li> </ul>	
PMM0111	Plan A5 North West Cheltenham	<p><b><i>POLICY A5 - NORTH WEST CHELTENHAM</i></b></p> <p><i>The Strategic Allocation identified at North West Cheltenham (as shown on Proposals Map Plan A5) will be expected to deliver:</i></p> <ul style="list-style-type: none"> <li><i>i. Approximately 4,285 new homes</i></li> <li><i>ii. Approximately 23 hectares of employment generating land, including a 10 hectare B-class office park</i></li> <li><i>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,</i></li> <li><i>iv. New primary and secondary education schools and facilities</i></li> <li><i>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.</i></li> <li><i>vi. Protection to key biodiversity assets including through the development of a Biodiversity Management Plan.</i></li> <li><i>vii. Adequate flood risk management across the site and ensure that all vulnerable development is located wholly within flood zone 1.</i></li> <li><i>viii. A layout and form of development that respects the landscape character and separation of the villages of Brockhampton, Elmstone Hardwicke, Swindon and Uckington.</i></li> <li><i>ix. A layout and form that respects the character and setting of heritage assets that may be affected by development.</i></li> <li><i>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</i></li> <li><i>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.</i></li> </ul>	<p>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.</p>

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p><i>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.</i></p> <p><i>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.</i></p> <p><i>xiv. Safe, easy and convenient pedestrian and cycle links within the site and to key centres, providing segregated links where practical.</i></p> <p><i>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.</i></p>	
PMM0112	Plan A6 South Cheltenham Leckhampton	<p><del><b>Plan A6 – South Cheltenham – Leckhampton</b></del></p> <p>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.</p>	Site removed as a strategic allocation.
PMM0113	Plan A7 South Cheltenham Up Hatherley Way	<p><del><b>Plan A7 – South Cheltenham – Up Hatherley Way</b></del></p> <p>Removed.</p>	Site removed as a strategic allocation at Pre-Submission stage.
PMM0114	Plan A8 MoD Ashchurch	<p><b><i>POLICY A8 - MoD Ashchurch</i></b></p> <p><i>The Strategic Allocation identified at Mod Ashchurch (as shown on Proposals Map Plan A8) will be expected to deliver:</i></p> <p><i>i. Approximately 2,725 new homes with 2,125 to delivered within the plan period to 2031.</i></p> <p><i>ii. Approximately 20 hectares of employment generating land.</i></p>	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

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p>iii. <i>Local centre including the provision of an appropriate scale of retail, healthcare and community facilities to meet the needs of the new community.</i></p> <p>iv. <i>New primary and secondary education schools and facilities</i></p> <p>v. <i>A green infrastructure network which retains the existing railway siding as a green corridor providing a pedestrian and cycle link through the site. and facilities for the quiet enjoyment of the environment to help reduce pressure on the neighbouring habitats of Carrant Brook and its immediate environs.</i></p> <p>vi. <i>A broad-leaf woodland belt at the northern and eastern boundaries of the site to minimise harm to views from Bredon Hill and the Cotswolds and to provide landscape benefits within the wider Carrant Vale.</i></p> <p>vii. <i>A layout and form that respects the character and setting of heritage assets centred around the Church of St. Nicholas.</i></p> <p>viii. <i>A layout and form that integrates, where appropriate, historically important hedgerows within the development.</i></p> <p>ix. <i>Adequate flood risk management across the site and ensure that all vulnerable development is located wholly within flood zone 1.</i></p> <p>x. <i>Primary vehicle accesses from the A46, discouraging the use of vehicular traffic along the B4079 towards Bredon and along Grange Road towards the level crossing to Northway.</i></p> <p>xi. <i>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 includes considering the operation of the strategic road network and future highway improvements to the A46.</i></p> <p>xii. <i>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.</i></p> <p>xiii. <i>Safe, easy and convenient pedestrian and cycle links within the site and to key centres and the railway station, providing segregated links where practical.</i></p> <p>xiv. <i>A strategy for dealing with contaminated land including a remediate scheme and the implementation thereof prior to the commencement of development, verification scheme, the reporting of unexpected contamination and the proposals for long-term monitoring and maintenance.</i></p>	<p>base and is what is considered necessary to enable sustainable development.</p>

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Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p><i>It is recognized that this site presents specific challenges in the potentially complex nature of the remediation required for the MoD and includes the removal of existing buildings. However, although a pragmatic approach will be taken to the delivery of this site as regards infrastructure and affordable housing, this will be on the basis of a specific viability assessment in respect of the site and the vacant building credit policy in respect of affordable housing requirements contained within the national Planning Practice Guidance, or other relevant national policy or guidance, will not apply to this site as the allocation of this site has been on the basis and tested without the application of such a policy.</i></p>	
PMM0115	Plan A9 Ashchurch	<p><b><i>POLICY A9 - Ashchurch</i></b></p> <p><i>The Strategic Allocation identified at Ashchurch (as shown on Proposals Map Plan A9) will be expected to deliver:</i></p> <ul style="list-style-type: none"> <li><i>i. Approximately 14 hectares of employment generating land.</i></li> <li><i>ii. A green infrastructure network of approximately 5 hectares including a green corridor along the route of the Tirlle Brook and a woodland belt at the southern boundary of the site to minimise harm to views from Oxenton Hill.</i></li> <li><i>iii. Adequate flood risk management across the site and ensure that all vulnerable development is located wholly within flood zone 1.</i></li> <li><i>iv. Primary vehicle access from the A46 and a secondary access from Fiddington Lane.</i></li> <li><i>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.</i></li> <li><i>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.</i></li> <li><i>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.</i></li> <li><i>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.</i></li> </ul>	<p>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</p>

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
PMM0116	Strategic Allocations Information	<p><b><i>POLICY A10 - Winneycroft</i></b></p> <p><i>The Strategic Allocation identified at Winneycroft (as shown on Proposals Map Plan A10) will be expected to deliver:</i></p> <ul style="list-style-type: none"> <li><i>i. Approximately 620 new homes</i></li> <li><i>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.</i></li> <li><i>iii. Areas of informal and formal recreation space on-site including the provision of permanent changing facilities.</i></li> <li><i>iv. Adequate flood risk management across the site, including betterment works to the Sudbrook to provide downstream attenuation.</i></li> <li><i>v. A layout and form that integrates, where appropriate, important hedgerows within the development.</i></li> <li><i>vi. A layout and form that respects the landscape character of the edge of city setting and the transition to suburban and rural character to south and east of the site.</i></li> <li><i>vii. A layout and form that respects the setting of the heritage asset at Winneycroft Farm and the adjacent historic orchard area.</i></li> <li><i>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.</i></li> <li><i>ix. Primary vehicle accesses from Corncroft Lane and Winneycroft Lane.</i></li> <li><i>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.</i></li> <li><i>xi. High quality public transport facilities and connections within and adjacent to the site.</i></li> <li><i>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.</i></li> </ul>	<p>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</p>
PMM0117	Strategic Allocations Information	<p><b><i>PLAN A10 - Winneycroft</i></b></p> <p><i>Winneycroft 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 Winneycroft 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.</i></p>	<p>Site description added for Winneycroft Strategic Allocation</p>



**JCS Table of Main Modifications**

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
PMM0118	Strategic Allocations Information	<p><b><i>POLICY A11 – West Cheltenham</i></b></p> <p><i>The Strategic Allocation identified at West Cheltenham (as shown on Proposals Map Plan A11) will be expected to deliver:</i></p> <ul style="list-style-type: none"> <li><i>i. Approximately 1,100 new homes</i></li> <li><i>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</i></li> <li><i>iii. All development should be employment led, delivery of housing must be in tandem with employment development</i></li> <li><i>iv. A comprehensive masterplan and development strategy for the strategic allocation, set within the context of the safeguarded land at West Cheltenham, which includes:</i> <ul style="list-style-type: none"> <li><i>a. a delivery strategy for employment focussed land release</i></li> <li><i>b. a positive impact on the regeneration of neighbourhoods in west Cheltenham</i></li> <li><i>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.</i></li> <li><i>v. Primary vehicle accesses from Fiddlers Green Lane and B4634 Old Gloucester Road.</i></li> <li><i>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.</i></li> <li><i>vii. High quality public transport facilities and connections within and adjacent to the site.</i></li> <li><i>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</i></li> <li><i>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</i></li> </ul> </li> </ul>	<p>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</p>

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<i>x. A landscape buffer to the western boundary of the site which will provide screening between the development and the Hayden sewage treatment works.</i>	
PMM0119	Strategic Allocations Information	<b>PLAN A11 – West Cheltenham</b>  <i>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.</i>	Site description added for West Cheltenham Strategic Allocation
PMM0120	Indicative site layouts	<b>Indicative site layouts</b>  <del>The indicative site layouts have not yet been revised following draft JCS consultation. New, more indicative and diagrammatic place-shaping layouts will replace these graphics to indicate our work on options for identifying sustainable and achievable developments on the sites. These layouts have been generated using only a specific set of constraints as set out in Strategic Allocations Report and therefore are subject to these limitations. These layouts will not be included in policy and are intended only as guidance.</del>	Deleted as the Indicative site layouts have now been revised to take into account the outputs of the examination sessions and from the Interim Report.
PMM0121	Part 7 Monitoring & Review	<b>PART 7 – Delivery, <i>Monitoring &amp; Review</i></b>  <i>Delivery (including Housing Implementation Strategy)</i>  <i>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.</i>	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
		<p><i>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.</i></p> <p><i>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.</i></p>	
PMM0122	7.1 7.2 7.3 7.4	<p><b>Monitoring Background</b></p> <p>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.</p> <p>The NPPF sets out that plans should be flexible to adapt to changing circumstances. <del>As detailed in the introduction to this plan,</del> 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.</p> <p>In order to ensure effective monitoring, a <b>Monitoring</b> Framework has been prepared, setting out key indicators that will track the delivery of the plan.</p>	<p>Section moved from the Introduction and expanded</p> <p>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.</p> <p>Provides for clarification as AMR's are no longer required annually.</p>

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<p>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 <i>relevant national</i> indicators <del>required by Government as part of the ‘Single List’, ‘Contextual Indicators’ (CI) which relate to local characteristics and issues of the locality</del> and other ‘Local Indicators’ such as those from the Local Transport Plan (LTP).</p> <p><i>The monitoring outcomes will be reported through a single JCS Authority Monitoring Report (AMR) which will be regularly updated.</i> <del>The monitoring outcomes for each Development Plan Document will be reported in each Authority’s Monitoring Report (AMR).</del> 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.</p> <p><i>The NPPF requires plans to be flexible and responsive to change. If monitoring indicates that delivery problems are emerging or that circumstances are changing in other ways, the JCS authorities will consider implementing some or all the following measures to bring forward development:</i></p> <ul style="list-style-type: none"> <li><i>• working with developers and infrastructure providers to remove obstacles to the delivery of sites</i></li> <li><i>• seeking alternative sources of funding if problems with infrastructure provision is delaying development of key strategic sites</i></li> <li><i>• the early release of safeguarded land</i></li> <li><i>• 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</i></li> </ul>	

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
		<ul style="list-style-type: none"> <li><i>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.</i></li> </ul>	
PMM0123	Part 7 Monitoring & Review	<p><i>Review</i></p> <p><i>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. .</i></p> <p><i>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.</i></p> <p><i>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 out in the XXX), this will trigger the need for the consideration of a partial or full JCS review.</i></p> <p><i>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.</i></p> <p><i>“We will work together to achieve ... core strategies and local plans ... and coordination of plan reviews by 2020” (Gloucestershire Devolution Bid - September 2015)</i></p> <p><i>7.13 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.</i></p>	<p>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.</p>

## JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason
PMM0124	Part 7 Monitoring & Review	<p><i>Trajectories</i></p> <p><i>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.</i></p> <p><i>Then again for each Council is a chart which graphically illustrate the requirement versus completions on a cumulative basis.</i></p> <p><i>For each Council, the 5 years supply calculation is provided.</i></p> <p><b><i>Approach to Previous Delivery Shortfalls Against the Housing Requirement</i></b></p> <p><i>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 real merit in using the Liverpool approach and spreading the shortfall across the plan period.</i></p> <p><i>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):</i></p> <p><i>“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.”</i></p>	This text is from the draft HIS – and would remain the HIS on issuing.

### JCS Table of Main Modifications

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		<p><i>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.</i></p> <p><i>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.</i></p> <p><i>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).</i></p>	
PMM0125	Part 7 Monitoring & Review	<p><i>Gloucester</i></p> <p><i>The chart 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 2 years of the plan period shows the shortfall.</i></p>	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
		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	
		2011-12	591	0	591	591	718	718	-127	718
		2012-13	433	0	433	1024	718	1436	-412	724
		2013-14	477	0	477	1501	718	2154	-653	740
		2014-15	554	0	554	2055	718	2872	-817	754
		2015-16	471	0	471	2526	718	3590	-1064	766
		2016-17	499	0	499	3025	718	4308	-1283	785
		2017-18	741	75	816	3841	718	5026	-1185	804
		2018-19	689	250	939	4780	718	5744	-964	803
		2019-20	761	400	1161	5941	718	6462	-521	792
		2020-21	567	450	1017	6958	718	7180	-222	761
		2021-22	524	600	1124	8082	718	7898	184	738
		2022-23	451	625	1076	9158	718	8616	542	700
		2023-24	273	600	873	10031	718	9334	697	658
		2024-25	89	600	689	10720	718	10052	668	631
		2025-26	64	600	664	11384	718	10770	614	623
		2026-27	64	595	659	12043	718	11488	555	616
		2027-28	64	475	539	12582	718	12206	376	607
		2028-29	64	400	464	13046	718	12924	122	624
		2029-30	64	163	227	13273	718	13642	-369	677
		2030-31	64	50	114	13387	718	14360	-973	903



JCS Table of Main Modifications

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		2011-12	33	0	33	33	450	450	-417	450
		2012-13	267	0	267	300	450	900	-600	429
		2013-14	413	0	413	713	450	1350	-637	418
		2014-15	316	0	316	1029	450	1800	-771	415
		2015-16	397	0	397	1426	450	2250	-824	405
		2016-17	526	0	526	1952	450	2700	-748	399
		2017-18	418	75	493	2445	450	3150	-705	400
		2018-19	440	340	780	3225	450	3600	-375	400
		2019-20	433	310	743	3968	450	4050	-82	421
		2020-21	487	310	797	4765	450	4500	265	443
		2021-22	471	335	806	5571	450	4950	621	474
		2022-23	282	360	642	6213	633	5583	630	512
		2023-24	238	360	598	6811	633	6216	595	703
		2024-25	218	485	703	7514	633	6849	665	707
		2025-26	188	580	768	8282	633	7482	800	728
		2026-27	140	580	720	9002	633	8115	887	766
		2027-28	83	510	593	9595	633	8748	847	810
		2028-29	93	380	473	10068	633	9381	687	845
		2029-30	79	380	459	10527	633	10014	513	862
		2030-31	92	380	472	10999	633	10647	352	890

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		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	
		2011-12	318	0	318	318	495	495	-177	495
		2012-13	462	0	462	780	495	990	-210	460
		2013-14	513	0	513	1293	495	1485	-192	453
		2014-15	580	0	580	1873	495	1980	-107	457
		2015-16	633	0	633	2506	495	2475	31	474
		2016-17	693	0	693	3199	495	2970	229	501
		2017-18	551	0	551	3750	495	3465	285	541
		2018-19	562	25	587	4337	495	3960	377	552
		2019-20	494	175	669	5006	495	4455	551	570
		2020-21	485	200	685	5691	495	4950	741	605
		2021-22	248	225	473	6164	495	5445	719	643
		2022-23	142	250	392	6556	495	5940	616	639
		2023-24	110	175	285	6841	495	6435	406	618
		2024-25	110	200	310	7151	495	6930	221	576
		2025-26	110	225	335	7486	495	7425	61	539
		2026-27	110	225	335	7821	495	7920	-99	507
		2027-28	110	225	335	8156	495	8415	-259	475
		2028-29	110	225	335	8491	495	8910	-419	443
		2029-30	110	225	335	8826	495	9405	-579	411
		2030-31	110	250	360	9186	495	9900	-714	379

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<b>Total Delivery</b>	<b>12530</b>	<b>0</b>	<b>150</b>	<b>590</b>	<b>835</b>	<b>910</b>	<b>1035</b>	<b>1085</b>	<b>985</b>	<b>1135</b>	<b>1255</b>	<b>1250</b>	<b>1060</b>	<b>855</b>	<b>705</b>	<b>680</b>																																																																																																																																																																														
PMM0129	Monitoring Framework	<i>Monitoring Framework</i>	Section updated to reflect the JCS Modifications and the removal of those																																																																																																																																																																																											



### JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	Reason																																
		<p><i>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.</i></p> <table border="1" data-bbox="582 494 1444 1378"> <thead> <tr> <th colspan="4" data-bbox="582 494 1444 526"><b>Building a strong and competitive urban economy</b></th> </tr> <tr> <th data-bbox="582 531 855 563">Indicator</th> <th data-bbox="862 531 1120 563">Target</th> <th data-bbox="1126 531 1294 563">Source</th> <th data-bbox="1301 531 1444 563">Period</th> </tr> </thead> <tbody> <tr> <td data-bbox="582 568 855 695">Net additional jFobs created by sector (employment generating uses)</td> <td data-bbox="862 568 1120 695">A minimum of <del>28,000</del> <b>39,500</b> jobs created over the plan period</td> <td data-bbox="1126 568 1294 695">GCC Inform</td> <td data-bbox="1301 568 1444 695">Annually</td> </tr> <tr> <td data-bbox="582 700 855 796">Economically inactive persons aged 16-64</td> <td data-bbox="862 700 1120 796">Maintain levels close to the south west and national average</td> <td data-bbox="1126 700 1294 796">ONS</td> <td data-bbox="1301 700 1444 796">Annually</td> </tr> <tr> <td data-bbox="582 801 855 992">Net amount of employment floorspace created by use class (employment-generating uses)</td> <td data-bbox="862 801 1120 992"><del>34-60ha</del> <b>192ha</b> of employment <i>land</i> floorspace created <b>delivered</b> over the plan period.</td> <td data-bbox="1126 801 1294 992">Annual Employment Monitoring</td> <td data-bbox="1301 801 1444 992">Annually</td> </tr> <tr> <td data-bbox="582 997 855 1157">Amount of employment land lost to other non-employment-generating uses</td> <td data-bbox="862 997 1120 1157">No target but annually assessed</td> <td data-bbox="1126 997 1294 1157">Annual Employment Monitoring</td> <td data-bbox="1301 997 1444 1157">Annually</td> </tr> <tr> <td data-bbox="582 1161 855 1257">Gross weekly earnings of full- time workers.</td> <td data-bbox="862 1161 1120 1257">Maintain levels close to the south west and national average</td> <td data-bbox="1126 1161 1294 1257">ONS/NOMIS</td> <td data-bbox="1301 1161 1444 1257">Annually</td> </tr> <tr> <td data-bbox="582 1262 855 1378">Percentage of residents with NVQ Level 4 qualification and above</td> <td data-bbox="862 1262 1120 1378">Maintain levels close to the south west and national average</td> <td data-bbox="1126 1262 1294 1378">ONS</td> <td data-bbox="1301 1262 1444 1378">Annually</td> </tr> </tbody> </table>	<b>Building a strong and competitive urban economy</b>				Indicator	Target	Source	Period	Net additional jFobs created by sector (employment generating uses)	A minimum of <del>28,000</del> <b>39,500</b> jobs created over the plan period	GCC Inform	Annually	Economically inactive persons aged 16-64	Maintain levels close to the south west and national average	ONS	Annually	Net amount of employment floorspace created by use class (employment-generating uses)	<del>34-60ha</del> <b>192ha</b> of employment <i>land</i> floorspace created <b>delivered</b> over the plan period.	Annual Employment Monitoring	Annually	Amount of employment land lost to other non-employment-generating uses	No target but annually assessed	Annual Employment Monitoring	Annually	Gross weekly earnings of full- time workers.	Maintain levels close to the south west and national average	ONS/NOMIS	Annually	Percentage of residents with NVQ Level 4 qualification and above	Maintain levels close to the south west and national average	ONS	Annually	<p>indicators that are considered more appropriate for monitoring district level plans</p>
<b>Building a strong and competitive urban economy</b>																																			
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### JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes					Reason	
		Net new business start-ups	To increase business start-ups in the JCS area, improving on the rate of start-ups per 10,000 working age people against other English districts	GCC Inform	Annually			
PMM0130	Monitoring Framework	<b>Meeting the challenges of climate change</b>						Section updated to reflect the JCS Modifications and the removal of those indicators that are considered more appropriate for monitoring district level plans
		<b>Indicator</b>	<b>Target</b>	<b>Source</b>	<b>Period</b>			
		Per capita reduction in CO <sub>2</sub> emissions by local authority area	60% reduction in CO <sub>2</sub> emissions across Gloucestershire by 2020/21 from the 2005 baseline year	Greenhouse Gas Report/ <del>LTP3 Annual Progress Report</del>	Annually			
		New developments incorporating Sustainable Drainage Systems (SuDS) development	No target but monitoring progress	Internal monitoring (SA indicator)	Annually			
		Installed Renewable Capacity for Gloucestershire	No target but monitoring progress	RegenSW Renewable Energy Progress Report – Annual Survey (SA indicator)	Annually			
<del>10% of energy demand from major sites delivered from</del>	<del>All developments over 10 residential units or non-</del>	<del>Internal monitoring</del>	<del>Annually</del>					

### JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes				Reason
		decentralised, renewable or low carbon sources	residential development over 1000m <sup>2</sup>			
		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	
PMM0131	Monitoring Framework	<del>Meeting the challenges of climate change</del> <b>Promoting Sustainable Transport</b>				Section updated to reflect the JCS Modifications and the removal of those indicators that are considered more appropriate for monitoring district level plans
		<b>Indicator</b>	<b>Target</b>	<b>Source</b>	<b>Period</b>	
		Local bus passenger journeys <i>Increase use of bus</i>	Maintain and increase journeys from a base year of 2011/12 (21,361) <i>Increase number of bus passenger journeys</i>	LTP3 Annual Progress Report.	Annually	
		Annualised index of cycling trips <i>Increase use of cycling</i>	No target but monitoring progress <i>Increase the number of cycle users at sites across the county</i>	LTP3 Annual Progress Report.	Annually	
		<i>Increase use of rail</i>	<i>Increase the number of rail ticket sales from railway stations</i>	LTP3 Annual Progress Report.	Annually	
Average journey time per mile during morning peak Journey	Maintain and improve journey time	LTP3 Annual Progress Report.	Annually			

### JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes				Reason								
		<p><i>time reliability on primary strategic routes</i></p> <p><del>Morning peak period traffic – number of vehicles travelling towards urban centres</del></p> <p><b>Number of peak hour vehicle journeys</b></p>	<p><b>Maintain average journey times at 2015/16 levels</b></p> <p><del>Traffic to remain at current levels compared with 2077-2010 average AM peak period traffic:</del></p> <p>Gloucester 5539 vehicles            Cheltenham 12936 vehicles <b>Restrict growth in the number of peak hour vehicle journeys on local access routes</b></p>	<p><del>LTP3 Annual Progress Report.</del></p>	<p>Annually</p>									
		<p>Levels of self containment</p>	<p>Continue to improve on 2011 levels:</p> <p>Gloucester 66%            Cheltenham 77%            Tewkesbury 39%</p>	<p>Census returns</p>	<p>10-year census</p>									
PMM0132	Monitoring Framework	<p><b>Delivering a wide choice of quality homes</b></p> <table border="1"> <thead> <tr> <th>Indicator</th> <th>Target</th> <th>Source</th> <th>Period</th> </tr> </thead> <tbody> <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> </tbody> </table>				Indicator	Target	Source	Period	Net dwelling completions, based on the set housing requirements and 5-year housing supply	To deliver against the established objectively assessed need over the plan period.	Annual Housing Monitoring	Annually	<p>Section updated to reflect the JCS Modifications and the removal of those indicators that are considered more appropriate for monitoring district level plans</p>
Indicator	Target	Source	Period											
Net dwelling completions, based on the set housing requirements and 5-year housing supply	To deliver against the established objectively assessed need over the plan period.	Annual Housing Monitoring	Annually											

### JCS Table of Main Modifications

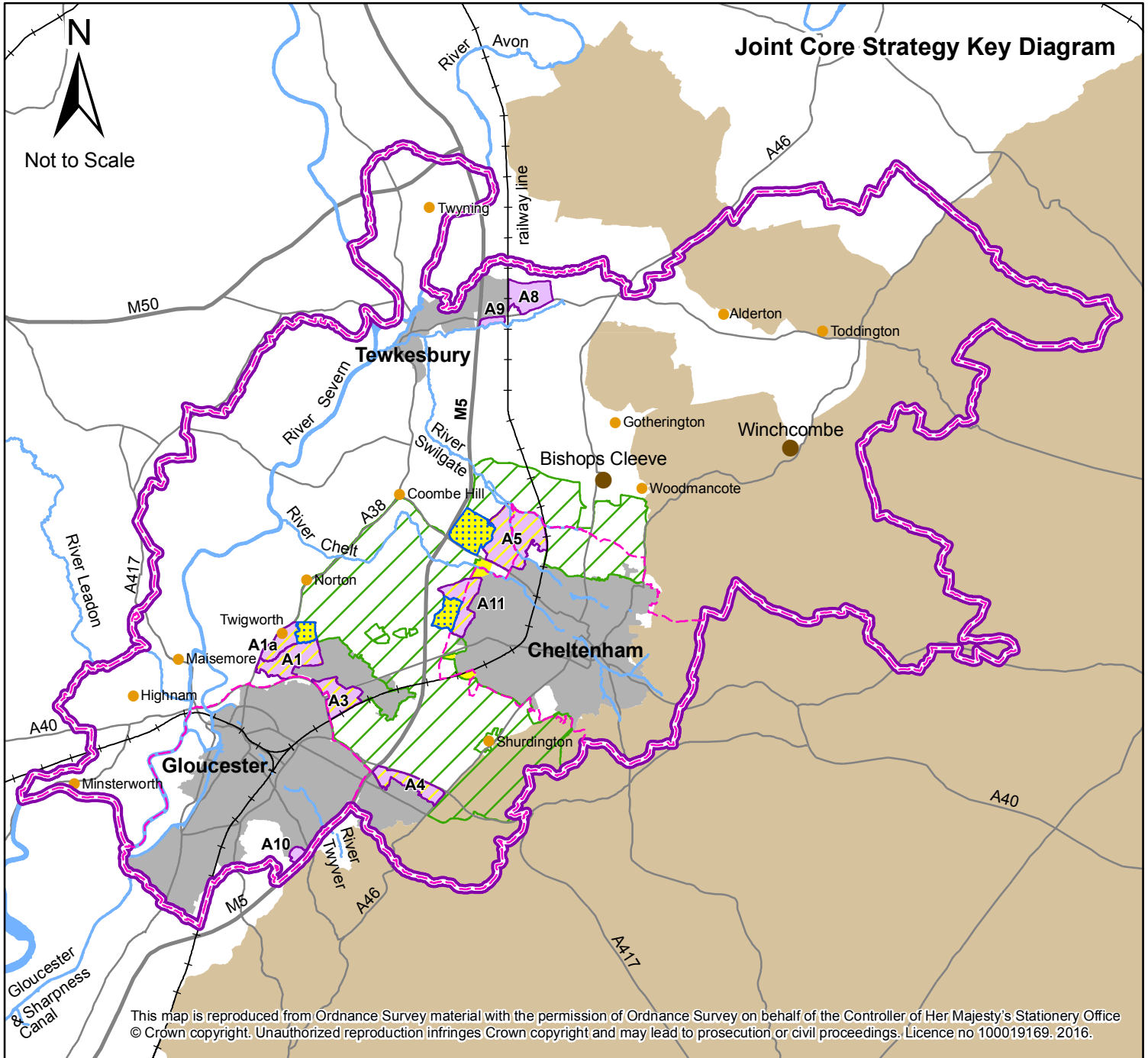
Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes				Reason
		Net completions of Gypsy, Traveller and Travelling Showpeople accommodation against requirements, based on the set target	To deliver against the established objectively assessed need over the plan period.	Annual Housing Monitoring	Annually	
		Net affordable housing completions against annual requirements	To deliver against the established objectively assessed need over the plan period.	Internal monitoring	Annually	
		<i>Cumulative housing completions on JCS Strategic Allocations.</i>	<i>Minimum 75% of the annual cumulative requirement of the three districts.</i>	<i>Internal monitoring</i>	<i>Annually</i>	
PMM0133	Monitoring Framework	<b>Promoting healthy communities</b>				Section updated to reflect the JCS Modifications and the removal of those indicators that are considered more appropriate for monitoring district level plans
		<b>Indicator</b>	<b>Target</b>	<b>Source</b>	<b>Period</b>	
		Number of Air Quality Management Areas	Reduce the number of Air Quality Management Areas.	LTP3 Annual Progress Report	Annually	
		Access to services and facilities by public transport, walking and cycling <i>Maintain bus passenger access to facilities</i>	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 <i>Maintain level of access to GP services and facilities by public</i>	LTP3 Annual Progress Report	Annually	

### JCS Table of Main Modifications

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes				Reason
			<i>transport within 45 minutes</i>			
		Amount of public open space provided in new developments	All schemes to meet policy standards for the provision of public open space	Internal monitoring	Annually	
		Number of Lower Super Output Areas in the 20% most deprived in England and Gloucestershire	To reduce the number of Lower Super Output Areas amongst the 20% most deprived in Gloucestershire and England	South West Observatory, Indices of Deprivation	Annually	
		Number of essential community facilities lost or gained through the development process	No loss of community facilities	Internal monitoring	Annually	
		Provision of sporting facilities	Increase sports facilities in the JCS area as a percentage of regional provision: JCS area—6% in January 2013	Sport England Local Sport Profiles	Annually	

**JCS Table of Main Modifications**

Proposed Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes					Reason
		<p>Access to green space  <del>—% of dwellings having access to:</del></p> <ul style="list-style-type: none"> <li><del>— well maintained, high-quality and versatile green space within 300 metres</del></li> <li><del>— 20ha green space site within 2km</del></li> <li><del>— 100ha green space site within 5km</del></li> <li><del>— 500ha green space site within 10km</del></li> </ul>	<p>Maintain and improve the % of dwellings with sufficient access to green space</p>	<p>Internal monitoring</p>	<p>Annually</p>		
PMM0134	MAPS	<i>SEE SEPARATE APPENDICES</i>					Updated

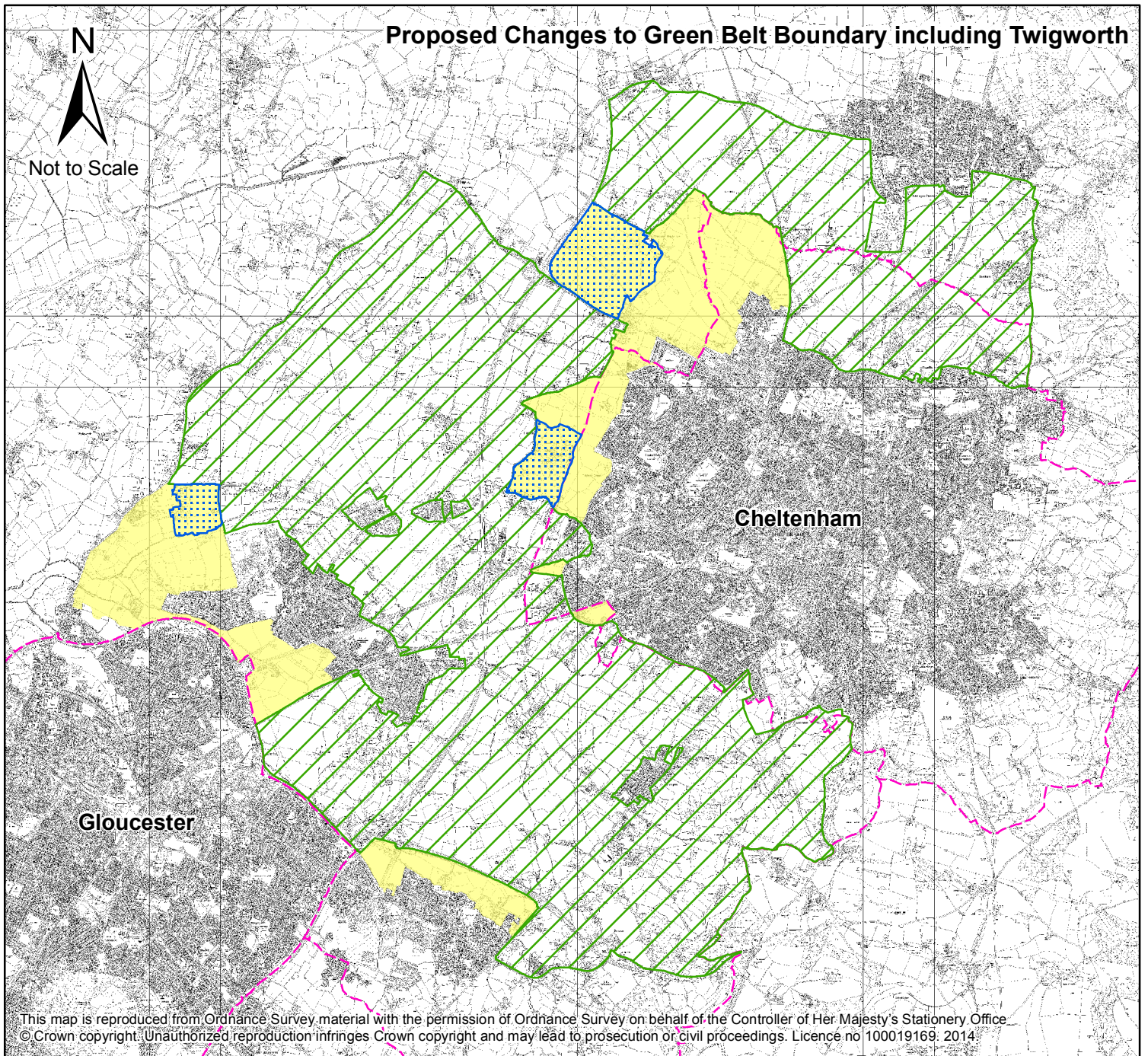


**Key**






-  Joint Core Strategy Area
-  Administrative Boundaries
-  City and Town Areas
-  Strategic Allocations
-  Safeguarded Area
-  Rural Service Centres
-  Service Villages
-  The Cotswolds Area of Outstanding Natural Beauty
-  Areas to be removed from Green Belt
-  Green Belt (revised)

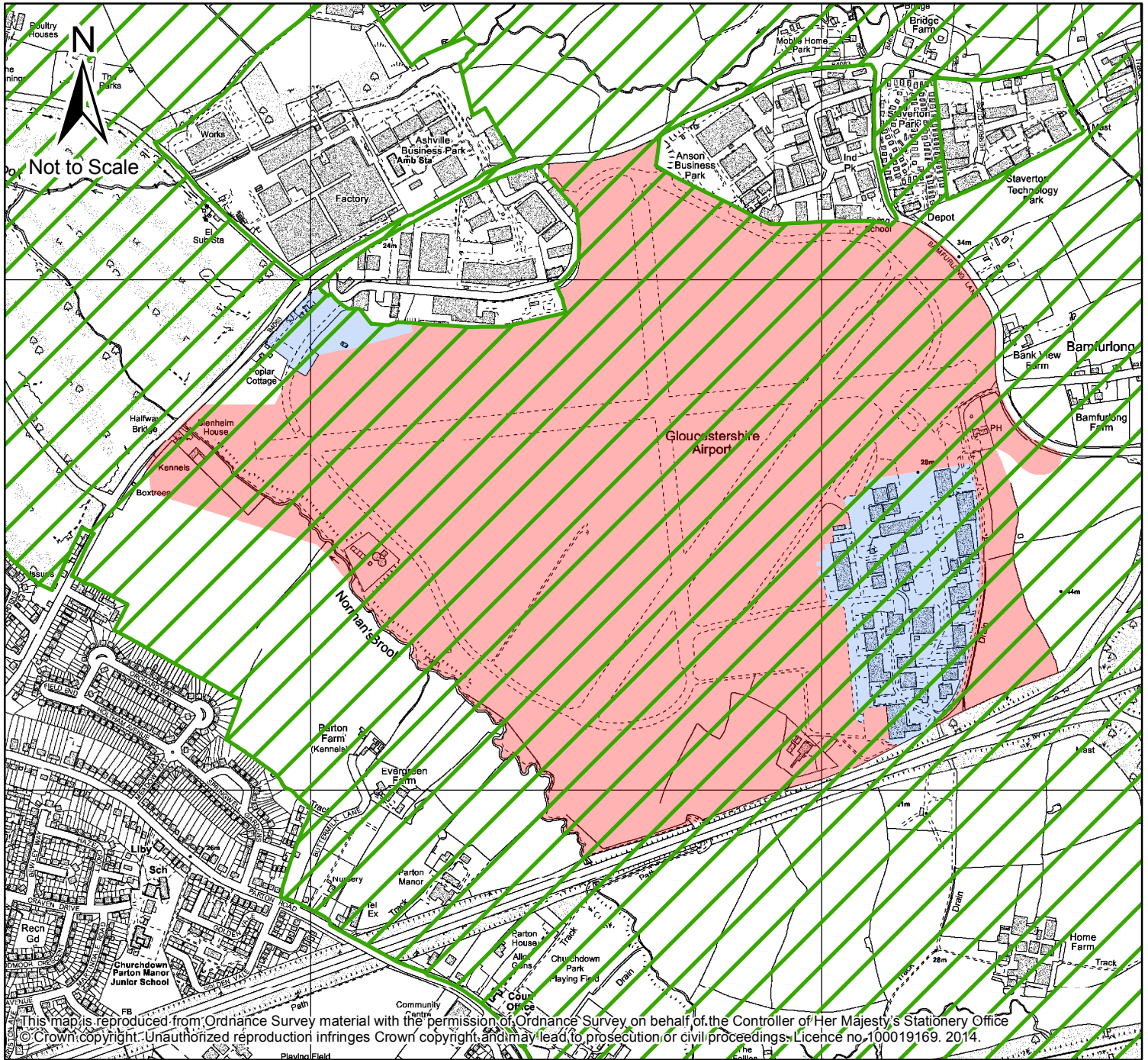


## Appendix 2






### Key

-  Existing Green Belt Boundary
-  Green Belt (revised)
-  Areas to be removed from Green Belt
-  Safeguarded Area
-  Administrative Boundaries





**Key**

-  Existing Green Belt Boundary
-  Essential Operational Area of Airport
-  Non Essential Operational Area of Airport



**Key**

-  Existing Green Belt Boundary
-  Racecourse Policy Area

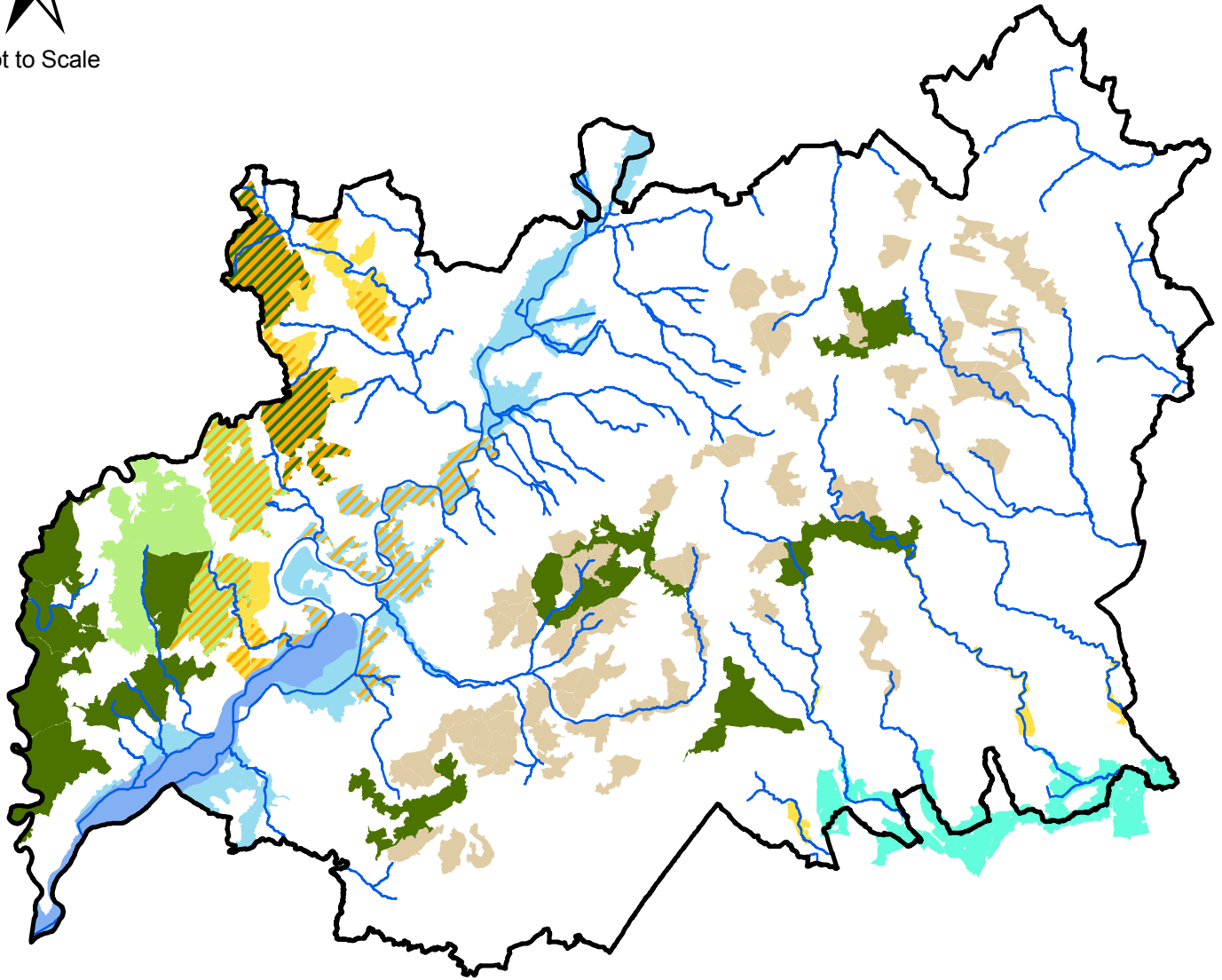
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Not to Scale














# Gloucestershire Nature Map

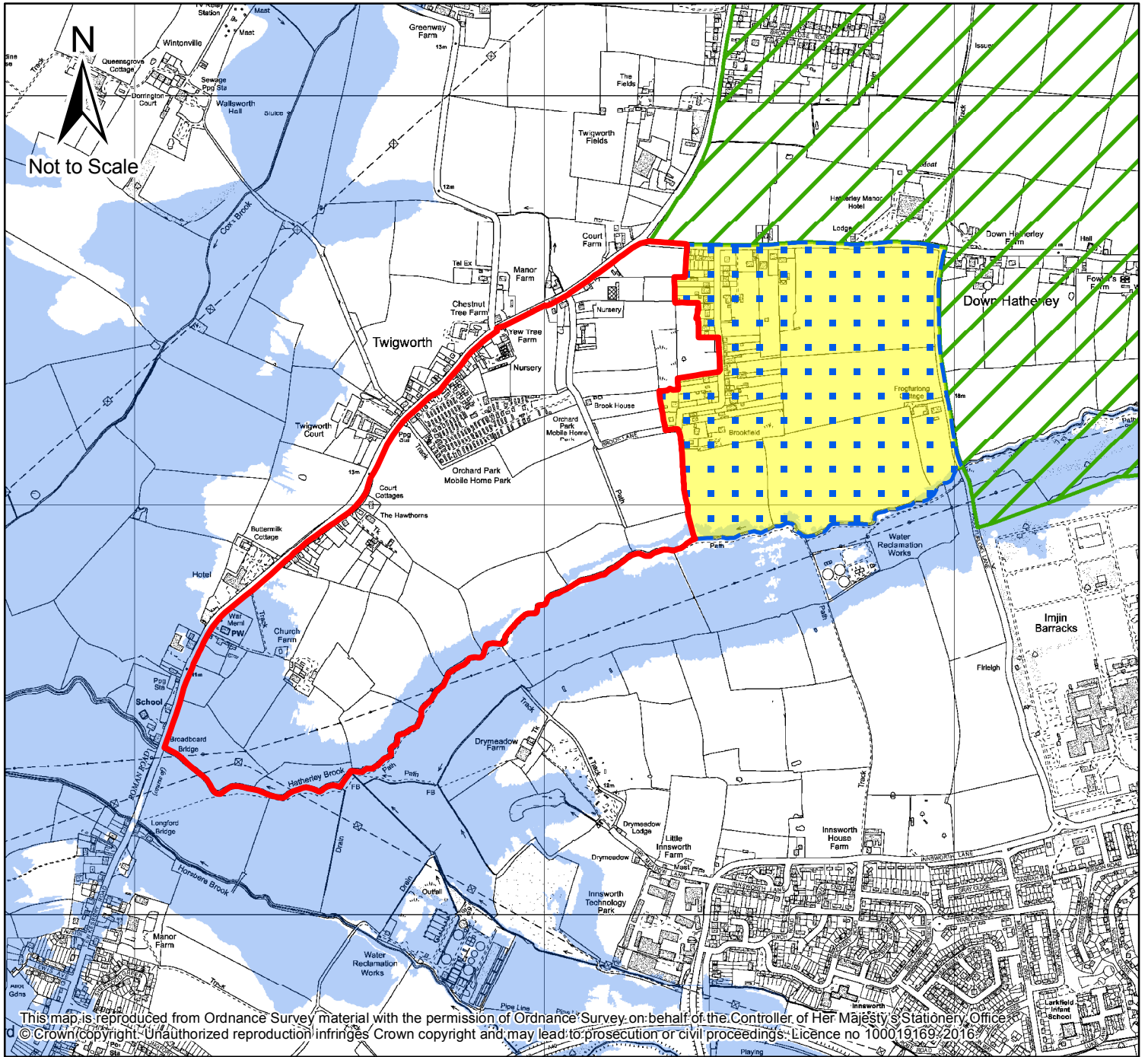
## Strategic Nature Areas



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


### Key

-  Coastal and Floodplain Grazing Marsh
-  Lowland Calcareous (Limestone) Grassland
-  Lowland Meadows
-  Lowland Meadows (incl. Traditional Orchards)
-  Wet Grassland (as part of Coastal & Floodplain Grazing Marsh incl. Traditional Orchards)
-  Wet Grassland (as part of Coastal & Floodplain Grazing Marsh)
-  Woodland Mosaic
-  Woodland Mosaic (incl. Heathland and Acid Grassland)
-  Woodland Mosaic (incl. Heathland, Acid Grassland & Traditional Orchards)
-  Woodland Mosaic (incl. Traditional Orchards)
-  Gloucestershire County Boundary
-  Rivers
-  Severn Estuary

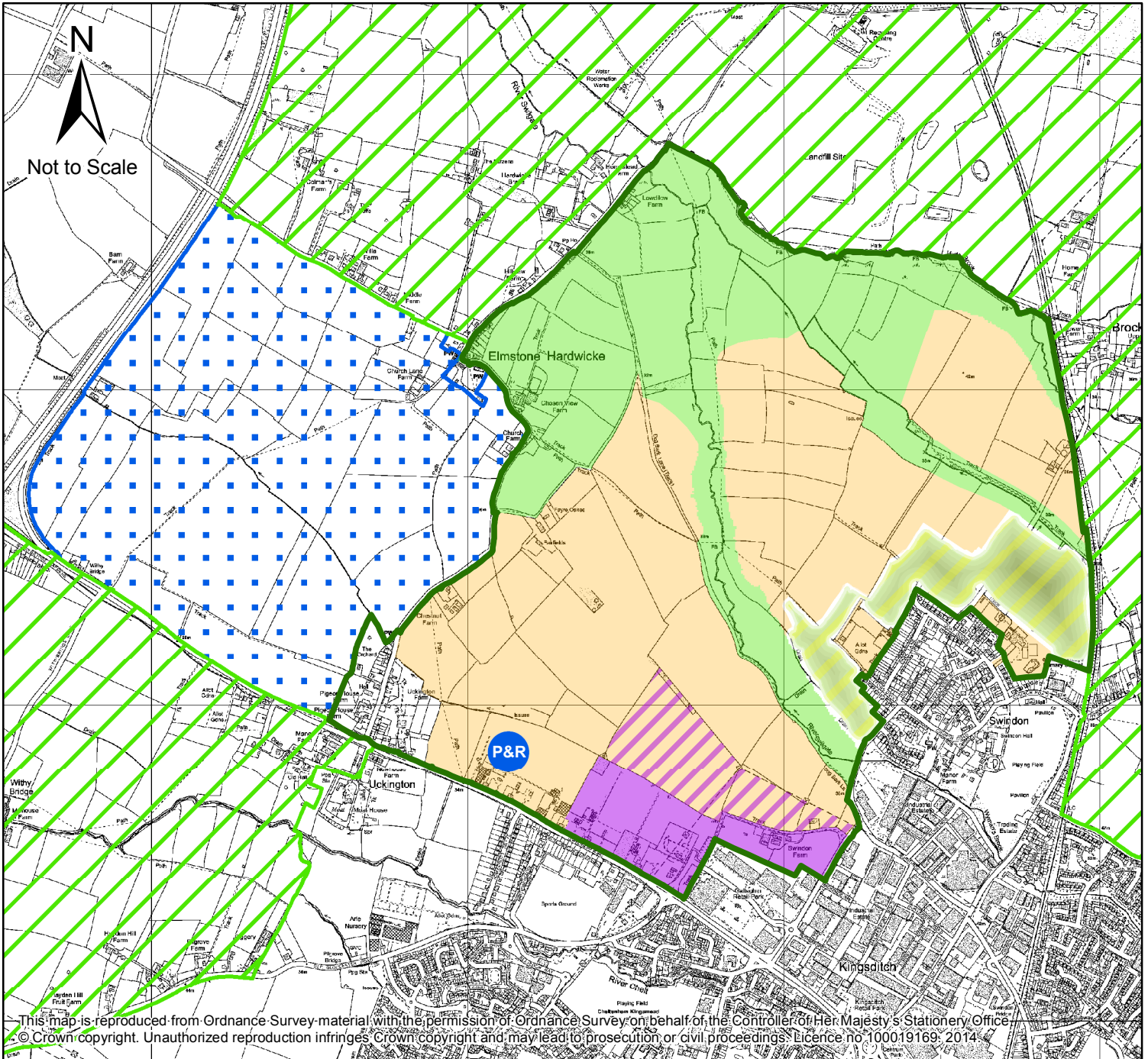


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**Key**

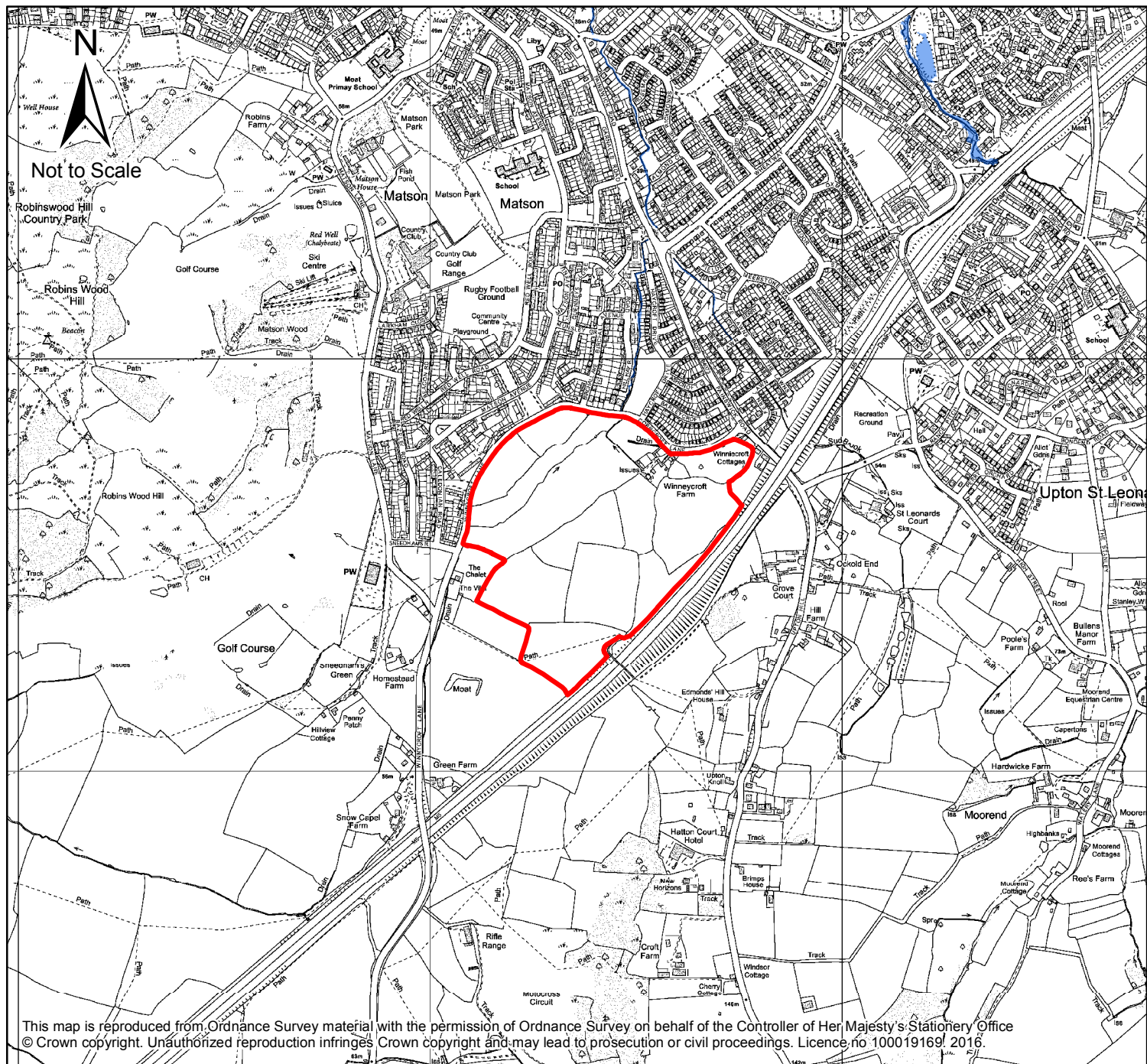
-  Allocated Site Boundary
-  Safeguarded Area
-  Green Belt (revised)
-  Floodzone 3

# Indicative Site Layout 5 - North West Cheltenham Urban Extension



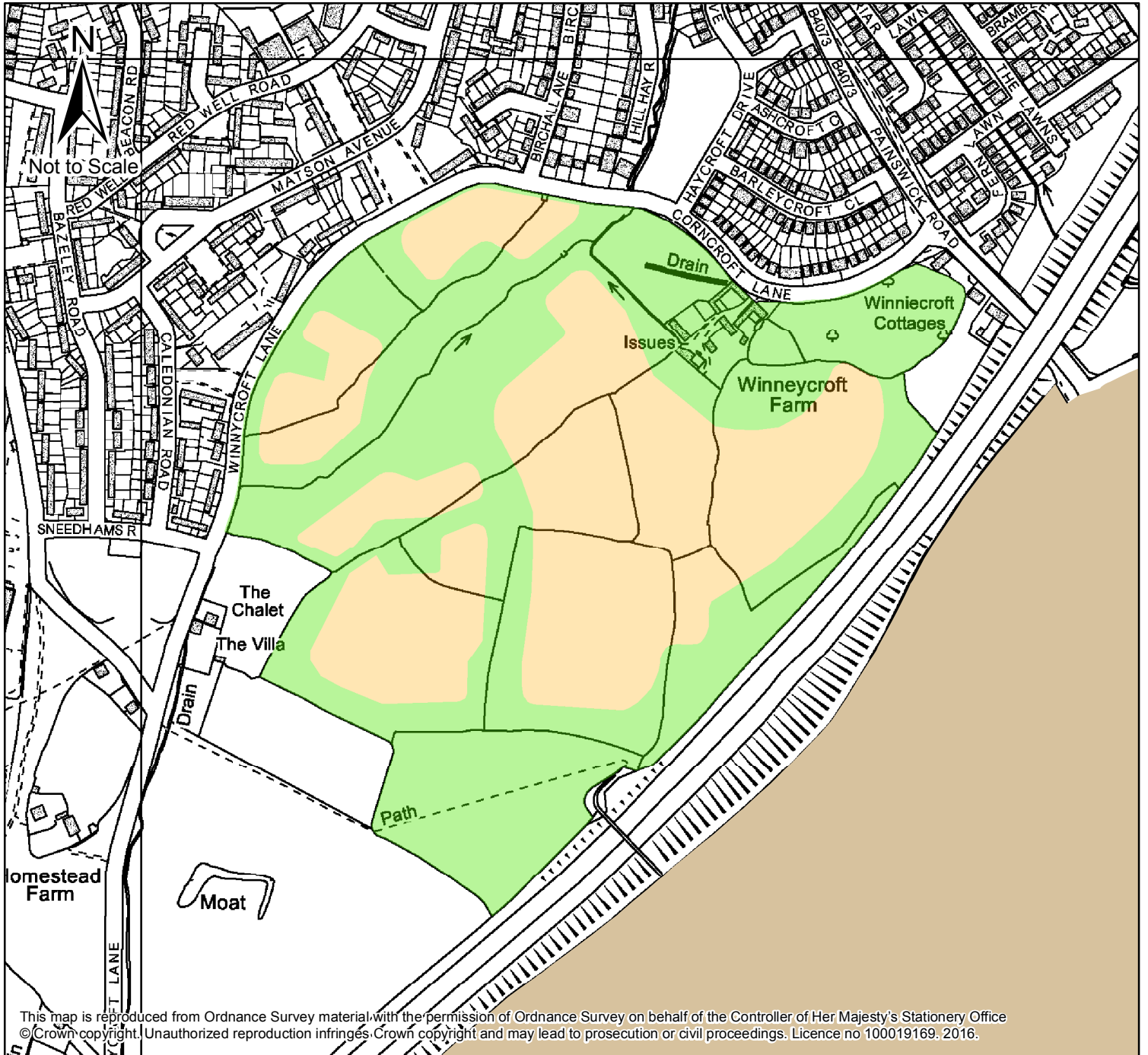
## Key

-  Housing and related infrastructure
-  Employment and related infrastructure
-  Housing and Employment and related infrastructure
-  Green Infrastructure and other supporting infrastructure
-  Swindon Village Green Buffer/ Indicative Local Green Space area for allocation in the Cheltenham Plan
-  Areas removed from Green Belt
-  Green Belt (revised)
-  Safeguarded Area
-  Proposed Park & Ride



**Key**

- Allocated Site Boundary
- Floodzone 3

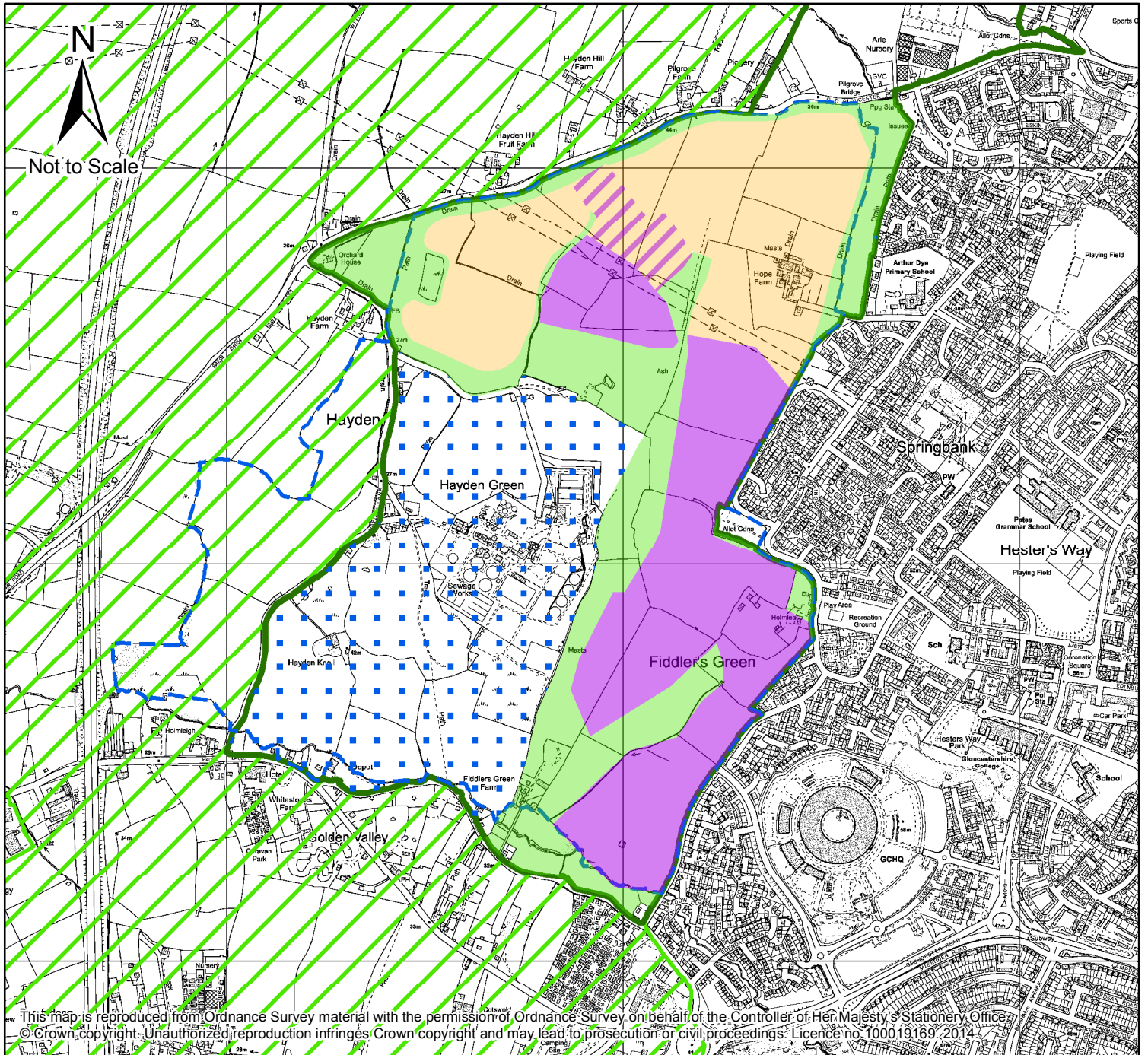


**Key**

- Housing and related infrastructure
- Green Infrastructure and other supporting infrastructure
- The Cotswolds Area of Outstanding Natural Beauty











# Indicative Site Layout 11 - West Cheltenham

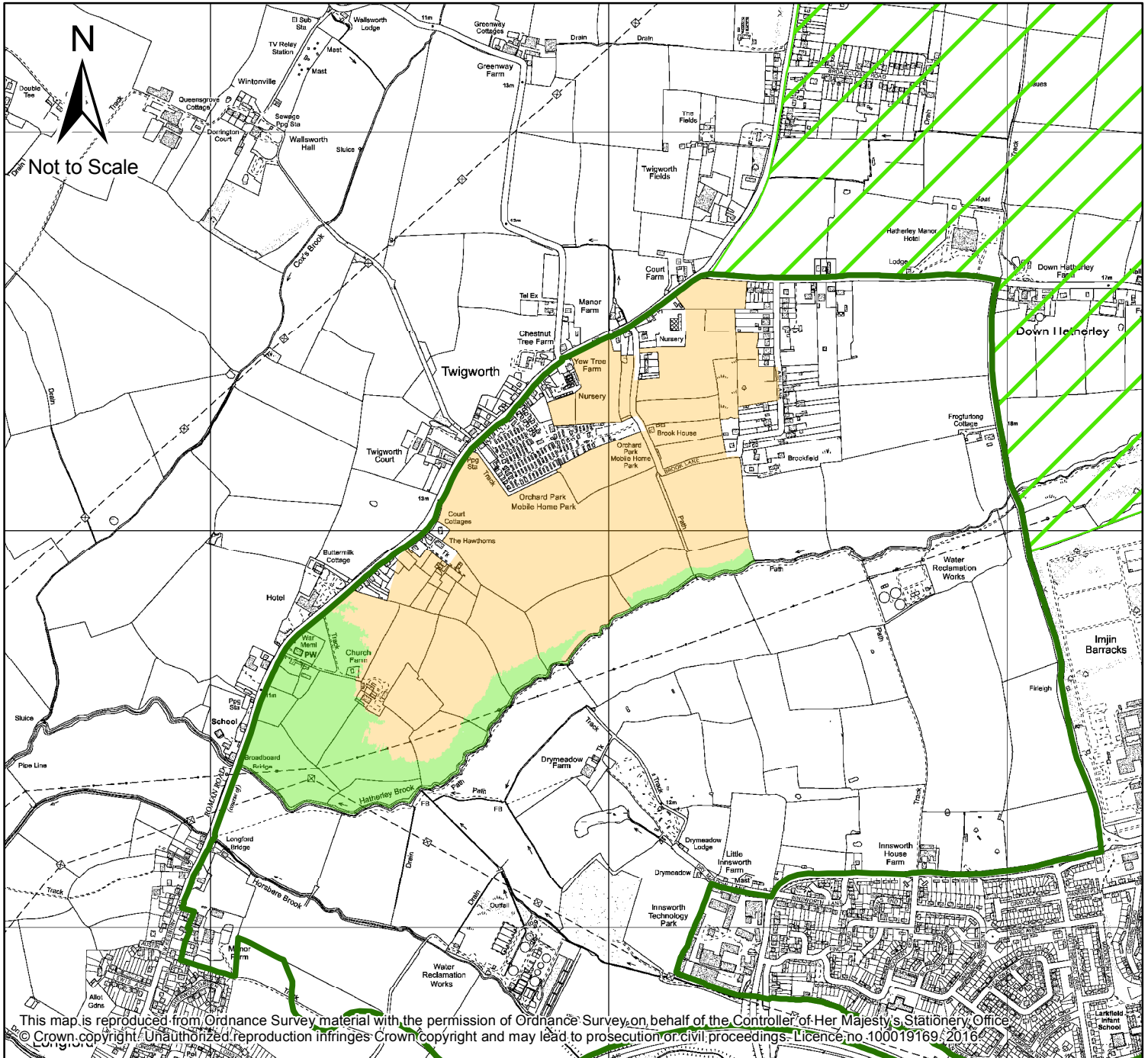


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## Key

-  Housing and related infrastructure
-  Employment and related infrastructure
-  Housing and Employment and related infrastructure
-  Green Infrastructure and other supporting infrastructure
-  Areas removed from Green Belt
-  Green Belt (revised)
-  Safeguarded Area
-  Odour Monitoring Zone

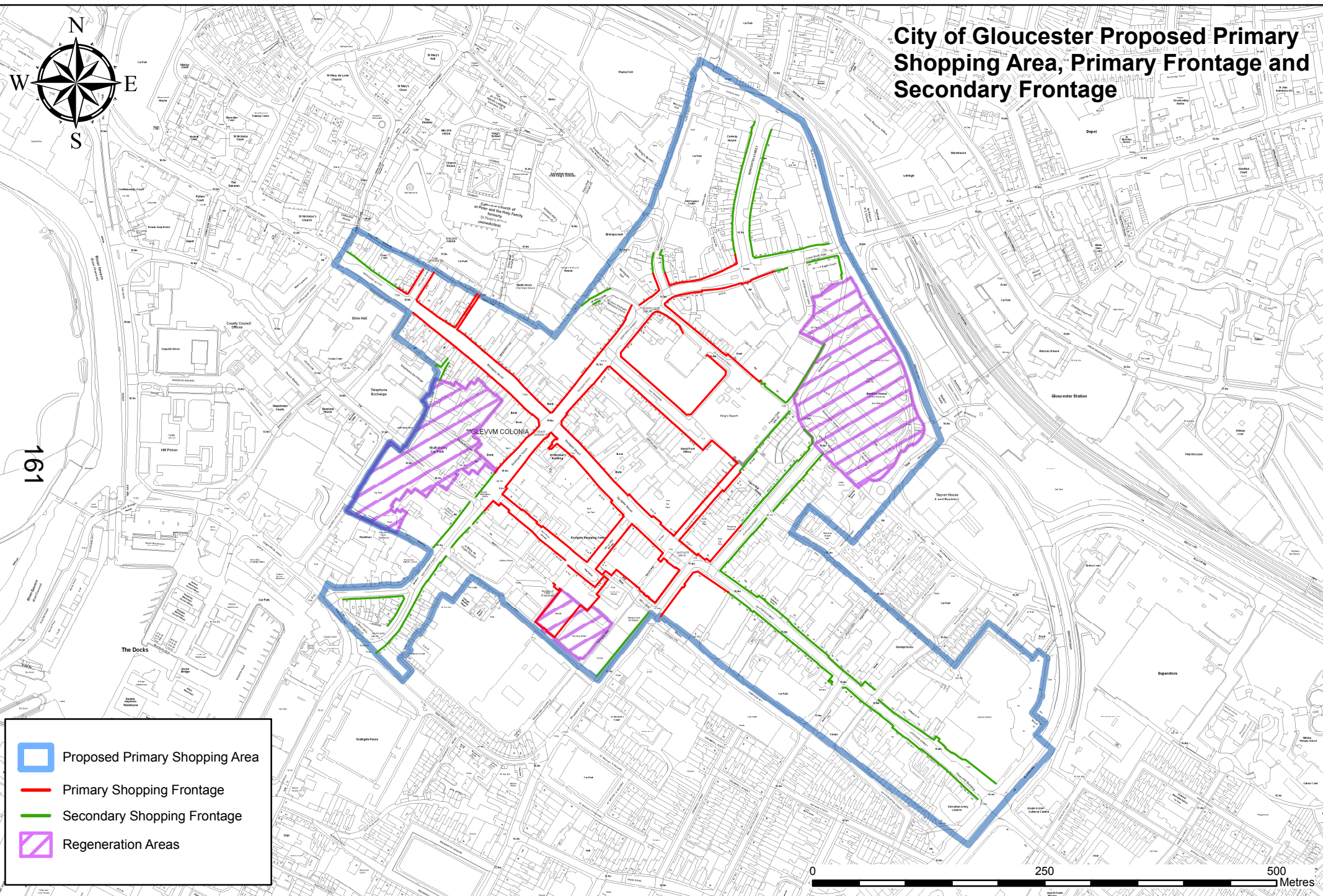
# Indicative Site Layout A1a - Twigworth Urban Extension




## Key

- Housing and related infrastructure
- Green Infrastructure and other supporting infrastructure
- Areas removed from Green Belt
- Green Belt (revised)

# City of Gloucester Proposed Primary Shopping Area, Primary Frontage and Secondary Frontage



-  Proposed Primary Shopping Area
-  Primary Shopping Frontage
-  Secondary Shopping Frontage
-  Regeneration Areas

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## **Superseded development plan policies and proposals**

The list below shows which policies, supporting paragraphs and proposals of the adopted **Cheltenham Borough Local Plan 2006**, which were saved by a Direction from the Secretary of State in 2009, will be replaced upon adoption of the JCS (in accordance with Regulation 8(5) of the Town and Country Planning (Local Planning) (England) Regulations 2012).

### **Explanatory note:**

Where a JCS policy or policies is listed in the “**JCS Policies to supersede Local Plan Policy**” box these policies will directly replace the relevant 2006 Cheltenham Local Plan Policy on adoption of the JCS.

Where the text reads “Local Plan Policy to be saved beyond the adoption of the JCS” These policies are to remain saved and in use after the JCS is adopted; we seek to replace these in time through the forthcoming ‘district plan’ the Cheltenham Local Plan.

Where the text reads “deleted” these policies are to be deleted on adoption of the JCS as they have been replaced by national policy or have otherwise ceased to be useful.

<b>CBC LP policy ref</b>	<b>Policy heading</b>	<b>JCS Policies to supersede Local Plan Policy</b>
CP 1	Sustainable Development	SD11, SD15
CP 2	Sequential Approach to Location of Development	Local Plan Policy to be saved beyond the adoption of the JCS
CP 3	Sustainable Environment	Local Plan Policy to be saved beyond the adoption of the JCS
CP 4	Safe and Sustainable Living	Local Plan Policy to be saved beyond the adoption of the JCS
CP 5	Sustainable Transport	SD5, INF1
CP 6	Mixed Use Development	Local Plan Policy to be saved beyond the adoption of the JCS
CP 7	Design	Local Plan Policy to be saved beyond the adoption of the JCS
CP 8	Provision of Necessary Infrastructure and Facilities	INF5, INF7, INF8
PR 1	Land Allocated for Housing Development	Local Plan Policy to be saved beyond the adoption of the JCS
PR 2	Land Allocated for Mixed Use Development	Local Plan Policy to be saved beyond the adoption of the JCS
PR 3	Land Safeguarded for Transport Schemes	Deleted
BE 1	Open Space in Conservation Areas	Local Plan Policy to be saved beyond the adoption of the JCS
BE 2	Residential Character in Conservation Areas	Local Plan Policy to be saved beyond the adoption of the JCS
BE 3	Demolition in Conservation Areas	Deleted
BE 4	Timing Of Demolition in Conservation Areas	Local Plan Policy to be saved beyond the adoption of the JCS
BE 5	Boundary Enclosures in Conservation Areas	Local Plan Policy to be saved beyond the adoption of the JCS
BE 6	Back Lanes in Conservation Areas	Local Plan Policy to be saved beyond the adoption of the JCS
BE 7	Parking on Forecourts or Front Gardens in Conservation Areas	Local Plan Policy to be saved beyond the adoption of the JCS
BE 8	Demolition of Listed Buildings	Deleted
BE 9	Alteration of Listed Buildings	Deleted
BE 10	Boundary Enclosures to Listed Buildings	Local Plan Policy to be saved beyond the adoption of the JCS
BE 11	Buildings of Local Importance	Local Plan Policy to be saved beyond the adoption of the JCS
BE 12	Advertisements and Signs	Deleted
BE 13	Advertisements and Signs in Conservation Areas	Local Plan Policy to be saved beyond the adoption of the JCS
BE 14	Advertisement Hoardings in Conservation Areas	Local Plan Policy to be saved beyond the adoption of the JCS
BE 15	Projecting Signs in Conservation Areas	Local Plan Policy to be saved beyond the adoption of the JCS
BE 16	Petrol Filling Stations and Car Sales in Conservation Areas	Local Plan Policy to be saved beyond the adoption of the JCS
BE 17	Advertisements And Signs On Listed Buildings	Local Plan Policy to be saved beyond the adoption of the JCS
BE 18	Design and Landscaping of New Roads	SD5
BE 19	Nationally Important Archaeological Remains	Local Plan Policy to be saved beyond the adoption of the JCS
BE 20	Archaeological Remains of Local Importance	Local Plan Policy to be saved beyond the adoption of the JCS
GE 1	Public Green Space	Local Plan Policy to be saved beyond the adoption of the JCS

GE 2	Private Green Space	Local Plan Policy to be saved beyond the adoption of the JCS
GE 3	Development Within Extensive Grounds	SD5, SD10, INF4
GE 4	Pittville Park and Bouncers Lane Cemetery	Local Plan Policy to be saved beyond the adoption of the JCS
GE 5	Protection and Replacement of Trees	Local Plan Policy to be saved beyond the adoption of the JCS
GE 6	Trees And Development	Local Plan Policy to be saved beyond the adoption of the JCS
GE 7	Accommodation and Protection of Natural Features	Local Plan Policy to be saved beyond the adoption of the JCS
CO 1	Landscape Character	SD5, SD7, SD8
CO 2	Development within or affecting the AONB	SD8
CO 3	Rebuilding or Replacement of Buildings in the AONB	SD8
CO 4	Extension of Buildings in the AONB	Local Plan Policy to be saved beyond the adoption of the JCS
CO 5	Definition of Green Belt	SD6
CO 6	Development in the Green Belt	SD6, SD11
CO 7	Rebuilding or Replacement of Dwellings in the Green Belt	Local Plan Policy to be saved beyond the adoption of the JCS
CO 8	Extension of Dwellings in the Green Belt	Deleted
CO 9	Development at Cheltenham Racecourse	SD6
CO 10	Agricultural Land	SD15
CO 11	Agricultural and Forestry Dwellings	Local Plan Policy to be saved beyond the adoption of the JCS
CO 12	Farm Diversification Projects	SD2, SD5, SD7,
CO 13	Conversion of Rural Buildings	Local Plan Policy to be saved beyond the adoption of the JCS
CO 14	Development Abutting the Countryside	SD5, SD7
NE 1	Habitats of Legally Protected Species	SD10
NE 2	Designated Nature Conservation Sites	SD10
NE 3	Biodiversity and Geodiversity of Local Importance	SD10
NE 4	Contaminated Land	SD15
EM 1	Employment Uses	SD2
EM 2	Safeguarding of Employment Land	Local Plan Policy to be saved beyond the adoption of the JCS
HS 1	Housing Development	SD11
HS 2	Housing Density	SD11
HS 3	Sub-Division of Existing Dwellings	SD5
HS 4	Affordable Housing	SD13
HS 5	Mixed Communities	SD12
HS 6	Elderly Persons Housing	SD12
HS 7	Loss of Residential Accommodation	Deleted
HS 8	Houses in Multiple Occupation	Deleted
RT 1	Location of Retail Development	Local Plan Policy to be saved beyond the adoption of the JCS
RT 2	Retail Development in the Core Commercial Area	Local Plan Policy to be saved beyond the adoption of the JCS
RT 3	Non-A1 Uses in Primary Shopping Frontages	Local Plan Policy to be saved beyond the adoption of the JCS
RT 4	Retail Development in Local Shopping Centres	Local Plan Policy to be saved beyond the adoption of the JCS
RT 5	Non A1 Uses In Local Shopping Centres	Local Plan Policy to be saved beyond the adoption of the JCS
RT 6	New Local Shopping Centres	Deleted

RT 7	Retail Development in Out of Centre Locations	Deleted
RT 8	Individual Convenience Shops	Local Plan Policy to be saved beyond the adoption of the JCS
RT 9	Car Sales	Local Plan Policy to be saved beyond the adoption of the JCS
RT 10	Access to Upper Floors of Commercial Premises	Local Plan Policy to be saved beyond the adoption of the JCS
RC 1	Existing Community Facilities	INF5
RC 2	Youth and Adult Outdoor Playing Facilities	Local Plan Policy to be saved beyond the adoption of the JCS
RC 3	Outdoor Playing Facilities in Educational Use	INF5
RC 4	Casual Play Space	Local Plan Policy to be saved beyond the adoption of the JCS
RC 5	Development of Amenity Space	Local Plan Policy to be saved beyond the adoption of the JCS
RC 6	Play Space in Residential Development	Local Plan Policy to be saved beyond the adoption of the JCS
RC 7	Amenity Space in Housing Developments	Local Plan Policy to be saved beyond the adoption of the JCS
RC 8	New Public Green Space	Local Plan Policy to be saved beyond the adoption of the JCS
RC 9	Honeybourne Line Footpath/Cycleway	Local Plan Policy to be saved beyond the adoption of the JCS
RC 10	Allotments	Local Plan Policy to be saved beyond the adoption of the JCS
RC 11	Recreation and Sport in the Countryside	SD6, SD7, SD8
RC 12	Golf Courses	SD6, SD7, SD8
RC 13	Public Rights of Way in the Countryside	INF4
UI 1	Development in Flood Zones	INF3
UI 2	Development and Flooding	INF3
UI 3	Sustainable Drainage Systems	INF3
UI 4	Maintenance Strips for Watercourses	Local Plan Policy to be saved beyond the adoption of the JCS
UI 5	Culverting of Watercourses	INF3
UI 6	Development Near Sewage Treatment Works	SD6
UI 7	Renewable Energy	SD4, SD5, SD15, INF6
UI 8	Telecommunications Installations	INF7, SD15
TP 1	Development and Highway Safety	SD5, INF1, INF2
TP 2	Highway Standards	SD5, INF1, INF2
TP 3	Servicing of Shopping Facilities	Deleted
TP 4	Long-Stay Car Parking	Local Plan Policy to be saved beyond the adoption of the JCS
TP 5	Extension of Private Car Parking Facilities	Deleted
TP 6	Parking Provision In Development	Deleted

**Superseded development plan policies and proposals  
Tewkesbury Borough Council**

The list below shows which policies, supporting paragraphs and proposals of the adopted **Tewkesbury Borough Local Plan 2006**, which were saved by a Direction from the Secretary of State in 2009, will be replaced upon adoption of the JCS (in accordance with Regulation 8(5) of the Town and Country Planning (Local Planning) (England) Regulations 2012).

<b>POLICY REF</b>	<b>TITLE</b>	<b>SUPERSEDED BY JCS? YES/NO</b>	<b>SUPERSEDING JCS POLICY /POLICIES</b>
GNL2	DESIGN REQUIREMENTS FOR MAJOR DEVELOPMENT PROPOSALS	YES	SD5
GNL6	PROVISION FOR ART.	NO	
GNL8	ENERGY EFFICIENT DEVELOPMENT	YES	SD4
GNL11	IMPLEMENTATION	YES	INF7 INF3
GNL13	ADVERTISEMENTS	NO	
GNL15	NEW COMMUNITY FACILITIES	YES	INF5
GNL17	PRE-SCHOOL CHILDCARE FACILITIES	NO	
HOU1	HOUSING ALLOCATIONS	NO	



HOU2	LARGER SETTLEMENTS CONTAINING A PRIMARY LEVEL OF COMMUNITY FACILITIES AND SERVICES	YES	SP2 SD11
HOU3	OTHER VILLAGES (INFILLING ONLY)	YES	SP2 SD11
HOU4	OTHER SETTLEMENTS/RURAL AREAS	YES	SP2 SD11
HOU5	NEW HOUSING DEVELOPMENT WITHIN EXISTING RESIDENTIAL AREAS	YES	SP2 SD11
HOU6	REFURBISHMENT OF EXISTING DWELLINGS	NO	
HOU7	REPLACEMENT DWELLINGS	NO	
HOU8	DOMESTIC EXTENSIONS	NO	
HOU9	CONVERSIONS / SUB-DIVISION	NO	
HOU10	CHANGE OF USE OF AGRICULTURAL LAND TO RESIDENTIAL CURTILAGE	NO	
HOU11	ELDERLY PERSONS' ACCOMMODATION (INDEPENDENT UNITS)/ SPECIAL NEEDS HOUSING	YES	SD 12
HOU12	MOBILE HOMES	NO	
HOU13	AFFORDABLE HOUSING	YES	SD13
HOU14	AFFORDABLE HOUSING (EXCEPTIONS SCHEMES)	YES	SD13
HOU16	MINSTERWORTH TRAVELLERS' SITES	NO	
GRB1	GREEN BELT	YES	SD6
EMP1	MAJOR EMPLOYMENT SITES	NO	
EMP2	EMPLOYMENT USES WITHIN SETTLEMENTS OUTSIDE ALLOCATED SITES	NO	
EMP3	RURAL BUSINESS CENTRES	NO	
EMP4	RURAL EMPLOYMENT POLICY	YES	SD2
EMP5	EXISTING EMPLOYMENT USES OUTSIDE SETTLEMENTS, ALLOCATED SITES AND RURAL BUSINESS CENTRES	YES	SD2
TPT1	ACCESS FOR DEVELOPMENT	YES	INF1
TPT3	PEDESTRIAN NETWORKS	NO	
TPT5	CYCLE NETWORK ENHANCEMENT	NO	
TPT6	CYCLE PARKING	NO	
TPT8	PARK AND RIDE PROVISION	NO	
TPT9	PUBLIC TRANSPORT CORRIDORS	NO	
TPT10	RAILWAY STATIONS	NO	
TPT11	SUPPORT FOR RESTORATION OF GLOUCESTERSHIRE WARWICKSHIRE RAILWAY	NO	
TPT13	M5 JUNCTION 9 TO A46 ASTON CROSS	NO	
TPT14	TEWKESBURY NORTHERN BYPASS CORRIDOR PROTECTION	NO	
TPT16	NEW PETROL FILLING STATIONS	NO	
TPT18	PROTECTION OF POTENTIAL FREIGHT RAILHEADS	YES	SA1
HEN2	CONSERVATION AREA: SETTING AND IMPACT	NO	

HEN6	SHOPFRONTS IN CONSERVATION AREAS	NO	
HEN7	BLINDS AND CANOPIES IN CONSERVATION AREAS	NO	
HEN17	ADVERTISEMENTS ON LISTED BUILDINGS	NO	
HEN24	HISTORIC BATTLEFIELDS	NO	
EVT1	ENERGY	YES	INF6
EVT2	LIGHT POLLUTION	YES	SD15
EVT3	NOISE POLLUTION	YES	SD15
EVT5	DEVELOPMENT IN HIGH, AND LOW TO MEDIUM FLOOD RISK AREAS	YES	INF3
EVT8	DEVELOPMENT NEAR SEWAGE TREATMENT WORKS	NO	
EVT9	SUSTAINABLE URBAN DRAINAGE SYSTEMS	YES	INF3
LND2	SPECIAL LANDSCAPE AREA (SLA)	NO	
LND3	LANDSCAPE PROTECTION ZONE (LPZ)	NO	
LND4	LANDSCAPE - COUNTRYSIDE PROTECTION	YES	SD7
LND5	IMPORTANT OPEN SPACES	NO	
LND6	HISTORIC PARKS AND GARDENS	NO	
LND7	LANDSCAPING OF NEW DEVELOPMENTS	YES	INF4 SD7 SD5
TOR1	GENERAL POLICY	NO	
TOR2	SERVICED / SELF CATERING ACCOMMODATION	NO	
TOR4	NEW STATIC CARAVAN / LOG CABIN / CHALET SITES	NO	
TOR5	TOURING CARAVAN AND CAMPING SITES	NO	
TOR6	EXTENSIONS TO EXISTING CARAVAN / CAMP SITES	NO	
TOR7	FARM DIVERSIFICATION	YES	SD2
TOR9	HEREFORDSHIRE AND GLOUCESTERSHIRE CANAL	NO	
RET1	TEWKESBURY TOWN CENTRE PRIMARY SHOPPING FRONTAGES	NO	
RET2	TEWKESBURY TOWN CENTRE MIXED USE FRONTAGES	NO	
RET3	RETAIL AREAS	NO	
RET4	NEW LOCAL FACILITIES	NO	
RET5	VILLAGE SHOPS AND PUBLIC HOUSES	NO	
RET6	NEW RETAIL PROPOSALS	YES	SD3
RET8	GARDEN CENTRES	NO	
RET9	FARMSHOPS / PICK-YOUR-OWN	YES	SD2
RCN1	OUTDOOR PLAYING SPACE	NO	
RCN2	PROVISION OF SPORTS FACILITIES	NO	
RCN3	NEW ARTS, ENTERTAINMENT AND LEISURE FACILITIES	YES	INF5 SD3
RCN4	RECREATION IN AONB /SLA /LPZ	NO	
RCN6	HORSE RIDING FACILITIES	NO	

RCN7	GOLF COURSES AND DRIVING RANGES	NO	
RCN8	RECREATIONAL AND COMMERCIAL USE OF PONDS AND LAKES	NO	
RCN9	NOISE NUISANCE CAUSED BY SPORTS IN THE COUNTRYSIDE	YES	SD15
RCN10	ALLOTMENTS	NO	
NCN3	PROTECTION OF OTHER SITES OF NATURE CONSERVATION OR GEOLOGICAL / GEOMORPHOLOGICAL INTEREST	NO	
NCN5	PROTECTION OF IMPORTANT NATURAL FEATURES / BIODIVERSITY	YES	SD10
NCN6	NEW AND RESTORED PONDS	NO	
AGR2	AGRICULTURAL DWELLINGS	NO	
AGR3	REMOVAL OF AGRICULTURAL WORKERS' OCCUPANCY CONDITIONS	NO	
AGR4	AGRICULTURAL DIVERSIFICATION	YES	SD2
AGR5	NEW AGRICULTURAL BUILDINGS	NO	
AGR6	RE-USE AND ADAPTATION OF RURAL BUILDINGS – GENERAL	NO	
AGR7	RE-USE AND ADAPTATION OF RURAL BUILDINGS – RETENTION OF CHARACTER	NO	SD11
	<b>LOCAL POLICIES</b>		
AC1	LAND ADJACENT TO RAILWAY AT NORTHWAY LANE, NORTHWAY	NO	
AC3	COWFIELD FARM SOUTH	NO	
BI1	GILDERS CORNER	NO	
BI2	NORTH OF DEAN FARM, BISHOPS CLEEVE	NO	
BI3	MALVERN VIEW, BISHOPS CLEEVE	NO	
BI4	CLEEVE BUSINESS PARK, BISHOPS CLEEVE	NO	
BR1	BROCKWORTH AND HUCCLECOTE HOUSING SITES	NO	
BR2	GLOUCESTER BUSINESS PARK	NO	
BR3	BROCKWORTH / HUCCLECOTE DISTRICT CENTRE	NO	
BR5	MILL LANE, BROCKWORTH	NO	
BR6	KENNEL LANE, BROCKWORTH	NO	
CH1	SOUTH EAST CAMP	YES	SD6
CH2	GLOUCESTERSHIRE AIRPORT	YES	SD6
CH3	ST JOHN'S AVENUE / PARTON ROAD	NO	
HU1	HUCCLECOTE ROAD, HUCCLECOTE	NO	
SD1	HILLVIEW NURSERIES, SHURDINGTON	NO	
SD2	FARM LANE / LECKHAMPTON LANE, SHURDINGTON	YES	SP2 SA1
SO1	NOVERTON LANE/MILL LANE, SOUTHAM	NO	
TY1	ACCESS TO THE RIVER NETWORK	NO	
TY2	LAND EAST OF PRIORS PARK	NO	
TY3	BISHOPS WALK / SPRING GARDENS	NO	
TY4	OLDBURY EMPLOYMENT SITE	NO	

TY5	BREDON ROAD, TEWKESBURY	NO	
TY6	TEWKESBURY – BACK OF MAIN STREETS	NO	
TY7	OLD RAILWAY LINE, TEWKESBURY	NO	
UC1	BARBRIDGE NURSERIES, UCKINGTON	NO	

### Superseded development plan policies and proposals

The list below shows which policies, supporting paragraphs and proposals of the adopted **Gloucester Local Plan 1983** (saved in 2007) will be replaced upon adoption of the JCS (in accordance with Regulation 8(5) of the Town and Country Planning (Local Planning) (England) Regulations 2012).

Local Plan Policy	Superseded by JCS ? Yes/ No/ Partial	Superseding JCS policy
Introduction	No	
Objectives	No	
Finance	No	
Employment policies	No	
E.1 Release of industrial land sufficient for 5 years requirement	No	

<b>Local Plan Policy</b>	<b>Superseded by JCS ? Yes/ No/ Partial</b>	<b>Superseding JCS policy</b>
E.2 Release of office development sufficient to cater for 5 years requirement	No	
H.1 – Release of land for residential development to cater for 5 years requirement	No	
H1c – Provision of additional housing sites to those identified in H1a will be encouraged in the city centre	No	
H1e – Density and quality of housing development	No	
H3 – Preservation and revitalization of older housing stock	No	
H4 Housing provision for those whose needs are not met by the private sector	Yes	SD12
H4.b Provision of grants for adaptation of homes for the registered disabled	No	
A1.a Heights of buildings and protection of views	No	
A2 Particular regard will be given to the city’s heritage in terms of archaeological remains, listed buildings and conservation areas	No	
A2.d Demolition of listed buildings in conservation areas	No	
A3.a Investigation and resolution of environmental problems caused by traffic on Bristol Road and Barton Street	No	
A.4e – Development on or around Robinswood Hill will not be permitted except where there are exceptional circumstances	No	
A.5a – The inclusion of tourist related uses within the comprehensive redevelopment of the Docks area will be encouraged.	No	
A.5c – Conservation and maintenance of structures and settings of City’s historic fabric (various sites)	No	
A.5d – Redevelopment of Blackfriars as a tourist attraction	No	
A.6a – Provision of coach parking facilitate at Westgate Street and the Docks	No	

<b>Local Plan Policy</b>	<b>Superseded by JCS ? Yes/ No/ Partial</b>	<b>Superseding JCS policy</b>
A7 – Encourage provision of an adequate level and mix of accommodation to satisfy visitor demand	No	
A7.a – Provision of appropriate self-catering accommodation. Conference Centre and central area hotels	No	
A7.b – Encourage Guest House developments along main radial routes and the city centre	No	
T1.e – Pedestrian priority within traffic management schemes in the main shopping area of the city.	No	
T1.f – Pedestrian priority in the city centre outside the main shopping area	No	
T2.d - Measures to facilitate rear access servicing	No	
T3 – Introduction of traffic regulation and control measures along Bristol Road and Southgate Street	No	
T3.a – Access to existing and future industrial premises will be assisted, where necessary, by traffic management and other measures	No	
T3.b – Consideration will be given to traffic management along Bristol Road	No	
T4.a- Differential charging of short and long stay car parks to discourage inappropriate use	No	
T4.k – Provision of car parking at private development in accordance with the Councils car parking standards	No	
T5.b – Early introduction of new bus services with new residential development	Yes	INF1, INF7
T6 – Measures will be introduced to encourage cycling	Yes	INF1, INF4, INF7
T6.c – Encourage cyclist-only routes	Yes	INF1, INF4, INF7
S1 – Main and strengthen Gloucester’s role as a sub-regional shopping centre and concentrate comparison shopping in the city except in exceptional circumstances	Yes	SD3
S1.a – Major comparison shopping will not usually be permitted outside the main shopping area	Yes	SD3

<b>Local Plan Policy</b>	<b>Superseded by JCS ? Yes/ No/ Partial</b>	<b>Superseding JCS policy</b>
S1.e – Conversion of shops to other uses at ground floor level will not normally be allowed in the main shopping area	No	
S2.b- Major convenience shopping will not usually be permitted outside the main shopping area	No	
S3 – Continued provision of shopping facilities to meet local needs outside the City Centre will be encouraged	No	
S3.a Neighbourhood shopping facilities will be encouraged and sometimes required in developing residential areas	No	
S3.b – The City Council will seek to maintain the existing neighbourhood shopping provision in the City	No	
L1 – Retain public open space, provision with new development, and attempt provision where a shortfall has been identified.	No	
L.1a- Retain existing areas of public open space	No	
L.1c – In new developments new public open space will be provided in accessible, centralised locations. They must be no less than half an acre in size.	No	
L.1d – Where public open space already exists or there is a need for recreational facilities other than open space we will consider the provision of alternative leisure facilities at the cost of the developer.	No	
L.2b – Seek to provide additional sports facilities on public open space in new developments.	Yes	INF7
L3.c Inclusion of leisure facilities within the docks redevelopment and financial contribution towards the cost of transferring the British Waterways museum to Gloucester	No	
L3.d – Maintenance and protection of Robinswood Hill Country Park	No	

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## Gloucester, Cheltenham & Tewkesbury



### Joint Core Strategy Proposed Main Modifications

### Sustainability (Integrated) Appraisal Addendum Report

October 2016





# Gloucester, Cheltenham & Tewkesbury Joint Core Strategy: Main Modifications

## Integrated Appraisal incorporating Strategic Environmental Assessment, Habitats Regulations Assessment, Health and Equality Impact Assessment

### Sustainability (Integrated) Appraisal Addendum Report:

*For and on behalf of Enfusion Ltd*

<i>date:</i>	<i>October 2016</i>	
<i>prepared by:</i>	<i>Barbara Carroll Cheryl Beattie</i>	
<i>checked by:</i>	<i>Barbara Carroll</i>	

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# Gloucester, Cheltenham & Tewkesbury Joint Core Strategy (JCS): Proposed Main Modifications Sustainability (Integrated) Appraisal (SA) Addendum Report

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## 1.0 INTRODUCTION & PURPOSE OF THE SA ADDENDUM REPORT

### Submission of the JCS & Examination (2015-2016)

- 1.1 The JCS (SUB 100) was submitted to the Planning Inspectorate in November 2014 and accompanied by the SA Report (October 2014, SASUB100-102), the Equality & Diversity Impact Assessment Report (SADR 113-115) and the HRA Report (October, 2013 SADR 116-121) in accordance with the Town & Country Planning (Local Planning) Regulations 2012, the National Planning Policy Framework, the SEA Regulations and the Habitats Regulations Assessment Regulations. The three stages of examination hearings between May 2015 and July 2016 have attracted considerable public participation and suggested amendments to the plan.
- 1.2 The Inspector's Interim Report<sup>1</sup> (May 2016, EXAM 232) sets out the conclusions of the examination to date, including recommendations with regard to main modifications to the JCS. Some matters and issues for the SA were raised and addressed during the hearings. Any proposed main modifications that might give rise to significant sustainability effects need to be subject to Sustainability Appraisal. The purpose of this SA Addendum Report is to:
- explain matters with regard to the SA that have been raised through the examination stages
  - demonstrate how the proposed main modifications have been screened for significance with regard to SA requirements
  - report the refreshed and new SA
- 1.3 The principle of resolving matters raised through examination by publication of an SA Addendum Report is established in English Case Law (see The Rochford Judgment<sup>2</sup>). SA is an iterative and ongoing process that aligns with the iterative plan-making process. There is no requirement to repeat previous appraisal studies and this SA Addendum Report addresses matters and issues arising from the examination and proposed modifications of the JCS. With regard to compliance with legislative and policy requirements, this SA Addendum Report comprises a further part of the SA Report as submitted in November 2014 and has been prepared in accordance with relevant guidance and legislative requirements. It seeks to be a proportionate assessment relevant to the stage of plan-making and in line with NPPF requirements (paragraph 167).

### Consultation Representations on the Submission SA Report (2014)

- 1.4 Representations were made through Hearing Statements submitted to the examination and included issues raised on the SA Report submitted with the JCS (November 2014). These SA concerns and responses to the issues raised

<sup>1</sup> <http://www.gct-ics.org/Documents/Examination-Document-Library-6/EXAM232---JCS-Inspectors-Interim-Findings---31052016.pdf>

<sup>2</sup> Cogent Land LLP v Rochford District Council (2012) EWHC 2542

are summarised (as they were at the time) in Appendix A of this report (Matter 6 Spatial Strategy May 2015 & Matter 8 Strategic Allocations July 2015). Concerns about the consideration of reasonable alternatives in the SA related to the strategic allocations proposed. These matters have been discussed through examination and considered through further plan-making such that many of the issues for the sites have been superseded - the main modifications to the JCS propose changes to the strategic allocations. These have been screened for their significance with regard to SA and where necessary, have been subject to refreshed or new appraisal. Thus, developments in plan-making have resolved and superseded the main concerns raised on the SA by changes in the proposed Strategic Allocations in Policy SA1. The implications for the SA are discussed in section 3 and detailed in Appendices B-C of this SA Addendum Report.

### **Revised Housing Requirement & Proposed Main Modifications**

- 1.5 Based on updated economic evidence and the Councils' revised economic strategy for the JCS area, the Inspector asserted in her Interim Report (May 2016 EXAM 232) that the Objectively Assessed Housing Need (OAHN) for the JCS area is 33,500 dwellings for the plan period 2011-2031. A policy uplift of 5% on 33,500 (1,675) making a total housing requirement (rounded) of 35,170 dwellings was recommended in order to provide more certainty and choice for delivery. The proposed Main Modifications are mostly concerned with this uplift in housing requirements and meeting this need through strategic allocations.

### **Structure of this SA Addendum Report**

- 1.6 The following section 2 summarises the approach and methods applied at this stage of the SA process. Section 3 summarises the findings of the further SA work with the details in technical appendices A-C. An overall summary and the next steps are provided in section 4.

## 2.0 METHODS

### Appraising Strategic Options

- 2.1 The Inspector's Interim Report (EXAM 232) included certain recommendations regarding consideration of new strategic options for proposed allocations and reconsideration of submitted strategic allocations to address matters raised and discussed during the examination. New strategic options were subject to detailed SA using the SA framework and methods previously reported (in 2014 (SASUB 100-102), and using any relevant updated baseline evidence, thus providing continuity and consistency of process.

### Screening Proposed Main Modifications for SA Significance

- 2.2 Many of the proposed changes to the GCT JCS are minor, concerned with correcting errors, addressing omissions, and providing more clarity. The main changes are associated with the requirement for the uplift in housing and the implications for the Strategic Allocations, together with the consultation concerns discussed at the examination hearings. The proposed changes were screened for their significance with regard to SA using professional judgment – do the changes, deletions and additions significantly affect the findings of the SA Report (2014) accompanying the JCS Submission and/or do they give rise to significant environmental/sustainability effects?

### SA of Strategic Allocations & the JCS with Proposed Main Modifications

- 2.3 The refreshed and new appraisals identified as required through the screening were carried out using the same methods and SA Framework of Objectives as the previous work, reported in 2014 (SASUB 100-102), and using any relevant updated baseline evidence, thus providing continuity and consistency of process. The appraisals were undertaken to the same level and by the same independent specialist consultants.

### HRA

- 2.4 The new proposed Strategic Allocations (A10 Winnycroft & A11 West Cheltenham), the amended Strategic Allocation (A1 Innsworth), and the other strategic options considered again (Fiddington & Mitton) were subject to HRA screening using the previous method and as described in the HRA Report May 2014 (SAPR 114-119).

## 3.0 SA FINDINGS

### Alternatives Considered for SA

- 3.1 The requirement for, and the consideration of, alternatives in the SA process and the interactions with the plan-making process are explained in detail in section 4 of the SA Report (SASUB 102-102). All strategic options considered to be reasonable (i.e. suitable and deliverable in the plan period) in plan-making have been subject to SA. As the emerging JCS has evolved through stages of consultation and evidence-gathering, development needs and proposed strategic allocations have changed.
- 3.2 It is a requirement of the SA process that the summary reasons for selecting and rejecting reasonable alternatives should be provided in the SA Report. Table 7.2 in the Submission SA Report (SASUB 100-102) presents this information. However, as a result of discussions during the examination hearings, updated evidence, and the proposed main modifications to the JCS, it is now possible to provide further details of the reasoning for the progression, or non-progression, of options for Strategic Site Allocations. This is presented in Table 3.1 on the following pages.
- 3.3 The Inspector in her Interim Report (EXAM 232) suggested reconsideration of certain strategic options for development allocation:
- Twigworth
  - Winnycroft
  - Brookthorpe/Whaddon & Hardwicke
  - Leckhampton
  - West Cheltenham
  - Fiddington
  - Mitton
- 3.4 The Twigworth site had been subject to detailed SA previously, as reported in October 2014 (SASUB100-102) and this has been refreshed to take into account updated baseline information, including from representations made at the examination. The Innsworth site had been subject to detailed SA previously, as reported in October 2014 (SASUB100-102) and this has been refreshed in accordance with the recommendations made in the Inspector's Interim Report (EXAM 232). Details of the SAs are provided in Appendix C to this SA Addendum Report.
- 3.5 Winnycroft is a new strategic site option and this was subject to SA to the same level as other options and the findings are detailed here in Appendix C.
- 3.6 Brookthorpe/Whaddon & Hardwicke sites had been previously subject to detailed SA and reported as non JCS sites in October 2014 (SASUB100-102). They were reconsidered but not taken forward as proposed Main Modifications since this would require agreement with Stroud Council and this

is not possible in the current timescales; they will be reconsidered again in future plan-making.

- 3.7 Significant reductions in housing numbers down to 200 dwellings were recommended for Leckhampton in consideration of high landscape and visual sensitivity. This mitigates the significant negative effects that had been found by the SA previously (SASUB100-102) and addresses concerns raised by representations at the examination. This much reduced potential housing allocation will be considered further now as a non-strategic site and within the Cheltenham Local Plan (CLP), including testing through SA with the SA Framework prepared for the CLP at the local level.
- 3.8 West Cheltenham had been initially subject to SA but not taken forward to submission; the SA was refreshed and is detailed in this report in Appendix C.
- 3.9 The strategic site option at Fiddington was subject to SA to the same level as other options and the findings are detailed here in Appendix C. It has not been taken forward as a strategic allocation due to deliverability concerns for this site, including transport issues around the A46 and M5 Junction 9 and the future infrastructure requirements. Therefore, this site is more appropriate for consideration through future review of the JCS or in the developing Tewkesbury Borough Plan (TBP) when transport issues are clearer. It will be tested through SA with the SA Framework prepared for the TBP at the local level.
- 3.10 Land at Mitton was reconsidered and a joint Planning Statement by the JCS authorities and Wychavon Council has been prepared. The Planning Statement provides a commitment to work together on the delivery of 500 dwellings in an early Phase 1 to be brought forward through the planning application process and contribute towards accommodating development growth for Tewkesbury; this counts towards the overall need identified for the GCT JCS. Any future Phase 2 of the site would be subject a future review of the South Worcestershire Development Plan (SWDP).
- 3.11 The Mitton site is not listed as a Main Modification in the JCS PMMs as it is not in the JCS area and thus cannot actually be allocated as such in the JCS Plan. However, it is clearly set out in Policy SP2 that the site is counting towards the JCS housing needs. The Mitton site had been previously subject to detailed SA and reported as a non JCS site in October 2014 (SASUB100-102). As required in the Inspector's Interim Report (EXAM 232), the SA of the Mitton site has been refreshed to take into account updated baseline information including discussions at the examination. The SA was refreshed and updated, including taking into account comments made at the examination, and the details are provided in Appendix C.

**Table 3.1: Options for Strategic Allocations (2013-4 & 2015-6) Reasons for Selection or Rejection in Plan Making**

Strategic Sites Options	Reasons for Selection or Rejection in Plan Making		
	Draft JCS 2013	Submission JCS 2014	JCS Proposed Modifications 2016
<p><b>Innsworth G1 Option 1</b> <b>Description:</b> H=55.7 ha, 1404 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities</p>	<p>G1 Option 1 combined with G1 Option 2 to provide a comprehensive approach to the development of the area. <i>Draft JCS 2013 Policy A1 – Innsworth and Twigworth Urban Extension, Gloucester.</i></p>	<p>The Twigworth part of the site has been removed from the allocation. The reason for its removal related to the recognition that the flood plain split the development of the site North/South (between Twigworth and Innsworth) and therefore created difficulties in providing a comprehensive Urban Extension.</p>	<p>Reassessment of the Twigworth site as part of a Strategic Allocation with Innsworth.</p> <p>Assessed as making only a limited contribution to the Green Belt; parts of the site outside the most hazardous flood zones so mitigation by avoidance; potential for integrating the two parts via green infrastructure.</p>
<p><b>Innsworth G1 Option 2</b> <b>Description:</b> H= 138.4 ha, 3488 dwellings; E= 9.1 ha; new junction from A40; 2 new primary schools and children's centres; 2 new local centres with community facilities</p>	<p>Taken forward (combined with G1 Option 1) because this option has the potential to provide a greater level of development. The flood plain in this location splits the development potential creating difficulties in providing a comprehensive urban extension. The inclusion of a site specific policy to address master-planning and the need to consider the area as a whole mitigates this concern. <i>Draft JCS 2013 Policy A1 – Innsworth and Twigworth Urban Extension, Gloucester.</i></p>	<p>Reduction in approximately 2,318 dwellings to 1,250; no change in employment land.</p> <p>Site specific requirements removed from A1 to avoid duplication in general Policy SA1</p> <p><b>Submission JCS 2014 Policy A1 – Innsworth</b></p>	<p>Twigworth capacity assessed at 1,363 dwellings, together with 1,300 at Innsworth; no change in employment land.</p> <p>Reinstatement of site specific requirements provides more certainty of mitigation for effects, especially on flood risk, GI and transport.</p> <p><b>Modified JCS Policy A1 Innsworth/A1a Twigworth</b></p>

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<p><b>Gloucestershire Airport G2 Option 1</b> <b>Description:</b> H=33.5 ha, 844 dwellings; new vehicular access from B4063; adjacent to Gloucestershire Airport</p>	<p>Taken forward because new housing development can be delivered alongside Gloucestershire Airport remaining as an operational facility subject to any constraints including airport safety zones. <b>Draft JCS 2013 Policy A2 – North Churchdown Urban Extension, Gloucester.</b></p>	<p>Reduction in dwellings to 530. <b>Submission JCS 2014 Policy A2 North Churchdown</b></p>	<p>Removed due to concerns at examination regarding effects on the Green Belt.</p>
<p><b>Gloucestershire Airport G2 Option 2</b> <b>Description:</b> H=33.5 ha, 844 dwellings; E=5.2 ha; new vehicular access from B4063 and Parton Road; adjacent to Gloucestershire Airport with employment land allocated on the airport to the North</p>	<p>Employment element not considered strategic in nature and therefore outside the context of the JCS; small scale employment development could be taken forward through an allocation in the Tewkesbury Local Plan.</p>		
<p><b>Gloucestershire Airport G2 Option 3</b> <b>Description:</b> H=33.5 ha, 844 dwellings; E=25.1 ha; new vehicular access from B4063 and Parton Road; new junction from A40 Golden Valley to new strategic employment allocation; retention of main runway function at airport; and employment land allocated on the airport to the North and South</p>	<p>This option is not being taken forward due to the need to retain Gloucestershire Airport as a key regional asset. Operational land is needed to meet the needs of the airport and loss of this land would impact adversely on the function of the Airport.</p>		
<p><b>Gloucestershire Airport G2 Option 4</b> <b>Description:</b> H=75 ha, 1889 dwellings; E=75 ha; new vehicular access from B4063, Parton Road and Bamfurlong Lane; new junction from A40 Golden</p>	<p>Not taken forward as Gloucestershire Airport is a key regional asset, and as such, is supported within the JCS. Wholesale redevelopment of the site is not considered an appropriate option.</p>		

<p>Valley to new strategic housing and employment allocation; major mixed use for redevelopment across the whole of the area currently occupied by the airport resulting in the closure of the airport.</p>			
<p><b>North East Gloucester G3 Option 1</b> <b>Description:</b> H= 315 dwellings (14.3 ha) with new accesses from distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; and Safeguarded site for park and Ride Extension</p>	<p>Not being taken forward as it does not deliver sufficient capacity to merit strategic allocation designation.</p>		
<p><b>North East Gloucester G3 Option 2</b> <b>Description:</b> H= 315 dwellings (14.3 ha); E= 17.4 ha employment land; new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; and Safeguarded site for park and Ride Extension</p>	<p>This option has been combined with G9 to provide a comprehensive approach to development to the south of Churchdown.</p>		
<p><b>Brockworth G4 Option 1</b> <b>Description:</b> H=46.5ha, E=13ha; 1172 dwellings; new roundabout from Valiant Way</p>	<p>Through discussion with the Gloucestershire LEP, it was considered that other employment sites more attractive to the market were available. Removing employment allocation offered the opportunity to deliver additional housing numbers in this location.</p>		

<p><b>Brockworth G4 Option 2</b> <b>Description:</b> H=61.7ha, 1555 dwellings; new roundabout from Valiant Way</p>	<p>Taken forward due to the need to deliver the objectively assessed housing need in a location that provides positive effects, including biodiversity improvements and good quality highways infrastructure. <b>Draft JCS 2013 Policy A4 – North Brockworth Urban Extension, Gloucester.</b></p>	<p>A decrease to 1,500 dwellings <b>Submission JCS 2014 Policy A4 North Brockworth</b></p>	<p>3 ha employment land to be delivered; no change in housing numbers. Reinstatement of site specific requirements provides more certainty of mitigation for effects. <b>Modified JCS Policy A4 North Brockworth</b></p>
<p><b>Brookthorpe / Whaddon</b></p>	<p>Not taken forward because the site is located outside the JCS area.</p>		<p>Reconsidered during examination; unable to bring forward site through the JCS at this stage as it is outside the JCS area and requires agreement with Stroud DC but will be reconsidered again in future plan-making.</p>
<p><b>Land South of Hunts Grove</b></p>	<p>Not being taken forward because the site is located outside the JCS area.</p>		<p>Now allocated through the Stroud Local Plan.</p>
<p><b>Land at Hardwicke</b></p>	<p>Not taken forward because the site is located outside the JCS area.</p>		<p>As above</p>
<p><b>Highnam G8 Option 1</b> <b>Description:</b> 1380 dwellings (54.8 ha); 4.2 ha of employment land; new community centre/ hub with retail and community facilities; new primary school; park and Ride; Improvements to highway infrastructure including to A40 junction serving Highnam.</p>	<p>This option is not being taken forward as it does not fit with the development strategy of the JCS. The strategy is focusing on the urban centres and urban extensions to Gloucester and Cheltenham.</p>		
<p><b>Highnam G8 Option 2</b> <b>Description:</b> 265 dwellings (12 ha)</p>	<p>This option is not being taken forward as it does not fit with the development strategy of the JCS. The strategy is focusing on the urban centres and</p>		

	urban extensions to Gloucester and Cheltenham.		
<b>South of Churchdown G9 Option 1</b> <b>Description:</b> H= 192 dwellings (8.7 ha)	This option is not being pursued as it does not deliver sufficient capacity to merit strategic allocation designation.		
<b>South of Churchdown G9 Option 2</b> <b>Description:</b> H= 315 dwellings (14.3 ha) with new accesses from distributor roads	This option has been combined with G3 (option 2) to provide a comprehensive approach to development to the south of Churchdown.		
<b>Churchdown G3 &amp; G9 Option 1</b> <b>Description:</b> H= 434 dwellings (19.7 ha); new accesses from existing distributor roads; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; and Extra Care Facility if evidence demonstrates need	This option is not being pursued as it does not deliver sufficient capacity to merit strategic allocation designation.		
<b>Churchdown G3 &amp; G9 Option 2</b> <b>Description:</b> H= 630 dwellings (25 ha) and E=17.4 ha of employment land; Elmbridge Park and Ride Scheme with new junction from A40 Golden Valley; Safeguarded site for park and Ride Extension; Extra Care Facility	These options taken forward because they provide major positive effects, for example highway infrastructure linkages, and provide a good balance of development including residential and employment. <b>Draft JCS 2013 Policy A3 – South Churchdown Urban Extension, Gloucester.</b>	Increase to 868 dwellings; no change in employment land. <b>Submission JCS 2014 Policy A3 South Churchdown</b>	Increase to 1,100 dwellings as increased capacity demonstrated through further studies by developer; no change in employment land. Reinstatement of site specific requirements provides more certainty of mitigation for effects. <b>Modified JCS 2016 Policy A3 South Churchdown</b>

<p><b>Land to the South of Gloucester G5</b></p>	<p>Options not progressed due to transport, poor connectivity, and biodiversity issues.</p>	<p>Sites south of Winnycroft Lane/Corncroft Lane included in the district capacity as part of the emerging Gloucester City Plan.</p>	<p>Considered at examination as they conform to the Spatial Strategy &amp; can deliver 620 dwellings on the built-up edge of Gloucester. Therefore, appropriate to include as a strategic allocation in the JCS. <b>Modified JCS 2016 Policy A10 Winnycroft</b></p>
<p><b>North Cheltenham C2 Option 1</b> Description: H=469 dwellings (18.6 ha)</p>	<p>Neither option is being taken forward for North Cheltenham. The inclusion of this site would not be in accordance with the Green Belt assessment methodology. It is also not considered that a new defensible Green Belt boundary can be established.</p>		<p>Reconsidered at examination &amp; suggested potential for small scale development in the area close to urban edge of Cheltenham; however, numbers not consistent with a strategic plan &amp; these smaller sites will be investigated through the emerging Cheltenham Local Plan.</p>
<p><b>North Cheltenham C2 Option 2</b> Description: H=759 dwellings (30.1 ha)</p>	<p>Neither option is being taken forward for North Cheltenham. The inclusion of this site would not be in accordance with the Green Belt assessment methodology. It is also not considered that a new defensible Green Belt boundary could be established.</p>		<p>As above</p>
<p><b>North West Cheltenham C3 Option 1</b> Description: H = 3074 – 5042 dwellings (139.4 ha); E = 11.6 ha employment land; and MU = 89.25 ha mixed use</p>	<p>Not taken forward due to the difficulty in ensuring that the new development was well integrated into the urban area of Cheltenham. Also the inefficiency of the layout would lead to a less comprehensive use of the site overall.</p>		
<p><b>North West Cheltenham C3 Option 2</b></p>	<p>Taken forward because the site performs well in sustainability terms and provides a good balance of development including residential and</p>		<p>Housing requirement reduced to 4,285 dwellings to provide a green buffer for Swindon</p>

<p><b>Description:</b> H = 4825 dwellings (184.1 ha); E = 23.3 ha employment land; and a safeguarded area.</p>	<p>employment, integrating well with the existing Kingsditch industrial estate. It is a layout which integrates well with the Cheltenham urban area, and allows for future development beyond the plan period provided for by safeguarding. <b>Draft JCS 2013 Policy A5 – North West Cheltenham Urban Extension, Cheltenham.</b></p>	<p><b>Submission JCS 2014 Policy A5 North West Cheltenham</b></p>	<p>village; employment land unchanged.</p> <p>Reinstatement of site specific requirements provides more certainty of mitigation for effects.</p> <p><b>Modified JCS 2016 Policy A5 North West Cheltenham</b></p>
<p><b>West Cheltenham C5 Option 1</b> <b>Description:</b> E = 36.5 ha of employment land</p>	<p>Not taken forward due to the lack of effective access to the site for significant employment use. Also the need to sufficiently mitigate odour in this location is likely to harm development viability. It is proposed that a new Green Belt boundary is established in this area to safeguard land for future development if future odour mapping and changes to activity at the Hayden Works reduce the development exclusion zone. <b>Draft JCS 2013 as a safeguarded area for future development in Policy S5.</b></p>		<p>Reconsidered at examination with change from safeguarded land to allocation as an urban extension. Employment-led site with about 45 ha of B-class led employment uses; and 1,100 dwellings.</p> <p>Reinstatement of site specific requirements provides more certainty of mitigation for effects.</p> <p><b>Modified JCS 2016 Policy A11 West Cheltenham</b></p>
<p><b>South Cheltenham C6B Option 1</b> H = 822 dwellings (37.3 ha)</p>	<p>Option taken forward because it provides a suitable quantum of housing development well related to the existing urban area whilst creating a sound new green belt boundary. <b>Draft JCS 2013 Policy A7 – South Cheltenham – Up Hatherley Urban Extension, Cheltenham.</b></p>	<p>Deleted as overall numbers of housing reduced &amp; provided an opportunity to reconsider the apportionment between the 3 authorities.</p>	<p>Not identified as a sustainable option through the examination and Interim Report.</p>
<p><b>South Cheltenham C6B Option 2</b></p>	<p>Not taken forward as it was considered that other suitable employment locations were available which offered</p>		

H = 422 dwellings (16.75 ha) and employment land (17 ha)	the opportunity to increase housing numbers at this location.		
<b>South Cheltenham C6 Option 1</b> <b>Description:</b> H = 558 dwellings (25.3 ha) and E = 6.8 ha of employment land	This option is not taken forward owing to the low development quantum of residential development proposed, also this option would not comprehensively use the Leckhampton allocated site within Tewkesbury Borough.		
<b>South Cheltenham C6 Option 2</b> <b>Description:</b> H = 1101 dwellings (43.7 ha) and E = 6.8 ha of employment land	Not taken forward as it was considered that other suitable employment locations were available which offered the opportunity to increase housing numbers at this location. This option would not comprehensively use the sites available including the existing site allocated within Tewkesbury borough.		
<b>South Cheltenham C6 Option 3</b> <b>Description:</b> H=1169 dwellings (39.7 ha) and E = 6.8 ha of employment land	Not taken forward because it did not fully take account of the Environment Agency's and the SFRA level 2 view of flood risk in the North Eastern part of the site, and intruded into sensitive Green Belt around Brizen Farm. Considered that other suitable employment locations were available which offered the opportunity to increase housing numbers at this location.		
<b>South Cheltenham C6 Option 4 =</b> <b>Description:</b> H=1075 dwellings (43.62ha)	Option taken forward because it provides a good quantum of housing development without intruding into the Green Belt or AONB. It also preserves important green corridors and reduces flood risk to new development. <b><i>Draft JCS 2013 Policy A6 – South Cheltenham – Leckhampton Urban Extension, Cheltenham.</i></b>	<b><i>Submission JCS 2014 Policy A6 South Cheltenham Leckhampton</i></b>	Significant reductions in housing numbers arising from concerns at examination with regard to high landscape & visual sensitivity. Removal of 377 dwellings from Tewkesbury side & 547 from Cheltenham side reduces the capacity below that of a JCS strategic site; to be considered

			further within the Cheltenham Local Plan.
<b>Land at Milton</b>	Not taken forward as the site is located outside the JCS area and would rely on agreement from Wychavon District Council. The location does not fit with the JCS spatial strategy. There were also concerns about flood risk.		Reconsidered at examination. Planning Statement prepared with Wychavon District Council for consideration of an early Phase 1 scheme of approximately 500 dwellings at Milton to be brought forward through the planning application process, with Phase 2 to be subject to a future review of the SWDP.
<b>Land at Fiddington T3</b>	Not taken forward as concerns about transport.		Recommended by Inspector as a potential Strategic Allocation for 900 dwellings at examination. However, not taken forward as concern over transport infrastructure issues around the A46 & M5 J9 and future requirements; more appropriate for consideration through future review of the JCS or in the developing Tewkesbury Borough Plan when transport issues are clearer.
<b>MOD T2</b> <b>Description:</b> Total allocation area = 128.7 ha of which H =2238 dwellings and MU = 80 ha of mixed use land	Option taken forward because it recognises the potential of a brownfield opportunity which will come forward during the plan period and provides a proactive response to what will be a		Reinstatement of site specific requirements provides more certainty of mitigation for effects.



	vacant site plus additional land to the north. <b><i>Draft JCS 2013 Policy A8 – MOD Site at Ashchurch Strategic Allocation.</i></b>	<b><i>Submission JCS 2014 Policy A8 MOD Site at Ashchurch</i></b>	<b><i>Modified JCS 2016 Policy A8 MOD Site at Ashchurch</i></b>
<b>Ashchurch T3</b> E = 14.3 ha of employment land	Option taken forward because it provides a strategic allocation close to the motorway junction, which aligns with the emerging LEP strategy and offers an opportunity to build and strengthen the existing employment offer in this location. <b><i>Draft JCS 2013 Policy A9 –Ashchurch Strategic Allocation.</i></b>	<b><i>Submission JCS 2014 Policy A9 Ashchurch</i></b>	Reinstatement of site specific requirements provides more certainty of mitigation for effects.  <b><i>Modified JCS 2016 Policy A9 Ashchurch</i></b>

## Screening Modifications for SA Significance

- 3.12 The proposed Main Modifications were screened for their significance with regard to SA and the reasoning for any refreshed or new appraisal is provided in Appendix B of this SA Addendum Report. The most significant change is the updated economic evidence that results in an adjusted OAHN of 33,500 dwellings. This is further increased by the Inspector's recommendation in her Interim Report (EXAM 232) to include a 5% uplift to assist in delivering much needed affordable homes, give more certainty of delivery, and increase the chances of maintaining the required five-year supply. This makes a total housing requirement of 35,170 dwellings and this represents a significant increase on the submitted housing requirement of about 30,500 new homes over the plan period.
- 3.13 The implications for the SA are with regard to the effects on the implementation of the JCS as a whole with Policies and Strategic Allocations, including cumulative effects. The increased housing allocations have been developed through changes to the Strategic Allocations. Accordingly, the implications for the SA are considered for each Strategic Allocation individually.

## Modifications to Strategic Allocations; Additional Strategic Allocations JCS Policy SA1 Strategic Allocations A1-A11

- 3.14 **A1 Innsworth:** The course of the Hatherley Brook with the functional floodplain splits the two elements of the potential strategic site with the Twigworth part to the north and the Innsworth part to the south. This had been considered to be a concern at the JCS Submission stage (Nov 2014) with apparent difficulties for integration and provision of a comprehensive Urban Extension. Overall, the SA had found positive effects with no major negative effects, although some uncertainties were indicated for natural resources and sustainable transport were reported through the SAs of options for A1 & A1a (SASUB 100; SAPR107 & 122); the SA for the Innsworth element was refreshed and the details are provided in Appendix C.
- 3.15 **A1a Twigworth:** This site was reconsidered as a result of the Inspector's Interim Report, through hearing statements and discussions at the examination. Further information and masterplanning was available from the promoters of development for part of this site. The masterplan produced for the 750 dwelling development demonstrates that housing will only be built in Flood Zone 1 thus avoiding risk, and the two site elements will be integrated through green infrastructure proposals for Flood Zones 2 & 3, including footpaths to provide integration as part of a sustainable transport network. The SA for the Twigworth element was refreshed and the details are provided in Appendix C.
- 3.16 The revised Policy **A1 Innsworth/A1a Twigworth** now includes the reinstatement of site-specific development requirements (i-xv) and at least 5 specific infrastructure requirements. These specific requirements remove any uncertainties that had been previously reported by the SA; they demonstrate that mitigation and enhancement measures will be implemented to confirm

positive effects, and avoid significant negative effects, for community facilities & services, green infrastructure & biodiversity; flood risk management; landscape; and sustainable transport. The requirement for traffic access and a new main road junction from the A40 will further mitigate potential negative effects on the transport network. Overall, the findings of the refreshed SA indicate positive effects, mitigation of negative effects, and removal of uncertainty reflecting stronger positive effects for sustainable development.

- 3.17 **A2 North Churchdown:** This strategic allocation has been removed from Policy SA1 and the JCS in consideration of concerns regarding the Green Belt raised during the examination.
- 3.18 **A3 South Churchdown:** Updated evidence has indicated that the housing numbers can be increased from 868 to approximately 1,100 new homes, with employment land unchanged at 17.4 hectares. The revised Policy A3 now includes the reinstatement of 13 site-specific development requirements (i-xiii) and at least 4 specific infrastructure requirements. These specific requirements remove any uncertainties that had been previously reported by the SA; they demonstrate that mitigation and enhancement measures will be implemented to confirm positive effects, and avoid significant negative effects, for community facilities & services, green infrastructure & biodiversity; flood risk management; landscape; and sustainable transport.
- 3.19 The specific requirement for some 50 ha of green infrastructure including enhancement of visual linkages, safeguarding of specific ancient woodland, and habitat creation to complement the Horsebere Flood Management Scheme demonstrates that any negative effects will be mitigated with certainty of implementation; also consideration of the interactions between factors. The specific requirement for respecting landscape character and separation of villages mitigate any concerns and uncertainty of any negative effects.
- 3.20 Key specific requirements for transport that are being investigated include a new access junction from the A40, promotion of travel plans and high quality public transport will help mitigate any negative effects on the transport network from the increased development. Sustainable modes of transport are promoted and require enhancement to national Sustrans route 41. This will further mitigate for potential negative effects from increased development and remove any uncertainties for implementation. Overall, the findings of the refreshed SA indicate positive effects, mitigation of negative effects, and removal of uncertainty reflecting stronger positive effects for sustainable development.
- 3.21 **A4 North Brockworth:** The housing proposed for 1,500 homes has not changed. A 3ha allocation for employment land has been proposed and this will have positive effects for SA objectives on employment/economy. It may contribute to reducing negative effects on SA objectives for transport by facilitating travel to work by sustainable modes but overall, the minor change is not likely to have significant effects on the previous findings of the SA.

- 3.22 **A5 North West Cheltenham:** Concerns were raised at the examination with regard to the number of dwellings proposed and the high landscape/visual impact sensitivity generally to the north west of the strategic allocation. The Inspector recommended that a green buffer should remain around the village of Swindon in consideration of landscape/visual amenity and the settings of heritage features (EXAM 232). This displaces proposed housing and reduces the allocation from 4,785 to 4,285 homes.
- 3.23 The SA had found minor long-term negative effects on SA Objectives for landscape and green space (SASUB 100; SAPR108 & 122). The proposed change to the allocation by reducing the numbers of houses will lessen the negative effects identified and further mitigation is provided through the reinstatement of site-specific development requirements. This includes clear guidance on requirements for layout and form of development that respects landscape character and separation of villages, respects the character and setting of heritage assets, and takes into account indicative Local Green Spaces.
- 3.24 The revised Policy A5 now includes 15 site-specific development requirements (i-xv) and at least 6 specific infrastructure requirements. These specific requirements remove any uncertainties that had been previously reported by the SA; they demonstrate that mitigation and enhancement measures will be implemented to confirm positive effects, and avoid significant negative effects, for community facilities & services, green infrastructure & biodiversity; flood risk management; landscape; heritage, and transport, including guidance on access to the highways network and requirements for sustainable movement. Overall, the findings of the refreshed SA indicate positive effects, mitigation of negative effects, and removal of uncertainty reflecting stronger positive effects for sustainable development.
- 3.25 **A6 South Cheltenham Leckhampton:** Removed from the Plan. Concerns were raised during examination with regard to the very high landscape/visual amenity sensitivity and the likely impacts of traffic generation. The Inspector recommended that this should be removed from the Strategic Allocations but that a modest level of development for about 200 dwellings could be considered towards the north of the area with more accessible public transport and less landscape impacts (EXAM 232). This would be appropriate then for consideration in the emerging Cheltenham Local Plan. The SA had found major negative effects (SASUB 100; SAPR108) with regard to landscape and visual impact. Accordingly, removal of this Strategic Allocation will mitigate negative effects by avoidance.
- 3.26 **A8 MoD Ashchurch:** This Strategic Allocation is now retained to provide housing during the plan period to 2,125 homes; the allocation for employment land remains unchanged at 20 hectares. This is the same as the Submission version of the Plan and is not significant with regard to the SA. However, the reinstatement of site-specific requirements for development will mitigate any potential negative effects arising and help ensure implementation of mitigation measures thus removing uncertainty.

- 3.27 The revised Policy A8 now includes 10 site-specific development requirements (i-x) and at least 4 specific infrastructure requirements. These specific requirements remove any uncertainties that had been previously reported by the SA; they demonstrate that mitigation and enhancement measures will be implemented to confirm positive effects, and avoid significant negative effects, for community facilities & services, green infrastructure & biodiversity (particularly minimising negative effects on Carrant Brook habitats); flood risk management; landscape; heritage, and transport. The modified Policy A8 recognises the specific issues for this allocation with regard to potentially complex remediation. Overall, the findings of the refreshed SA indicate positive effects, mitigation of negative effects, and removal of uncertainty reflecting stronger positive effects for sustainable development.
- 3.28 **A9 Ashchurch:** The Strategic Allocation remains unchanged with 14.3 ha of employment land. The revised Policy A9 now includes 8 site-specific development requirements (i-xiii) with particular consideration of transport needs. These specific requirements remove any uncertainties that had been previously reported by the SA; they demonstrate that mitigation and enhancement measures will be implemented to confirm positive effects, and avoid significant negative effects, particularly for landscape, green infrastructure & biodiversity, flood risk management, and transport. The certainty of implementing requirements to mitigate negative effects on transport and movement will enhance the minor positive effects identified in the previous SA. Overall, the findings of the refreshed SA indicate positive effects, mitigation of negative effects, and removal of uncertainty reflecting stronger positive effects for sustainable development.
- 3.29 **A10 Winnycroft:** Two sites south of Winnycroft Lane/Corncroft Lane were suggested by the Inspector as suitable for strategic allocation when conjoined and likely to deliver around 600 homes. This conforms to the Spatial Strategy and a planning application is already made for up to 420 dwellings on one of the sites. As this is a new proposed strategic site that has not previously been subject to strategic SA, a detailed SA was undertaken and is provided in this SA Addendum Report at Appendix C.
- 3.30 The SA found key positive effects associated with provision of high quality housing, supporting infrastructure, accessibility, and potential for restoration of a priority habitat. Potential negative effects were associated with increased traffic and air quality, loss of greenfield land, and heritage assets and settings. The SA recommended that site-specific development requirements included mitigation for potential negative effects to the historic environment.
- 3.31 Policy A10 includes 12 site-specific development requirements (i-xii) with particular consideration green infrastructure, recreation, flood risk management, form and layout that respects landscape and heritage assets, and transport. These requirements should mitigate negative effects and reduce uncertainties identified in the SA.
- 3.32 **A11 West Cheltenham:** An additional employment-led site was identified by the JCS team and allocation was recommended by the Inspector (EXAM 232). This is a new site with 1,100 dwellings and 45 ha employment, located on

the edge of Cheltenham and conforming to the Spatial Strategy. Earlier considerations of a site to the west of the city had been limited due to the Development Exclusion Zone with odour issues from the Hayden Waste Water Treatment Works (WWTW). However, studies by Severn Trent Water (EXAM 125a, December 2015) have investigated options to resolve the situation and a commitment has been made by the water company to do this at the earliest opportunity to enable development of the land.

- 3.33 The SA found positive effects for most SA objectives, with major positive effects for housing, economy, and restoration/enhancement of biodiversity. Potential negative effects were associated with loss of greenfield/Green Belt, and increased traffic on the transport network. However, these potential effects are mitigated by the 12 site-specific requirements (i-xii) in Policy A11, including transport and sustainable modes, landscape buffer, and a layout that addresses the proximity to the WWTW. The requirements for green infrastructure, including the Hatherley Brook, the Fiddlers Green, and integration of important hedgerows, will provide certainty of implementation of mitigation/enhancement – confirming major positive effects.

### **Cumulative Effects of Modifications to Strategic Allocations**

- 3.34 The proposed changes to the Strategic Allocations have been developed in response to updated evidence and to resolve concerns raised during examination. Although housing numbers over the whole JCS area are increased significantly from 30,500 to 35,170 dwellings with potential cumulative effects, negative effects will be mitigated through the reinstatement and refinement of site-specific development and infrastructure requirements in each of the SA1 Policies (A1-A11). The apportionment of housing for each authority has been adjusted in line with the approach agreed at examination (EXAM 232 paragraphs 52-54) – that strategic allocations should be located where that need arises.
- 3.35 **Gloucester:** A1 has a slight increase in capacity from 1,250 to 1,300 dwellings; A2 is removed from the JCS to resolve concerns about the Green Belt; A3 is increased from 868 to 1,100 dwellings; no changes at A4; new site at A10. Overall, the apportionment to Gloucester has increased from 11,300 to 14,359 dwellings which is significant with regard to SA and particularly cumulative effects from the increased scale of development. However, as explained above (3.5-3.11) for each site, the site-specific development and infrastructure requirements remove uncertainty, providing strong mitigation measures to avoid or ameliorate negative effects – individually and cumulatively. These significant policy modifications and the removal of A2 resolves concerns raised by consultees for Green Belt and mitigates cumulative negative effects on landscape identified through the SA by avoidance. The additional housing and site specific requirements will confirm positive effects on SA objectives, including cumulative effects.
- 3.36 **Cheltenham:** A5 reduced from 4,785 to 4,285; A6 removed; and new site A11. Overall, the apportionment to Cheltenham is increased from 9,100 to 10,917 which is significant with regard to SA and particularly with regard to the likely cumulative effects from the increased scale of development. As with the

increased development at Gloucester, the site-specific requirements in the modified policies remove uncertainty, mitigate negative effects, and confirm positive effects - individually and cumulatively. These significant policy modifications and the removal of A2 resolves concerns raised by consultees and mitigates cumulative negative effects on landscape/visual amenity as identified through the SA by avoidance.

- 3.37 **Tewkesbury:** A8 increased from 2,125 to 2,325 homes & overall estimated at 2,726 homes; A9 no change. Overall, the apportionment to Tewkesbury has decreased slightly from 10,100 to 9,899 and this is not considered significant with regard to cumulative effects and the SA. Nonetheless, the inclusion of site-specific requirements for A8 & 9 will improve the sustainability of the strategic sites in the same way as described above for Gloucester and Cheltenham areas.

### **SA of Implementing the Main Modifications to the JCS**

- 3.38 The SEA Regulations require assessment of the overall implementation of the Plan, taking into account the aims, policies and site allocations. The proposed modifications to SP1, SP2 and SA1 reflect the updated evidence for housing need, concerns raised by consultees and discussed during examination, and the reconsideration of the role of the individual district level plan capacities. The overall increase in development now proposed for the JCS could have cumulative negative effects – particularly with regard to transport and landscape/visual amenity. However, this has been mitigated through the removal and amendment of certain sites, and the inclusion of site-specific development and infrastructure requirements; these will also confirm certain positive effects such as provision of green infrastructure.
- 3.39 Minor amendments of deletions, additions, corrections were made to many of the JCS Policies and these provide clarification and enhance guidance for development. These changes are not significant with regard to the SA. The significant changes to SP1, SP2 & SA1 have been considered and reported above. SD4 Sustainable Design loses the requirement for 10% or more energy from renewable or low carbon sources – in line with changed national policy. This affects the SA with less certainty of mitigation of negative effects on climate change but is unlikely to be significant overall for implementation of the JCS. SD6 removes a small area of Green Belt to better define the Green Belt boundary and allow for a small local plan allocation around Arle Nurseries. This is not considered to be significant with regard to SA and this strategic level JCS plan.
- 3.40 Minor changes to SD7-10 Landscape, Historic & Biodiversity make explicit that new development will not cause unacceptable adverse impacts. This affects the SA and will reinforce and confirm the certainty of mitigation measures for significant negative effects; this strengthens the findings of the SA. INF 1- Transport includes a new specific requirement to consider the implications of cumulative impacts. This will strengthen the SA findings and reduce some uncertainty for mitigation of negative effects with regard to implementation of the JCS as a whole – and for each authority area.

### **HRA Updated**

- 3.41 The HRA was updated to take account of the proposed modifications to the JCS, with particular consideration of the changes to the Strategic Site Allocations. The approach taken was in accordance with available guidance, good practice, and advice from the relevant regulators (Natural England & Natural Resources Wales) and as described in the HRA Report (SAPR114-119) submitted with the JCS. The HRA concluded that the submission JCS would not have adverse effects, alone or in-combination, on the integrity of the identified European sites.
- 3.42 Some concern was expressed by Natural England (NE) regarding potential effects from proposed strategic sites on the Cotswold Beechwoods Special Area of Conservation (SAC). An HRA Addendum Report was produced in May 2015 (SAPR 119a) that concluded that whilst there is a need for further detailed discussions between the Councils and Natural England regarding the management of the SAC and mitigation measures, the policy mechanisms are in place to deliver them. These discussions have continued and culminated in a Statement of Cooperation (SUB108C pages 119-124) between the Councils and Natural England.
- 3.43 The proposed modifications to the JCS that are significant with regard to the HRA process are the two new strategic allocations A10 Winnycroft and A11 West Cheltenham. These were subject to HRA screening and details are provided here in this SA Addendum Report at Appendix C. Strategic Site Allocation A11 is located over 7.5 km from the closest European site (Cotswold Beechwoods SAC) and is unlikely to lead to any significant effects. Strategic Site A10 is located approximately 2.3 km from the Cotswold Beechwoods SAC with the potential for likely significant effects (LSEs) arising from increased traffic on the A46 (air quality) and increased recreational use (disturbance). However, these potential LSEs will be mitigated by the recommendations previously described (SAPR114-119), the development of the Statement of Cooperation with NE, the final wording of JCS Policy SD10 Biodiversity & Geodiversity, and the site specific development requirements including transport mitigation.
- 3.44 The updated HRA concluded that the Proposed Modifications for the JCS will not have adverse effects, alone or in-combination, on the integrity of the identified European sites.



## 4.0 SUMMARY & NEXT STEPS

- 4.1 Reconsideration of strategic options and Proposed Main Modifications have been made to the GCT JCS as a result of updated evidence, particularly the Objectively Assessed Housing Need, concerns raised from consultation, discussion during the examination, and the Inspector's findings (EXAM 232). Most changes to the JCS are minor, concerned with correcting errors, addressing omissions, and providing more clarity. The main changes are associated with the requirement for the uplift in housing and the implications for the Strategic Allocations.
- 4.2 The SA screened the Proposed Modifications for their significance with regard to the SA process. Full appraisals were undertaken for the new Strategic Allocations A10 & A11. The significant changes proposed for SP1, SP2 and SA1 have been considered with a refreshed SA, including the implications for implementation of the JCS as a whole and for each of the 3 authority areas. The HRA process was also updated with a screening of the 2 new Strategic Allocations A10 & A11; this concluded that the Proposed Modifications for the JCS will not have adverse effects, alone or in-combination, on the integrity of the identified European sites.
- 4.3 Overall, the Proposed Modifications will confirm positive effects previously identified, particularly for housing. The changes will strengthen and confirm implementation of mitigation measures, particularly through the removal of SA1 A2 & A6 and inclusion of site-specific development and infrastructure requirements in SA1 A1-A11. This will improve the overall sustainability of the JCS, including mitigating the negative effects previously identified through the SA, especially with regard to landscape/visual amenity; and transport. It will further confirm mitigation and potential enhancement for effects on biodiversity and green infrastructure.
- 4.4 Thus, this Integrated Appraisal (SA, SEA & HRA) has shown that the JCS Proposed Modifications clearly demonstrate implementation of effective mitigation measures for negative effects and overall, the sustainable development of the JCS has been enhanced through the examination.
- 4.5 The Proposed Modifications to the JCS and this accompanying SA Addendum Report will be placed on public consultation through the JCS website. Representations received will be considered and it is expected that the JCS will then be adopted early in 2017. An SA Adoption Statement will also be published and this will include reporting how the SA has influenced the plan-making process.

## Appendix A: Consultation Representations through Hearing Statements & Issues Raised at Examination (Stage 1 May 2015; Stage 2 July 2015)

**Note:** It should be noted that these responses were as they were made at the time they were written; many of the sites and matters raised have now been superseded.

### Matter 6: Spatial Strategy

No. Consultee Matter Number SA Issue Raised	SA Issue Raised	Summary Response with evidence where possible/relevant
8917345 APT Planning for Pye Homes	Q93 Unclear how alternative options were assessed against the results of the SA	Detailed in Appendix VIII (Oct 2013); discussed in paragraphs 7.17-27 (pages 66-68) of SA Report (June 2014).
Boyer on behalf of Bloor Homes & Persimmon Homes	Q84 SA confirms the chronology of developing the strategy for UEs at Gloucester & Cheltenham – summarised at paragraphs 4.10, 7.85-6 of the SA Report.	Noted.

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6166561 Gladman Developments Ltd	Q93 At Developing the Preferred Option (Feb 2012) 4 options A-D considered. Suggest an additional scenario incorporating further dispersal in combination with an urban focus (including a number of SUEs) should have been considered as a reasonable alternative. Such a hybrid option would enable a degree of urban concentration but with less requirement for release of Green Belt. SA (May 2014) appraised 3 options A-C (urban focus; rural dispersal; new settlement). It is unclear why no further distribution strategies were not subject to SA.	The SA of the Spatial Strategy options (A urban focus, B rural dispersal, C new settlement) was refreshed in Oct 2013.  A further hybrid option with less urban focus & more rural dispersal was not tested through SA at that time since it was not considered to be a reasonable alternative – It would not have met with objectives of the JCS and the development needs at Gloucester, Cheltenham & Tewkesbury Town. However, this was not explicitly explained in the SA Report.
Hunter Page on behalf of Bloor Homes Western	Q90 Too much pressure on existing service villages; could have considered other options such as promoting hubs.	As above
	Q93 SA considered 3 options – urban; rural; new settlement. It should have considered further option that focuses a greater proportion of growth away from urban areas & Green Belt – eg by removing UE at Churchdown & displacing to Tewkesbury or the service villages.	As above. Transferring some 1400 homes to Tewkesbury Town was not considered to be a reasonable alternative at the time since this would not meet the needs of Gloucester nor comply with the strategic objectives. However, this was not explicitly explained in the SA Report.
Hunter Page Planning on behalf of ERLP2 & SMV	Q93 Adopted urban focus shows clear advantages over other 2 options subject to SA & therefore the strategy is sound.	Noted.

Hunter Page Planning on behalf of Brockhampton Lane Consortium	Q93 Adopted urban focus with UEs to Cheltenham & Gloucester is the most sustainable option.	Noted.
Hunter Page Planning on behalf of Redcliff Homes	Q93 Adopted urban focus with UEs to Cheltenham & Gloucester is the most sustainable option.	Noted.
Hunter Page Planning on behalf of MG Property Consultants	Q93 SA considered 3 options – urban; rural; new settlement. It should have considered further option that focuses a greater proportion of growth away from urban areas & Green Belt – eg by removing UE at Churchdown & displacing to Tewkesbury or the service villages.	As above
Hunter Page Planning on behalf of Spitfire Properties LLP	Q93 considered 3 options – urban; rural; new settlement. Appears to be no consideration of a further option that focuses a greater proportion of growth away from urban areas & Green Belt – eg by removing UE at Churchdown & displacing to Tewkesbury or the service villages. Evidence suggested to support increased jobs and realignment of housing numbers to Tewkesbury Borough.	As above
Ken Pollock	Q93 No evidence of careful sustainability reasoning <u>before</u> the UE strategy was focused into Green Belt.	As above and explained in Section 5, 6 & 7 of the SA Report.

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9138817 Origin3 on behalf of Taylor Wimpey (Bristol)	Alternative option not on Green Belt & adjacent to SE Gloucester (where there is need) – site at Whaddon (in Stroud District).	Details of SA in Appendix VIII(a) Oct 2013 for potential site allocations and non-JCS sites for Gloucester; reasons for selection/rejection provided in Table 7.2 SA Report (June 2014).
3150814 Pegasus on behalf of Robert Hitchins Ltd	Q93 The strategy proposed is supported.	Noted.
9106017 RPS for Barratt Homes West	Q93 Comfortable that the councils have tested reasonable strategic alternatives for the JCS area – but not with regard to options for Tewkesbury Town. Land at Mitton (broad location T1a) has sustainable credentials.	Details of SA in Appendix VIII(c) Oct 2013 for potential site allocations and non-JCS sites for Tewkesbury; reasons for selection/rejection provided in Table 7.2 SA Report (June 2014).
RPS for Bovis Homes & Miller Homes	Q94 The distribution strategy can support further increases in housing provision without significant adverse impacts. SA tested 4 scenarios & scenario C performed the best in overall sustainability (para 6.20) – this at 36,850 is significantly higher than the 31,040 proposed.	Noted.
Sworders on behalf of HA Day & son	Q84 insufficient justification “infrastructure & sustainability factors” for discounting the greater dispersal of development as a reasonable alternative.	Paragraphs 7.23-24 in SA Report (June 2014) provide clarification and further explanation of effects predicted and reasons for non-progression of the rural dispersal option.

## Matter 8: Strategic Allocations

No. Consultee Matter Number SA Issue Raised	Summary Response with evidence where possible/relevant
<b>A3 SOUTH CHUCHDOWN</b>	
<p>3150814 <b>Pegasus on behalf of Robert Hitchins Ltd</b></p> <p>The SA does not appraise sites equally &amp; if a revised assessment was to be undertaken, the Innsworth option (including Twigworth) would be appraised even more favourably than the South Churchdown site (regardless of the Green Belt issue).</p>	<p>The SAs reported in 2013 &amp; 2014 reflect the iterative &amp; ongoing processes of plan-making &amp; appraisal that progressed from consideration of broad locational searches (to avoid major significant constraints/negative effects; to maximise potential opportunities) to more detailed testing with development quanta. The approach is explained in sections 4-6 and summarised in paragraphs 7.28-29 of the SA Report (June 2014).</p> <p>The SA appraised 8 potential strategic allocations – variously of 1-4 reasonable options each. Two options were considered for Innsworth &amp; four options considered for Churchdown. Details are reported in Appendix VIII (a) of the SA Reports (2013 &amp; 2014). Summary findings of the SA of options for Gloucester are discussed in paragraphs 7.30-7.55; reasons for selection/rejection of potential site allocations are provided in Table 7.2 (pages 81-83 for Gloucester).</p> <p>It is inappropriate to apply any weightings or addition to SA of effects – each sustainability factor is tested against its own standards and the overall SA framework includes both qualitative and quantitative assessments. The findings of the SA need to be considered as a whole.</p> <p>It should also be noted that, whilst the SA informs plan-making, it is not the only factor in decision-making. A direct comparison between the SA findings for 2 options/potential site allocations around Gloucester is not really applicable.</p>

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	<p>The proposed site allocations have developed from broad locational searches through options for site allocations – and taking into account the whole JCS area and the development needs in accordance with the Spatial Strategy. Each site option was subject to SA and the findings informed decision-making.</p>
<p>Para 157.5                  The Oct 2014 SA assessed sites on the basis of the draft JCS with individual policies for each strategic allocation A1-9.</p> <p>These policies have now been deleted and the infrastructure previously required is no longer specifically referenced – detailed specific matters are to be considered at the next level of plan-making.</p>	<p>Agreed - the SA in 2013 tested strategic site options with draft individual policies A1-A9, including specific site requirements that provided mitigation for certain effects. This is reported in section 7 of the SA Report (June 2014).</p> <p>The changes to plan-making for the Pre-Submission JCS, including the change from A1-9 to SA1 with all the strategic allocations into one policy without site specific requirements, are discussed in section 8 of SA Report (June 2014).                  These JCS changes were subject to screening for significance with regard to the SA and the findings are presented in table 8.1 (page 126 for SA1).</p> <p>Site specific mitigation was removed as it duplicates the requirements of and mitigation provided by other JCS policies, for example, SD5 Design, SD9 Historic, SD10 Biodiversity, INF3 Flood Risk Management, and INF4 Green Infrastructure.                  The SA found that these changes from A1-9 to SA1 were not significant (with regard to the SEA Regulations) since mitigation for potential negative effects is provided by other SD and INF Policies. The findings of the Oct 2013 SA remain valid. The updated SA findings are reported in paragraphs 8.8-8.19 of the June 2014 SA Report; paragraph 8.20 summarises the influence of the SA on the preparation of the Pre-Submission JCS from the Draft JCS.</p>
<p>Para 157.6-7                  Comparison of SA for Innsworth G1 (option 2) vs Churchdown G3/G9 (option 2)</p>	<p>The development of the potential site allocations has considered all the options for the JCS and not just Innsworth (option 2) vs Churchdown (option 2) – a direct comparison between the SA findings for 2</p>

<p>G1 (2) assessed more positively for 3 SA objectives, less for 2 – therefore, Twigworth/Innsworth more sustainable than South Churchdown.</p>	<p>options/potential site allocations around Gloucester is not really applicable.</p> <p>Not clear which SA Objectives are being referenced. G1 (2) was found to have minor negative effects for SA Objective No 6 Resources Quantity whilst G3/G9 (2) for this SA Objective was partly minor negative with partly major positive effects. This difference is associated with the larger amount of land being set aside for landscape/GI purposes (compared to G3/9 (1)); minor negative effects for both options relate to loss of agricultural land Grade 3.</p> <p>It is inappropriate to apply weighting or addition to SA findings; each factor is assessed according to its own standards &amp; baseline sensitivity – and the SA needs to be considered as a whole to inform decision-making.</p>
<p>Para 157.8                  Pages 14 &amp; 150 of SAPR107 Appendix VIIIa – South Churchdown option is assessed as major positive effect on flooding. The Innsworth option (including Twigworth) is assessed as having major positive/uncertain effects. The justification text for these appraisals is identical for both sites but the scoring is different and does not therefore justify different assessments.</p>	<p>The SA text for G1 (2) explains that there is some uncertainty of positive effects when comparing G1 (1 – 1404 dwellings) and G1 (2 – 3075 dwellings) due to the higher quantum of development and relative demands on flood capacities.</p> <p>This uncertainty was removed as development management Policies (especially INF3 flood risk management) were further developed and is reported in Table 7.3 of the SA Report (June 2014) with both A1 and A3 showing potential major positive effects with regard to SA Objective No 4 Flooding.</p>
<p>Para 157.9                  The South Churchdown option is assessed as having major positive/minor negative effects on Natural Environment Resources. The Innsworth (including</p>	<p>We assume this refers to SA Objective No 6 Natural Environment &amp; Resources: Use (soils/land – greenfield/pdl; water use). As explained above, the minor negative effects relate to the loss of agricultural land Grade 3 &amp; it is agreed that the major positive effects relate to the</p>



<p>Twigworth) option is assessed as having a minor negative effects. The justification for the South Churchdown appraisal explicitly relies on the policy wording which has been deleted from the Draft JCS, namely the provision of a new strategic buffer to be provided along the northern side of the A40 Golden Valley. Although the green infrastructure is shown on the indicative site layout 3, this is for guidance and not part of the policy. The detailed site specific appraisals therefore appear out of date.</p>	<p>greater area of land set aside for landscape/green infrastructure (compared to G3/G9 (1) and G9 1 &amp; 2).</p> <p>It is agreed that the changes from A1-9 to SA1 in the JCS removed the site specific requirements, including the green infrastructure. The SA screened these changes and found that the mitigation was still provided through other Policies such that the potential major effects indicated for South Churchdown A3 was still valid and as reported in Table 7.3 of the SA Report (June 2014).</p>
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## Appendix B: SA Screening of Proposed Main Modifications for SA Significance

**Note:** Most Policies and Strategic Allocations include changes to provide clarification and correction of any errors; these are not reported here as they are not significant with regard to SA.

Policy Number & Description	Summary of Changes, Deletions and Additions	Screening - do the changes, deletions and additions significantly affect the findings of the GCT JCS SA Report (May 2014) accompanying JCS Submission and/or do they give rise to significant environmental effects?
<p><b>SP1: Scale of New Development</b></p>	<p>Housing and employment provision has changed based on updated economic evidence<sup>1</sup> to give an adjusted OAHN of 33,500 dwellings (2014 – 30,500, 2013 – 33,200) for the JCS area for the Plan period (2011-2031) to accommodate the proposed 39,500 jobs target.</p> <p>With a 5 % uplift to 35,175 as recommended by the Inspector, the housing requirement for each authority has changed to numbers at least (2014 &amp; 2013 figures in brackets):</p> <p>Cheltenham 10,917 (9,100, 10,000) Gloucester 14,359 (11,300, 13,100) Tewkesbury 9,899 (10,100, 10,100)</p>	<p>The increase from 30,500 to 35,175 dwellings is significant with regard to the 2013 SA and its updating in 2014 – and therefore requires refreshed SA. Please note that Appendix XII (SA May 2014) details the refreshed SA of 3 housing scenarios (33,200, 30,900, 30,500). Findings included uncertainties and no significant differences between scenarios. Further explanation with regard to strategic options tested is provided by EXAM 66 (June 2015).</p> <p>The effects of this increase in housing numbers is manifested through the amendments to each of the Strategic Allocations (Policy SA1) – so the updating of the Sustainability Appraisal reflects cumulative effects for the whole JCS area and is summarised in section 3 of the SA Addendum Report; details for each Strategic Allocation where necessary is detailed in Appendix C.</p> <p>Changes to employment land will be assessed through the updating of the relevant SAs of Strategic Allocations for SA1.</p>

<sup>1</sup> EXAM 164

	The employment provision was increased from 28,000 to approximately 39,500 new jobs and provision of a minimum of 192 hectares of B-class employment land.	
<b>SP2: Distribution of New Development</b>	Changes to reflect the above overall increases in housing and employment identified through updated evidence and discussion at examination.	Changes are significant with regard to cumulative effects for each authority and the overall cumulative effects of implementing the JCS – but as above, any significant effects arise through the changes to Strategic Allocations. Gloucester and Tewkesbury are likely to have a shortfall, and maybe also Cheltenham. Summarised in section 3 of the SA Addendum Report; details for each Strategic Allocation where necessary are detailed in Appendix C.
<b>SD2: Employment</b>	Minor clarification and updating.	Not significant with regard to SA.
<b>SD3: Retail &amp; City/Town Centres</b>	Clarification & to reflect changes in retail; revised definitions of city/town centres.	Not significant with regard to SA.
<b>SD4: Sustainable Design &amp; Construction</b>	Changes to reflect changed national policy regarding securing 10% or more of energy from renewable or low carbon sources.	This affects the SA with less certainty of mitigation of negative effects on climate change – but unlikely to be significant overall for the implementation of the JCS as a whole.
<b>SD5: Design</b>	No Changes.	N/A
<b>SD6: Green Belt</b>	Minor clarification and updating; removal of small area of Green Belt to better define the Green Belt boundary and allow for a small local plan allocation around Arle Nurseries.	Not significant with regard to strategic SA and the JCS.
<b>SD7-10: Landscape, Historic &amp; Biodiversity</b>	Clarifications & minor changes to make explicit that new development will not cause unacceptable adverse impacts.	Change will reinforce and confirm the certainty of mitigation measures for significant negative effects.
<b>SD13</b>	Clarification & changes to align with changes to national policy.	Not significant with regard to SA.

<b>Affordable Housing</b>																
<b>INF 1 Transport Network</b>	INF 1 & 2 integrated; clarification. Inclusion of requirement to consider "cumulative impacts".	The new specific requirement to consider the implications of cumulative impacts will strengthen the SA findings and reduce some uncertainty for mitigation of negative effects with regard to implementation of the JCS as a whole – and for each authority area.														
<b>INF3 Flood Risk</b>	Minor clarification and updating.	Not significant with regard to SA.														
<b>INF4 Green Infrastructure</b>	Minor addition for specifying the R Severn area as a potential Regional Park.	Not significant with regard to SA.														
<b>INF5 Social &amp; Community Infrastructure</b>	Minor addition to justification text.	Not significant with regard to SA.														
<b>INF6 Energy</b>	Minor updating to reflect Government policy.	Not significant with regard to SA.														
<b>INF6 &amp; 7 Delivery &amp; Contributions</b>	Minor updating and clarification.	Not significant with regard to SA.														
<b>SA1: Strategic Allocations Policy</b>	<p>Changes to the Strategic Allocations, including removal of two – A2 North Churchdown &amp; A6 Leckhampton – and inclusion of two new sites – A10 Winnycroft &amp; A11 West Cheltenham. Housing Changes:</p> <table border="1"> <tr> <td>A1 Innsworth</td> <td><del>1250</del> to 1300</td> </tr> <tr> <td>A1a Twigworth</td> <td>1600</td> </tr> <tr> <td><del>A2 North Churchdown</del></td> <td><del>532</del></td> </tr> <tr> <td>A4 North Brockworth</td> <td>1500</td> </tr> <tr> <td>A5 NW Cheltenham</td> <td><del>4785</del> to 4285</td> </tr> <tr> <td><del>A6 Leckhampton</del></td> <td><del>1124</del></td> </tr> <tr> <td>A8 MoD at Ashchurch</td> <td>5</td> </tr> </table>	A1 Innsworth	<del>1250</del> to 1300	A1a Twigworth	1600	<del>A2 North Churchdown</del>	<del>532</del>	A4 North Brockworth	1500	A5 NW Cheltenham	<del>4785</del> to 4285	<del>A6 Leckhampton</del>	<del>1124</del>	A8 MoD at Ashchurch	5	Significant with regard to SA. Changes are significant with regard to cumulative effects for each authority and the overall cumulative effects of implementing the JCS – but as above, effects arise through the changes to the Strategic Allocations.
A1 Innsworth	<del>1250</del> to 1300															
A1a Twigworth	1600															
<del>A2 North Churchdown</del>	<del>532</del>															
A4 North Brockworth	1500															
A5 NW Cheltenham	<del>4785</del> to 4285															
<del>A6 Leckhampton</del>	<del>1124</del>															
A8 MoD at Ashchurch	5															

	<table border="1"> <tr> <td>A9 Ashchurch</td> <td>N/A</td> </tr> <tr> <td>A10 Winneycroft</td> <td>620</td> </tr> <tr> <td>A11 West Cheltenham</td> <td>1100</td> </tr> </table>	A9 Ashchurch	N/A	A10 Winneycroft	620	A11 West Cheltenham	1100	<p>Reinstatement of site specific requirements for each Strategic Allocation to provide further detailed guidance on development; also each site policy sets out key principles &amp; infrastructure requirements.</p> <p>New clause 4 in policy that requires sites to provide appropriate scale and mix of uses...that support and complement the role of existing settlements and communities.</p> <p>Removal of clause concerning provision of new Gypsy, Traveller &amp; Travelling Showpeople sites to align with changed Government policy.</p> <p>Changes to individual Strategic Allocations are summarised below:</p> <p>This reinstatement of site specific requirements, &amp; inclusion of principles and infrastructure requirements, is significant with regard to the SA as this makes mitigation possibilities and commitments more certain of implementation, thus removing uncertainty of mitigation for likely negative effects.</p> <p>Explicit requirement for supporting and complementing existing settlements and communities will make more certain the positive effects previously assessed.</p> <p>Policy SD14 sets criteria for proposals.</p>
A9 Ashchurch	N/A							
A10 Winneycroft	620							
A11 West Cheltenham	1100							
<b>Gloucester</b>								
<b>A1 – Innsworth &amp; A1a Twigworth</b>	<p>Increase in housing from 1,250 to 1,300. Reinstatement of the Twigworth part of the site (1350 dwellings) to the allocation, comprising an increase from some 1250 to approximately 2,650 new homes.(i-xv)</p>	<p>Appendix XI (SA May 2014) included a fresh detailed appraisal addressing the removal of the Twigworth part of the site. With updated evidence from the developer(s) and informed by the discussions at the examination (reported in EXAM 232), the SA is refreshed separately for the Twigworth part and the Innsworth part with the detailed findings presented in Appendix C. Implications for</p>						

	No change in 9.1 ha employment land.  Site-specific requirements plus infrastructure requirements.	the SA as a whole and each authority area reported in section 3 of the SA Addendum Report.
<b>A2 North Churchdown</b>	Removed.	Implications for the SA as a whole and each authority area considered in section 3 of the SA Addendum Report.
<b>A3 South Churchdown</b>	Increase in housing from 868 to 1,100 new homes and new provision for 17.4 ha of employment land. Site-specific requirements (i-xiii) plus at least 4 infrastructure requirements.	Implications for the SA as a whole and each authority area considered in section 3 of the SA Addendum Report.
<b>A4 North Brockworth</b>	No change – retained at 1,500 new homes. New provision for 3 ha of employment land. Site-specific requirements (i-xiii) plus at least 5 infrastructure requirements.	Implications for the SA as a whole and each authority area considered in section 3 of the SA Addendum Report.
<b>A10 Winnycroft</b>	Two Sites south of Winnycroft Lane & Corncroft Lane with S106s agreements being negotiated for the larger site by Gloucester City Council.	Additional sites as proposed urban extension not progressed in draft & submission JCS – therefore significant with regard to SA and subject to a full SA, details provided in Appendix C of this SA Addendum Report.
<b>Cheltenham</b>		
<b>A5 NW Cheltenham Urban Extension</b>	Housing provision reduced from 4, 785 to 4,285; employment land not changed, remaining at 23.4 ha. Site-specific requirements (i-xv) plus at least 6 infrastructure requirements.	Significant. Implications for the SA as a whole and each authority area considered in section 3 of the SA Addendum Report.
<b>A6 – South Cheltenham Leckhampton</b>	Removed. Reduction of 377 dwellings from Tewkesbury side & Cheltenham side	Significant. Implications for the SA as a whole and each authority area considered in section 3 of the SA Addendum Report.

	from 747 to 200 dwellings resulted in an overall potential housing allocation that is too small for a strategic site and more appropriately considered within the emerging Cheltenham Local Plan.	
<b>[A7: South Cheltenham-Up Hatherley]</b>	Not taken forward for Submission. No change.	N/A. No change.
<b>A11 West Cheltenham</b>	Employment-led site – approximately 45 ha and approximately 1,100 dwellings. Site-specific requirements (i-xii); No specific infrastructure requirements.	C5 Option 1 subject to SA (Oct 2013). Significant change & subject to full SA with the detailed findings presented in Appendix C. Implications for the SA as a whole and each authority area considered in section 3 of the SA Addendum Report.
<b>Tewkesbury</b>		
<b>A8 MoD Site at Ashchurch</b>	Increase in housing from 2,125 to 2,726 new homes; No change in 20 ha employment land.  Site-specific requirements (i-x) plus 4 infrastructure requirements.	Significant. The SA is refreshed and Implications for the SA as a whole and each authority area reported in section 3 of the SA Addendum Report.
<b>A9 Ashchurch</b>	14.3 employment. No change to scale/ type of development.	No change.
<b>Land at Mitton</b>	Policy SP2 explains that 500 houses will be committed in an early phase and count towards the identified need for the JCS and to contribute towards accommodating growth in Tewkesbury.	The Mitton site is not listed as a Main Modification in the JCS PMMs as it is not in the JCS area and thus cannot actually be allocated as such in the Plan. However, as this is a significant change to the JCS, the SA has been refreshed & subject to full SA with the detailed findings presented in Appendix C. Implications for the SA as a whole and each authority area considered in section 3 of the SA Addendum Report.

## Appendix C: Detailed SA of Modified Strategic Allocations; Other Strategic Options Considered; HRA Screening

### Contents:

Fiddington

Innsworth

Mitton

Twigworth

West of Cheltenham

Winnycroft Lane/Corncroft Lane

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Categories of Significance		
Symbol	Meaning	Sustainability Effect
x	Absolute constraints	Absolute sustainability constraints to development, for example, internationally protected biodiversity
--	Major Negative	Problematical and improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive
-	Minor negative	Potential sustainability issues: mitigation and/or negotiation possible
+	Minor positive	No sustainability constraints and development acceptable
++	Major Positive	Development encouraged as would resolve existing sustainability problem
?	Uncertain	Uncertain or Unknown Effects
0	Neutral	Neutral effect
-	+	The SA Objectives 5, 6, 9, 13 and 14 consider more than one topic and as a result the plan could have different effects upon each topic considered. For example, Objective 6 includes a number of topics including soils, previously developed land, water use and Green Belt. A site/ policy within the plan could have a negative effect on the topic Green Belt but also have a positive effect on previously developed land and therefore this could lead to two symbols being shown.



**Potential Strategic Allocation: Fiddington**

<b>Sustainability Objective</b>		<b>Assessment of Effect</b>	
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years) / long term (10-20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
		<b>Description:</b> 900 dwellings (and a school and local centre)	
		<b>Initial SA Summary Report (2011) Ref:</b> Broad Location T3	
<b>1</b>	<b>BIODIVERSITY</b>  Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	There are no international, or national nature conservation designations on or adjacent to the allocation site which could be directly affected <sup>1</sup> . The site is predominantly arable and characterised by fields surrounded by hedgerows, with opportunities to enhance biodiversity. There are small areas of Deciduous Woodland BAP Priority Habitat in the south of the site. Development has the potential to restore and enhance the BAP priority habitats, and improve community access to this area, in line with Policy SD10, with the potential for major positive effects. Protected species should be safeguarded in line with Policy SD10.	<b>++</b>
<b>2</b>	<b>CLIMATE CHANGE MITIGATION</b>  Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	There is the potential to reduce contribution to climate change on the site through compliance with Policy SD4 which requires increased energy efficiencies. This is likely to lead to minor positive effects on climate change mitigation.  The positive effects depend upon implementation of other policies including; SD4 on sustainable design, SD5 advising design requirements, and policies which seek to encourage a modal shift, including Policy SD5.	<b>+</b>
<b>3</b>	<b>CLIMATE CHANGE ADAPTATION</b>  Adapt to the consequences of climate change	In accordance with Policy SD4 all development will be expected to be adaptable to climate change in respect of the design, layout, siting, orientation and function of buildings and external spaces. Therefore, the effects on climate change adaptation are expected to be minor positive. [ It should be noted that flooding is considered separately under SA Objective 4.]	<b>+</b>
<b>4</b>	<b>FLOODING</b>		<b>0</b>

<sup>1</sup> Defra Magic Map Application. Online at <http://magic.defra.gov.uk>

	Manage and reduce flood risk and surface water run-off	The northern boundary of the site is located within an area of flood risk (zones 2 and 3) and this area is also at risk of surface water flooding <sup>2</sup> . It is considered that development on site could easily avoid these areas, and the Position Statement for the site identifies that preliminary assessment concludes that there is no significant flooding or drainage issues. Policy INF3 requires new development to incorporate suitable Sustainable Drainage Systems to manage surface water drainage, which should mitigate any potential negative effects. Potential for a residual neutral effect.		
<b>5</b>	<b>NATURAL ENVIRONMENT AND RESOURCES: QUALITY</b>  Protect and improve the quality of natural resources including soil, water and landscape	The site option is not located within or adjacent to any landscape designations and the previously the Position Statement identifies that site as of low landscape value. There is the potential for minor positive effects on landscape character through habitat restoration (as identified against the topic of biodiversity) and positive contributions to Green Infrastructure in line with Policy INF4.  The site option partially overlies a minor aquifer of intermediate and high vulnerability <sup>3</sup> . Development could have minor negative effects on groundwater quality from contaminated run-off particularly during construction.	+	-
<b>6</b>	<b>NATURAL ENVIRONMENT AND RESOURCES: USE</b>  Minimise the use of natural resources including soil, water and Greenfield land through good design	The effects on the use of natural resources will depend upon the design and construction methods to be used at the development management level. Mitigation for potential negative effects arising is provided through Policy SD4.  The site option is not located within the Green Belt, however, it is predominantly greenfield land. Development at the site option could result in the loss of Grade 3b agricultural land with the potential for minor long-term negative effects on the use of natural resources through the loss of agricultural land.		-
<b>7</b>	<b>HISTORIC ENVIRONMENT</b>  Protect and enhance the area's distinctive historic environment	There are no designated heritage assets within or immediately adjacent to the site, and development is unlikely to affect any heritage settings. Policy SD9 provides mitigation for the historic environment and seeks to conserve heritage in a manner appropriate to its significance. Development is unlikely to lead to any significant effects, with the potential for a neutral effect.		0

<sup>2</sup> Environment Agency (2016) Flood Maps - Risk of Flooding from Rivers and Sea, and Risk of Flooding from Surface Water [online] <http://apps.environment-agency.gov.uk/wiyby/37837.aspx>

<sup>3</sup> Environment Agency (2016) Drinking Water Safeguard Zones and Groundwater Maps [online] <http://apps.environment-agency.gov.uk/wiyby/37837.aspx>

<b>8</b>	<b>SUSTAINABLE TRANSPORT</b>  Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by private car	<p>Previous SA work identifies that the site is well located in relation to Ashchurch and Tewkesbury, and a new local centre will support access to services and facilities. The Position Statement identifies that there are also opportunities to improve public transport with the potential for minor long term positive effects.</p> <p>Given the size of the allocation it is likely there could be both short-term (during construction) and long-term negative effects on the existing road network with potential for congestion. Mitigation may be required (and is available) to reduce potential negative effects. Mitigation is also provided through policies SD5 and INF7 which seek to reduce the potential negative effects of increases in traffic, improve accessibility and reduce the need to travel. Overall it is considered that there is the potential for a residual minor negative effect with an element of uncertainty at this stage.</p>	<table border="1"> <tr> <td style="background-color: #92d050;">+</td> <td style="background-color: #ffff00;">- ?</td> </tr> </table>	+	- ?
+	- ?				
<b>9</b>	<b>WASTE AND POLLUTION</b>  Minimise pollution and waste to landfill	<p>There are no historic landfill or pollution / waste related facilities or incidents within close vicinity of the site option. Given the scale of development proposed, there are likely to be negative effects as a result of increased waste production, both in the short-term during construction and residential waste in the longer term. Mitigation provided through Policy SD4 should ensure that development will not lead to any significant negative effects, particularly through the requirement for a waste minimisation statement in large development proposals.</p> <p>The site is not located within an AQMA, however, it is likely that there could be both short-term (during construction) and long-term negative effects on air quality through increased traffic as a result of development. Mitigation for potential increases in traffic is noted above in the topic of sustainable transport.</p> <p>Overall it is considered that there is the potential for residual minor long-term negative effects on waste and pollution as a result of development at the site option.</p>	<table border="1"> <tr> <td style="background-color: #ffff00;">-</td> </tr> </table>	-	
-					
<b>10</b>	<b>THE ECONOMY</b>	The site option is proposed for housing development and as such is unlikely to lead to any significant long term effects on the economy. Potential for a neutral effect.	<table border="1"> <tr> <td style="background-color: #0070c0;">0</td> </tr> </table>	0	
0					

	Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses		
11	<b>CITY AND TOWN CENTRES</b>  Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	Previous SA work identifies that the site is well located in relation to Ashchurch and Tewkesbury, and is expected to support the vitality and viability of both Ashchurch's and Tewkesbury's town centres with the potential for major long term positive effects.	++
12	<b>SUSTAINABLE COMMUNITIES: EQUALITY</b>  Reduce inequalities in wellbeing and opportunity	The allocation could provide a chance to reduce inequalities in wellbeing and opportunity through providing housing and employment opportunities and an improved transport network to create better access to services and facilities for all. At present, the effects are considered to be uncertain and may depend on negotiations at the development management level.	?
13	<b>SUSTAINABLE COMMUNITIES: SAFETY</b>  Reduce crime and the fear of crime	The allocation could provide an opportunity to reduce crime as new housing could provide high quality and safe homes.  Mitigation provided through Policy SD5 should ensure that there will be no significant negative effects, potential for a residual neutral effect with an element of uncertainty at this stage.	0 ?
14	<b>HEALTH</b>  Improve access to health facilities and promote healthy lifestyles	The allocation provides the opportunity for the creation of new high quality homes, which will have minor indirect positive effects on health.  Furthermore, Policies INF5 and INF7 seek the appropriate provision or accessibility to open space, which may lead to positive effects on health, with the potential for major long-term effects if implemented successfully. This will depend in part on ensuring that Green Infrastructure provided as a result of development includes provisions for long term management.	+

15	<b>HOUSING</b>  Ensure everyone has access to a decent home that they can afford and meets their needs	The site option is likely to lead to major long term positive effects on housing through the provision of 900 new high quality homes.	++
16	<b>GREEN SPACE</b>  Create, enhance, protect, connect and improve access to open spaces	The site option is greenfield arable land and development will ultimately remove this green space constituting a long term minor negative effect on green space. However, development at this large site is likely to deliver new green space, or provide significant contributions to enhancing existing green space, which could result in higher quality open spaces with the potential for minor long term positive effects.	+
17	<b>EDUCATION AND SKILLS</b>  Improve access to education and life-long learning and enhance skills	The site option does not propose educational / training facilities and as such is unlikely to lead to any significant effects against this SA Objective. The effects remain uncertain at this stage but are likely to be neutral.	0 ?
18	<b>CULTURE AND TOURISM</b>  Protect and enhance cultural heritage and promote tourism	Given the nature of the site option, as housing and employment development, effects on this SA Objective are considered to be neutral.	0

**Summary of Key Negative and Positive Effects for Sustainable Development:**

The site option is located on a parcel of land to the south east of Tewkesbury, in between the existing urban area to the north, the M5 motorway to the west and open land to the south and east. The site option would support the SA Objectives of Biodiversity; Climate Change - Mitigation; Climate Change- Adaptation; Natural Environment and Resources - Quality; Sustainable Transport; City and Town Centres; Health; Housing and Green Space. There is the potential for minor negative effects on the SA Objective of Natural Environment and Resources - Use; Natural Environment and Resources - Quality; Sustainable Transport; and Waste and Pollution as a result of the large scale of development proposed.

**Key Negative Effects:**

- Development will result in the loss of greenfield and Grade 3b agricultural land

- Development is likely to increase traffic on the highways network, and indirectly negatively affect air quality

**Key Positive Effects:**

- The provision of new, high quality housing and supporting infrastructure (including new green space) which is resilient to the effects of climate change
- Delivery of development within an accessible location, with the potential to extend existing public transport routes
- Potential for restoration of a BAP Priority Habitat

Strategic Allocation: A1 Innsworth			
	<b>Sustainability Objective</b>	<b>Assessment of Effects</b> Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making	
		<b>Description:</b> 1300 dwellings; E=approx. 9 ha; new local centre, school, GI network in FZ 2&3, new junction to A40	
		<b>Initial SA Summary Report (2011) Ref.:</b> part of original broad location G1-Land North of Gloucester <b>2104 SA:</b> H=55.7 ha, 1250 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities	
1	<b>BIODIVERSITY</b> Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	<p>There are no internationally protected habitats<sup>4</sup> on or adjacent to the site although there is one nationally protected area Innsworth Meadow – as a SSSI and Priority BAP<sup>5</sup> Habitat for lowland meadow (condition - recovering favourable). Therefore, no significant negative effects on protected biodiversity. There is some 40-50% overlap by area with this meadowland in the NW corner of the proposed housing with potential negative effects but also potential positive effects if the meadowland could be improved as part of the masterplanning.</p> <p>There are no LNRs in the area (see SA Objective No 16 Green Space). A strong area of GI following the valleys of the Hatherley Brook is indicated on the proposals map. There are possibilities for very positive effects by enhancing the protected lowland meadow with improved connectivity to a wider managed floodplain habitat –both in the short and longer terms. Potential for new GI along the Hatherley Brook to be actively managed for biodiversity purposes in line with Policy INF4 will have major positive effects.</p> <p>The implementation and effectiveness of mitigation measures and potential enhancement is more certain with the reinstatement of site specific requirements in Policy SA 1 (and other Core Policies together with clear planning briefs and masterplanning), including new GI.</p>	++

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<sup>4</sup> Defra (2014) Magic – Statutory Rural Designations - <http://magic.defra.gov.uk>

<sup>5</sup> Gloucestershire County Council Biodiversity Delivery Plan - <http://www.gloucestershirebap.org.uk>

**Strategic Allocation: A1 Innsworth**

		<b>Assessment of Effects</b>	
<b>Sustainability Objective</b>		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making	
		<b>Description:</b> 1300 dwellings; E=approx. 9 ha; new local centre, school, GI network in FZ 2&3, new junction to A40	
		<b>Initial SA Summary Report (2011) Ref.:</b> part of original broad location G1-Land North of Gloucester <b>2104 SA:</b> H=55.7 ha,1250 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities	
		The presence of protected species is unknown at this stage and there could be potential for the allocation to directly destroy habitat or indirectly cause pollution/ disturbance. Mitigation is provided in the wording of SD10 & site specific requirements in SA1.	
<b>2</b>	<b>CLIMATE CHANGE MITIGATION</b>  Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	There is potential to reduce contribution to climate change on the site through compliance with Policies SD4, SD5 and INF4. This is likely to lead to minor positive effects in the long-term on climate change mitigation.	<b>+</b>
		The effects also depend upon implementation and details of other policies. Overall, the urban extension approach will better promote possibilities for delivery of climate change mitigation.	
<b>3</b>	<b>CLIMATE CHANGE ADAPTATION</b>  Adapt to the consequences of climate change	The requirements reducing flood risk under Policy INF3 will contribute to positive effects for climate change adaptation (and see SA Objective No. 4 Flooding following).	<b>+</b>
		The scale of urban extension developments offers more possibilities for delivery of resilience and SUDS.  Climate change adaption measures are required by Policy SD4 and as a result, the effects on climate change adaptation are expected to be minor positive.	
<b>4</b>	<b>FLOODING</b>		<b>++</b>

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**Strategic Allocation: A1 Innsworth**

		<b>Assessment of Effects</b>	
<b>Sustainability Objective</b>		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making	
		<b>Description:</b> 1300 dwellings; E=approx. 9 ha; new local centre, school, GI network in FZ 2&3, new junction to A40	
		<b>Initial SA Summary Report (2011) Ref.:</b> part of original broad location G1-Land North of Gloucester <b>2104 SA:</b> H=55.7 ha, 1250 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities	
	Manage and reduce flood risk and surface water run-off	The Hatherley Brook is subject to flooding (Zone 2 and 3) <sup>6</sup> . The strategic site allocation proposes development outside the flood zones and GI in the flood zones thus reducing flood risk. The requirement for flood storage betterment across the site as recommended in SFRA2 <sup>7</sup> to improve the capacity of the floodplain upstream of Longford will have wider positive effects for flood risk management.  Policy INF3 and this will have positive effects in short to long-term.	
<b>5</b>	<b>NATURAL ENVIRONMENT AND RESOURCES: QUALITY</b>  Protect and improve the quality of natural resources including soil, water and landscape	The site lies within a drinking water protected area which is identified as being 'probably at risk' and lies on a minor aquifer which is considered to be of high vulnerability. <sup>8</sup> Development could have minor negative effects on groundwater quality from contaminated run-off particularly during construction. Further mitigation to protect water quality at the development management level in line with that provided by Policies INF3, SD15 and SD4 may be required.	○

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<sup>6</sup> Environment Agency (2014) Flood Maps. Online at (maps.environment-agency.gov.uk)

<sup>7</sup> Halcrow Group Ltd (July 2012) Gloucester, Cheltenham & Tewkesbury Joint Core Strategy. Strategic Flood Risk Assessment for Local Development Framework Level 2. Online at <http://www.gct-jcs.org/EvidenceBase/StrategicFloodRiskAssessment.aspx> [Accessed March 2014]

<sup>8</sup> Environment Agency (2014) Flood Maps – Risk of Flooding from Rivers and Sea. Online at (maps.environment-agency.gov.uk)

Strategic Allocation: A1 Innsworth			
	<b>Sustainability Objective</b>	<b>Assessment of Effects</b>	
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making	
		<b>Description:</b> 1300 dwellings; E=approx. 9 ha; new local centre, school, GI network in FZ 2&3, new junction to A40	
		<b>Initial SA Summary Report (2011) Ref.:</b> part of original broad location G1-Land North of Gloucester	
		<b>2104 SA:</b> H=55.7 ha,1250 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities	
		The area is not in or adjacent to any landscape designations and is described as suburban <sup>9</sup> and being in an area of medium - low sensitivity landscape <sup>10</sup> . Therefore, the effects of the development are unlikely to be significant and the landscape could be replaced or substituted – or improved. The implementation and effectiveness of mitigation measures and potential enhancement is more certain with the reinstatement of site specific requirements in Policy SA 1 (and other Core Policies together with clear planning briefs and masterplanning), including requirements for layout that respects landscape character & separation of Longford, integrates important hedgerows, and reduces the impact of electricity pylons & high voltage lines.	
<b>6</b>	<b>NATURAL ENVIRONMENT AND RESOURCES: USE</b>	There will be loss of soils (lime-rich loamy and clayey soils with impeded drainage) but the land is not classified <sup>11</sup> as important agricultural land (grade 2 and 3) and such loss is of minor significance.  As mentioned previously, the site lies within a drinking water protected area which is identified as being 'probably at risk.' <sup>12</sup> Development could have minor negative effects on water use through	<b>O?</b>

<sup>9</sup> Defra (2014) Magic – Landscape <http://magic.defra.gov.uk> [accessed March 2014]

<sup>10</sup> Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (2013) Joint Core Strategy Landscape Characterisation Assessment and Sensitivity Analysis

<sup>11</sup> Defra (2014) Magic – Agricultural Land Classification <http://magic.defra.gov.uk>

<sup>12</sup> Environment Agency (2014) Flood Maps Online at <http://maps.environment-agency.gov.uk>

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Strategic Allocation: A1 Innsworth					
Sustainability Objective		Assessment of Effects			
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
Minimise the use of natural resources including soil, water and Greenfield land through good design		<p><b>Description:</b> 1300 dwellings; E=approx. 9 ha; new local centre, school, GI network in FZ 2&amp;3, new junction to A40</p> <p><b>Initial SA Summary Report (2011) Ref.:</b> part of original broad location G1-Land North of Gloucester</p> <p><b>2104 SA:</b> H=55.7 ha, 1250 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities</p>			
		<p>potential for increased demand from new residential and community facilities. However, this is mitigated by Policy SD4.</p> <p>The effects on the use of natural resources will depend upon the design and construction methods to be used at the development management level. The scale of the urban extension approach will facilitate opportunities for water recycling with minor positive effects for water use – effectiveness depends upon details of planning brief and masterplanning.</p> <p>The strategic site is situated on Greenfield land in the Green Belt but is considered to contribute less than other areas as identified in the Greed Belt Review<sup>13</sup>. Therefore, the potential major negative effects on setting are less, the proposed GI will act as a landscape buffer; uncertainty as depends upon details of planning brief and masterplanning.</p>			
<b>7</b>	<b>HISTORIC ENVIRONMENT</b>	<p>Gloucester has a rich, important and distinctive historic heritage and environment. There are no conservation areas, listed buildings or scheduled monuments on or adjacent to the allocation site<sup>14</sup>. In addition, protection for the historic environment is provided in the wording of Policy SD9; thus effects are likely to be neutral.</p> <p>However, the potential for archaeology is unknown at this stage and there currently is no policy to provide protection/ mitigation against direct effects on archaeological assets. In the absence of a protection policy, the effects therefore are considered to be uncertain.</p>	<table border="1"> <tr> <td style="background-color: #0070C0; color: white; text-align: center;">○</td> <td style="text-align: center;">?</td> </tr> </table>	○	?
○	?				
	Protect and enhance the area's distinctive historic environment				

<sup>13</sup> Green Belt Review (2011) <http://www.gct-ics.org/Documents/EvidenceBase/JCSGBReviewFinalSept2011.pdf> (accessed March 2014)

<sup>14</sup> English Heritage (2014) National Heritage List for England. Online at <http://list.english-heritage.org.uk/mapsearch.aspx> [accessed March 2014]

Strategic Allocation: A1 Innsworth				
Sustainability Objective		Assessment of Effects		
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making		
		Description: 1300 dwellings; E=approx. 9 ha; new local centre, school, GI network in FZ 2&3, new junction to A40		
Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester		2104 SA: H=55.7 ha,1250 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities		
<b>8</b>	<b>SUSTAINABLE TRANSPORT</b>  Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	The potential allocation has a network of footpaths which could be enhanced as part of an overall sustainable transport plan for the site. These paths could provide good linkages to, and improvements to, existing public transport facilities on the A38 and A40 for commuting into the city thus reducing the need to travel by high carbon modes of transport. This should be secured through Policies SD5, INF1 and INF2 which require passenger transport links, safe and convenient pedestrian and cycle routes within and adjoining the development.  The urban extension here provides good opportunities to link from the rest of the city and to the wider countryside.  Given the size of the allocation and although there are no known traffic and transport issues, it is likely that there could both short-term (during construction) and long-term negative effects on the existing road network with potential for congestion. However, mitigation is provided in Policy INF2.  The implementation and effectiveness of mitigation measures and potential enhancement is more certain with the reinstatement of site specific requirements in Policy SA 1 (and other Core Policies together with clear planning briefs and masterplanning), including requirements for new junction onto A40, mitigation of traffic impact, high quality public transport, and safe, easy pedestrian & cycle links.		++ ?
<b>9</b>	<b>WASTE AND POLLUTION</b>	Given the scale of development proposed there are likely to be negative effects as large amounts of waste will be created in the short-term during construction and in the long-term by additional		-

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Strategic Allocation: A1 Innsworth			
Sustainability Objective		Assessment of Effects	
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making	
		<b>Description:</b> 1300 dwellings; E=approx. 9 ha; new local centre, school, GI network in FZ 2&3, new junction to A40	
		<b>Initial SA Summary Report (2011) Ref.:</b> part of original broad location G1-Land North of Gloucester <b>2104 SA:</b> H=55.7 ha, 1250 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities	
	Minimise pollution and waste to landfill	households and businesses generating waste day to day. Mitigation has been put in place in the long-term only through the requirement to submit a waste minimisation statement under Policy SD4.  Air, light and noise pollution are likely to increase – particularly during the construction phases in the shorter term. This may affect the residential areas to the South East and East of the proposed strategic site. Mitigation is provided by Policy SD15.	
10	<b>THE ECONOMY</b>  Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	The provision of 9.1 ha of employment land, especially in a location close to good access, transport, housing and close proximity to existing/proposed employment areas, will have major positive effects on objectives for economic sustainability.	++
11	<b>CITY AND TOWN CENTRES</b>	The urban extension approach with a strategic site providing both housing and employment land at the edge of the city (within 3.2 km) with good transport into the centre will support the vitality and viability of the city centre with major positive effects.	++

**Strategic Allocation: A1 Innsworth**

		<b>Assessment of Effects</b>	
<b>Sustainability Objective</b>		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making	
		<b>Description:</b> 1300 dwellings; E=approx. 9 ha; new local centre, school, GI network in FZ 2&3, new junction to A40	
		<b>Initial SA Summary Report (2011) Ref.:</b> part of original broad location G1-Land North of Gloucester <b>2104 SA:</b> H=55.7 ha,1250 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities	
228	Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations		
12	<b>SUSTAINABLE COMMUNITIES: EQUALITY</b> Reduce inequalities in wellbeing and opportunity	The allocation could reduce inequalities in wellbeing and opportunity through providing good quality housing, employment opportunities and an improved transport network to create better access to facilities and services for all – effectiveness depends upon details of masterplanning (and see SA Objective numbers 8 Transport 14 Health and 15 Housing). The urban extension approach provides a scale at which high quality design and accessibility for all should be more deliverable and certain.	++
13	<b>SUSTAINABLE COMMUNITIES: SAFETY</b> Reduce crime and the fear of crime	The allocation could provide an opportunity to reduce crime as employment land is to be made available for development which could provide additional jobs and good quality housing. This will provide attractive places to live and work which people will want to look after and where people will feel safe. Policy SD5 requires, where appropriate, that new development should demonstrate how a design principle relating to safety and security has been incorporated which is likely to lead to minor positive effects.	+

Strategic Allocation: A1 Innsworth				
Sustainability Objective		Assessment of Effects		
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making		
		<b>Description:</b> 1300 dwellings; E=approx. 9 ha; new local centre, school, GI network in FZ 2&3, new junction to A40		
		<b>Initial SA Summary Report (2011) Ref.:</b> part of original broad location G1-Land North of Gloucester <b>2104 SA:</b> H=55.7 ha,1250 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities		
229	14	<p><b>HEALTH</b></p> <p>Improve access to health facilities and promote healthy</p>	<p>The opportunities for improved accessibility to green space as part of wider GI network, including footpaths and the Gloucestershire Way, long distance path, will have positive effects on health.</p> <p>The allocation also includes extra care facilities leading to long-term positive effects on health.</p> <p>The potential site includes local primary school and children's centre; sustainability could be enhanced if such facilities could provide other uses, especially for older children/young adults in the evening, and/or local doctor/nurse attendance.</p> <p>The site is not within walking of health care facilities although in the wording of Policy INF5 there is a requirement for the provision of contributions for local infrastructure including facilities and services. Despite local health facilities not being specified, it is assumed that this is a consideration.</p> <p>In addition, Policy SD15 requires a proposal for development at this site must be accompanied by a Health Impact Assessment.</p>	++
	15	<p><b>HOUSING</b></p> <p>Ensure everyone has access to a decent home that they can afford and meets their needs</p>	<p>Major positive effects for contributing to the locally identified need for housing, including affordable housing. The scale of the allocation should enable a good range of type and tenure with flexibility for changing needs over time with long term cumulative positive effects – details depend on planning brief and masterplanning.</p> <p>Policies SD11, SD4, SD12, SD13 and SD5 will ensure that that new housing provides the right mix and type, a contribution to affordable housing, and also the development of high quality sustainable homes. This will have major long-term positive effects on housing.</p>	++

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Strategic Allocation: A1 Innsworth			
Sustainability Objective		Assessment of Effects	
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making	
		Description: 1300 dwellings; E=approx. 9 ha; new local centre, school, GI network in FZ 2&3, new junction to A40	
		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester	
		2104 SA: H=55.7 ha, 1250 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities	
16	<b>GREEN SPACE</b>  Create, enhance, protect, connect and improve access to open spaces	There are 5 footpaths crossing the potential site and linking to the Gloucestershire Way, a long distance route between Tewkesbury and Chepstow. Accessibility will be enhanced through the improvement to the GI network – if implemented through Policy INF4. The potential site includes possibilities for enhancing access from the existing housing to the SE.	++
17	<b>EDUCATION AND SKILLS</b>  Improve access to education and life-long learning and enhance skills	The urban extension approach with easy accessibility from the edge to the city centre will support existing educational services. Provision of a primary school is a requirement of the proposals so there will be no adverse effects through overloading capacity of existing schools.	++
18	<b>CULTURE AND TOURISM</b>  Protect and enhance cultural heritage and promote tourism	There are no cultural heritage or tourism assets on or adjacent to the site that are likely to be affected, so the effects are likely to be neutral.	0



**Strategic Allocation: A1 Innsworth**

**Sustainability Objective**

**Assessment of Effects**

Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making

**Description:** 1300 dwellings; E=approx. 9 ha; new local centre, school, GI network in FZ 2&3, new junction to A40

**Initial SA Summary Report (2011) Ref.:** part of original broad location G1-Land North of Gloucester  
**2104 SA:** H=55.7 ha, 1250 dwellings; E= 9.1 ha; new junction from A40; new primary school and children's centre; new local centre with community facilities

**Summary of Key Negative and Positive Effects for Sustainable Development:**

The allocation is located on a parcel of Land to the north of the City of Gloucester, adjacent to Innsworth. The allocation supports the SA objectives of Climate change adaptation and Transport, with uncertainty of effects on Historic environment and Sustainable communities – safety. There is potential for minor negative effects on the SA objectives of Resources – use and quality and Waste and pollution, given the location of the option on Greenfield land in the green belt, being located in a groundwater drinking water protected area and the scale of the development proposed.

**Key Negative Effects:**

- No significant negative environmental effects have been identified.

**Key Positive Effects:**

- The allocation is likely to lead to significant positive environmental effects on the following SA objectives: Biodiversity; Flooding; The Economy; City and town centres; Sustainable communities - equality and wellbeing; Health; Housing; Green Space; and Education and skills.

**Mitigation, Recommendations and Residual Effects for Plan-making**

- None.

Potential Strategic Allocation: Land at Mitton			
Sustainability Objective		Assessment of Effects	
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
		Description: 500 dwellings (Phase 1)	
		Initial SA Summary Report (2011) Ref.: part of original broad location sub area T1 – Land at Mitton 2014 SA: 126.6 ha of housing	
1	<p><b>BIODIVERSITY</b></p> <p>Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats</p>	<p>There are no international, national or local nature conservation designations on or adjacent to the allocation site which could be directly affected<sup>15</sup>. The site is predominantly arable with a small areas of deciduous woodland priority habitat at the north <sup>16</sup>. The Carrant Brook runs north to south near the eastern edge of the site which could house some riparian habitat and species.</p> <p>Mitigation and enhancements to reduce any negative effects and improve the existing habitats or create new ones are required. This expected to have major positive effects given the current biodiversity value of the site.</p> <p>The presence of protected species is not known at this stage. It is recommended that surveys are carried out at the development management level to establish presence/absence and then, if present, appropriate mitigation should be put in place to reduce any short/ long term negative effects on and provide enhancement for protected species.</p> <p>Mitigation could be provided by site specific requirements in Policy SA1 and this would help ensure implementation and removal of any uncertainty.</p>	++
2	<p><b>CLIMATE CHANGE MITIGATION</b></p>		+

<sup>15</sup> Defra (2013) Magic – Statutory Rural Designations. Online at <http://magic.defra.gov.uk> [accessed September 2013].

<sup>16</sup> Defra (2013) Magic – Statutory Rural Designations. Online at <http://magic.defra.gov.uk> [accessed September 2013].

Potential Strategic Allocation: Land at Mitton			
Sustainability Objective		Assessment of Effects	
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
Reduce contribution to climate change and support households and businesses in reducing their carbon footprint		<b>Description:</b> 500 dwellings (Phase 1)	
		<b>Initial SA Summary Report (2011) Ref.:</b> part of original broad location sub area T1 – Land at Mitton <b>2014 SA:</b> 126.6 ha of housing	
3 <b>CLIMATE CHANGE ADAPTATION</b>  Adapt to the consequences of climate change		There is potential to reduce contribution to climate change on the site through compliance with Policies SD4, SD5 and INF4. This is likely to lead to minor positive effects in the long-term on climate change mitigation.  The effects also depend upon implementation and details of other policies. Overall, the urban extension approach will better promote possibilities for delivery of climate change mitigation.	
		The requirements reducing flood risk under Policy INF3 will contribute to positive effects for climate change adaptation (and see SA Objective No. 4 Flooding following).  The scale of urban extension developments offers more possibilities for delivery of resilience and SUDS.  Climate change adaption measures are required by Policy SD4 and as a result, the effects on climate change adaptation are expected to be minor positive Flooding is considered separately under SA Objective No. 4.	+
4 <b>FLOODING</b>		The Carrant Brook runs to north to south along the eastern part of the site and around the Brooks' borders it has been identified as an area of medium to high flood risk <sup>17</sup> . This accounts for approximately 30% of the site and development on this flood risk area would lead to major	++

<sup>17</sup> Environment Agency (2013) Flood Maps – Risk of Flooding from Rivers and Sea. Online at ([http://: maps.environment-agency.gov.uk](http://maps.environment-agency.gov.uk) [accessed September 2013])

**Potential Strategic Allocation: Land at Mitton**

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Potential Strategic Allocation: Land at Mitton	
<b>Sustainability Objective</b>	<b>Assessment of Effects</b>
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty
	<b>Description:</b> 500 dwellings (Phase 1)
	<b>Initial SA Summary Report (2011) Ref.:</b> part of original broad location sub area T1 – Land at Mitton <b>2014 SA:</b> 126.6 ha of housing
Manage and reduce flood risk and surface water run-off	negative effects. The major negative effects could be prevented if potential development avoided the areas of flood risk and implemented sustainable drainage, and all according to site specific requirements in Policy SA1. It is understood that developer proposals include such mitigation and enhancement measures such that there are overall major positive effects indicated.  In addition, there is potential for long-term negative effects on surface water due to the imposition of impermeable surfaces which could lead to an increase in surface water run-off and therefore surface water flooding. To reduce potential negative effects on surface water run-off mitigation could be provided by site specific requirements in Policy SA1. As a result, it is considered that effects on surface water flooding will be neutral.
<b>5</b> <b>NATURAL ENVIRONMENT AND RESOURCES: QUALITY</b>  Protect and improve the quality of natural resources including soil, water and landscape	All of the site falls within a surface water nitrate vulnerable zone meaning that it is particularly sensitive to water pollution. In addition, the south of the site is located on a minor aquifer which is considered to be of high vulnerability. As mentioned in SA objective No. 4, the Carrant Brook runs to the south of the site and could be a potential receptor for contaminants from surface water run-off generated by the impermeable surfaces of any development. Development could have minor negative effects on groundwater quality from contaminated run-off particularly during construction. Further mitigation to protect water quality at the development management level in line with that provided by Policies INF3, SD15 and SD4 may be required through site specific requirements. If implemented, neutral effects on water and soil are indicated.

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Potential Strategic Allocation: Land at Mitton							
Sustainability Objective		Assessment of Effects					
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty					
		Description: 500 dwellings (Phase 1)					
		Initial SA Summary Report (2011) Ref.: part of original broad location sub area T1 – Land at Mitton 2014 SA: 126.6 ha of housing					
		The area is not in or adjacent to any landscape designations and there is industrial development to the south-east. The site is considered to be in an area of medium sensitivity landscape <sup>18</sup> . Therefore, the effects of the development are unlikely to be significant and the landscape could be replaced or substituted – or improved. Mitigation could be provided by site specific requirements in Policy SA1, including provision of Green Infrastructure which will again help screen the development from the surrounding area and also help it to blend into the surrounding landscape, and use of existing field boundaries where practical to try and maintain existing landscape features. With implementation of such mitigation and enhancement measures, minor positive effects are indicated for landscape.					
6	<b>NATURAL ENVIRONMENT AND RESOURCES: USE</b>  Minimise the use of natural resources including soil, water and Greenfield land through good design	<p>The effects on the use of natural resources will depend upon the design and construction methods to be used at the development management level. The site is located on Greenfield land which is currently used for agricultural purposes and as a result it does not support this SA objective. However, Policy SD4 and other Core Policies provide mitigation; site specific requirements, such as provision of a fragmented development edge and integration of landscape buffers with GI will mitigate and should reduce negative effects to neutral.</p> <p>With regard to soils, the development will lead to the loss of soil as a direct result of development. The south of the site contains grade 3 and 3a agricultural land which is considered to be of good to moderate quality and therefore development of the south would lead to minor negative long-term effects.</p>	<table border="1"> <tr> <td style="background-color: #0070C0; color: white; text-align: center;">O</td> <td style="background-color: #FFD700; text-align: center;">-</td> </tr> <tr> <td style="background-color: #0070C0; color: white; text-align: center;">?</td> <td style="background-color: #FFD700; text-align: center;">-</td> </tr> </table>	O	-	?	-
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<sup>18</sup> Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (2013) Joint Core Strategy Landscape Characterisation Assessment and Sensitivity Analysis (Draft).

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Potential Strategic Allocation: Land at Mitton			
Sustainability Objective	Assessment of Effects		
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		
	<b>Description:</b> 500 dwellings (Phase 1)		
	<b>Initial SA Summary Report (2011) Ref.:</b> part of original broad location sub area T1 – Land at Mitton <b>2014 SA:</b> 126.6 ha of housing		
		<p>Development could have minor negative effects on water use through potential for increased demand from new housing. However, this is mitigated by Policy SD4.</p> <p>The effects on the use of natural resources will depend upon the design and construction methods to be used at the development management level. The scale of the urban extension approach will facilitate opportunities for water recycling with minor positive effects for water use – effectiveness depends upon details of planning brief and masterplanning.</p>	
7	<p><b>HISTORIC ENVIRONMENT</b></p> <p>Protect and enhance the area's distinctive historic environment</p>	<p>There are no conservation areas, scheduled monuments on or adjacent to the site<sup>19</sup>. There is a listed building (Mitton Lodge – grade II listed) located on the western edge of the site and this could be directly affected by the development. Also, Mitton Farmhouse another Grade II listed building is in close proximity.</p> <p>Protection for the historic environment is provided in the wording of Policy SD9. Further mitigation could be provided by site specific requirements in Policy SA1. Therefore, the effects are expected to be neutral.</p> <p>The site is located in the area of Bredon Hill and the Carrant Valley which is 'probably the wealthiest site in Gloucestershire for archaeology'<sup>20</sup> and the scale of the allocation is of a</p>	<p>○ ?</p>

<sup>19</sup> English Heritage (2013) National Heritage List for England. Online at <http://list.english-heritage.org.uk/mapsearch.aspx> [accessed September 2013]

<sup>20</sup> Worcestershire County Council (2012) Archaeology of Bredon and Carrant Valley Homepage. Online at <http://www.worcestershire.gov.uk/cms/archaeology/education-and-outreach/unlocking-the-past/e-gallery/bredon-hill-carrant-valley.aspx>

**Potential Strategic Allocation: Land at Mitton**

		<b>Potential Strategic Allocation: Land at Mitton</b>	
<b>Sustainability Objective</b>		<b>Assessment of Effects</b>	
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
		<b>Description:</b> 500 dwellings (Phase 1)	
		<b>Initial SA Summary Report (2011) Ref.:</b> part of original broad location sub area T1 – Land at Mitton <b>2014 SA:</b> 126.6 ha of housing	
		sufficiently large size which could pose a risk to buried archaeological deposits. In the absence of a protection policy, the effects therefore are considered to be uncertain.	
<b>8</b>	<b>SUSTAINABLE TRANSPORT</b>  Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car	<p>The site is adjacent to the B4080 and there are limited opportunities for pedestrians to access facilities nearby. There is only one bus stop located approximately 120 m from the northern part of the site which would offer access to Tewkesbury's centre. However, mitigation could be provided through site specific requirements in Policy SA1 such as requiring maximisation of opportunities for sustainable travel and increasing non car use and other transport and infrastructure improvements. This could lead to major long-term positive effects. Also within the policy wording, provision of transport measures including sustainable transport, improved network, pedestrian access and cycle routes are explicit which should lead to long-term positive effects.</p> <p>Given the size of the site, it is likely that there could both short-term (during construction) and long-term negative effects on the existing road network with potential for congestion. However, mitigation would be provided through provision of a Transport Assessment which should make clear how cycleways and footpaths can be integrated into the existing network to help avoid conflict of users and promote sustainable travel. It is considered that the effects will be neutral.</p> <p>Overall, some uncertainty until details of masterplanning available.</p>	<b>++?</b>

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Potential Strategic Allocation: Land at Mitton			
Sustainability Objective		Assessment of Effects	
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
		<b>Description:</b> 500 dwellings (Phase 1)	
		<b>Initial SA Summary Report (2011) Ref.:</b> part of original broad location sub area T1 – Land at Mitton <b>2014 SA:</b> 126.6 ha of housing	
238	9	<p><b>WASTE AND POLLUTION</b></p> <p>Minimise pollution and waste to landfill</p> <p>The majority of the allocation site is located on Greenfield agricultural land and therefore it is considered that there is limited potential for contamination to be present. There is a requirement under D Environment for the developer to investigate and mitigate any contamination within the site through agreed remediation techniques which should reduce any negative effects.</p> <p>In terms of waste, given the scale of development proposed there are likely to be negative effects as large amounts of waste will be created in the short-term during construction and in the long-term by the additional housing generating waste day to day. Mitigation has been put in place through the requirement to submit a waste management plan to include provision of space for storage of recycling facilities per dwelling with the planning application under E General.</p> <p>Furthermore, there could be both short-term (during construction) and long-term negative effects on the air pollution as a result of an increase in traffic and the potential to generate dust during construction. Mitigation is offered to reduce traffic as outlined under SA Objective 8.</p> <p>There is the potential for development at this site to have a negative effect on pollution through increased levels of traffic and therefore atmospheric pollution. Tewkesbury High Street is designated as an AQMA for nitrogen dioxide. Development at this site will increase the level of traffic along the high street and therefore the levels of atmospheric pollution within the AQMA.</p> <p>The effects on waste and pollution at this stage are considered to be minor negative at this stage given the need for further mitigation to be developed to reduce negative effects of noise, air quality and construction waste in the short-term.</p>	-



Potential Strategic Allocation: Land at Mitton				
Sustainability Objective		Assessment of Effects		
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		
		Description: 500 dwellings (Phase 1)		
		Initial SA Summary Report (2011) Ref.: part of original broad location sub area T1 – Land at Mitton 2014 SA: 126.6 ha of housing		
239	10	<p><b>THE ECONOMY</b></p> <p>Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses</p>	<p>It is not known at this stage whether development of this site would include employment &amp; therefore the effects are uncertain.</p>	?
	11	<p><b>CITY AND TOWN CENTRES</b></p> <p>Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations</p>	<p>The southern tip of the site is located approximately 1.3 km from Tewkesbury's centre and the northern tip is near 3 km away. The closest bus stop to provide access to Tewkesbury's centre is approximately 120 m from the northern edge of the site. It is unclear how the site could support the vitality and viability of Tewkesbury's centre and uncertainty in the long-term.</p> <p>However, it is understood that the developer's Supporting Transport Statement reports that the site is within the acceptable standard for cycling distances of 5km. The implementation and effectiveness of mitigation measures and potential enhancement would be more certain with the reinstatement of site specific requirements in Policy SA1 (and other Core Policies together with clear planning briefs and masterplanning), including requirements for sustainable transport, and then minor positive effects are indicated.</p>	+

**Potential Strategic Allocation: Land at Mitton**

		<b>Assessment of Effects</b>		
<b>Sustainability Objective</b>		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty		
		<b>Description:</b> 500 dwellings (Phase 1)		
		<b>Initial SA Summary Report (2011) Ref.:</b> part of original broad location sub area T1 – Land at Mitton <b>2014 SA:</b> 126.6 ha of housing		
240	<b>12</b>	<b>SUSTAINABLE COMMUNITIES: EQUALITY</b> Reduce inequalities in wellbeing and opportunity	The site could reduce inequalities in wellbeing and opportunity if it provides good quality housing and an improved transport network to create better access to facilities and services for all – effectiveness depends upon details of masterplanning (and see SA Objective Numbers 8 Transport 14 Health and 15 Housing). It is anticipated that development of the site will lead to minor positive effects on this SA Objective.	+
	<b>13</b>	<b>SUSTAINABLE COMMUNITIES: SAFETY</b> Reduce crime and the fear of crime	The site could provide an opportunity to reduce crime as good quality housing and employment facilities can create attractive places to live and work which people would like to care for and where people can feel safe. At present, the effects are considered to be uncertain and may depend on design and layout details at the development management level.	?
	<b>14</b>	<b>HEALTH</b> Improve access to health facilities and promote healthy	Requirements for provision with improvements for accessibility to open and green space as part of a wider GI network, including footpaths and cycleways (see SA Objective No. 7). This will have positive effects on health with minor positive long term effects if implemented successfully. This will depend in part on ensuring that GI is provided as part of development and includes provision for long term management.	+

Potential Strategic Allocation: Land at Mitton			
Sustainability Objective		Assessment of Effects	
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
		Description: 500 dwellings (Phase 1)	
		Initial SA Summary Report (2011) Ref.: part of original broad location sub area T1 – Land at Mitton 2014 SA: 126.6 ha of housing	
15	<b>HOUSING</b>	The site could provide for a large number of new homes including affordable housing. This will have major long-term positive effects on housing for contributing to the locally identified need for housing.	++
	Ensure everyone has access to a decent home that they can afford and meets their needs		
16	<b>GREEN SPACE</b>	The site is Greenfield land which is currently used for agricultural purposes. Its development will ultimately remove this green space constituting a long-term minor negative effect on green space. Mitigation could be provided in site specific requirements in Policy SA1 that further enhancement is carried out to existing space, that landscaping and structural planting is carried out throughout the development, and that green infrastructure is implemented through the site. This should reduce negative effects and could lead to minor positive effects on green space.	+?
	Create, enhance, protect, connect and improve access to open spaces		
17	<b>EDUCATION AND SKILLS</b>	Access to education facilities is relatively poor with the majority of the site being located over 2 km from the nearest school. It is uncertain at this stage whether additional educational facilities would be provided on site in the longer term and as a result any development is considered to lead to minor negative effects.	-?
	Improve access to education and life-long learning and enhance skills		
18	<b>CULTURE AND TOURISM</b>	Given the nature of the allocation, effects of this SA Objective are considered to be neutral.	○

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**Potential Strategic Allocation: Land at Mitton**

Potential Strategic Allocation: Land at Mitton	
<b>Sustainability Objective</b>  Protect and enhance cultural heritage and promote tourism	<b>Assessment of Effects</b>  Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty
	<b>Description:</b> 500 dwellings (Phase 1)
	<b>Initial SA Summary Report (2011) Ref.:</b> part of original broad location sub area T1 – Land at Mitton <b>2014 SA:</b> 126.6 ha of housing
<p><b>Summary of Key Negative and Positive Effects for Sustainable Development:</b>                      The site is located on a parcel of land to the North of Tewkesbury and is by the M5 to the East. Development of the site would support the SA objectives of: Climate Change Adaptation and Mitigation; Transport; Sustainable Communities – equalities; Health; and Green Space with uncertainty of effects on: Historic Environment; Economy; and Sustainable Communities – safety. There is potential for minor negative effects on the SA objective of: Education and Skills; City and Town Centres; Waste and Pollution; soils (loss of moderate to good quality agricultural land); and on water quality.</p> <p><b>Key Negative Effects:</b></p> <ul style="list-style-type: none"> <li>▪ Development of the site is likely to lead to major negative on flooding given that 30% is located in an area of medium to high risk flooding but this can be mitigated through avoidance.</li> </ul> <p><b>Key Positive Effects:</b></p> <ul style="list-style-type: none"> <li>▪ The allocation is likely to lead to significant positive environmental effects on the SA objectives of Biodiversity and Housing.</li> </ul> <p><b>Mitigation, Recommendations and Residual Effects for Plan-making</b></p> <ul style="list-style-type: none"> <li>▪ It would be recommended that the area identified as being at risk of flooding should be excluded from any development. This would prevent any major negative effects identified on Flooding.</li> <li>▪ Given the site has poor access to existing educational facilities; it would be recommended that additional facilities are provided on site if possible. This would result in minor positive residual effects on Education and Skills.</li> </ul>	

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## Twigworth

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Potential Strategic Allocation: Twigworth (includes potential safeguarded land)			
Sustainability Objective	Assessment of Effects		
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making		
	Description: 1600 dwellings; GI network in FZ 3; new school & community facilities?		
Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester 2014 SA: 2084 dwellings;			
1	<p><b>BIODIVERSITY</b></p> <p>Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats</p>	<p>There are no internationally protected habitats<sup>21</sup> on or adjacent to the site although there is one nationally protected area Innsworth Meadow – as a SSSI and Priority BAP<sup>22</sup> Habitat for lowland meadow (condition - recovering favourable). Therefore, no significant negative effects on protected biodiversity. There is some 40-50% overlap by area with this meadowland in the NW corner of the proposed housing with potential negative effects but also potential positive effects if the meadowland could be improved as part of the masterplanning.</p> <p>There are no LNRs in the area (see SA Objective No 16 Green Space). There are possibilities for very positive effects by enhancing the protected lowland meadow with improved connectivity to a wider managed floodplain habitat –both in the short and longer terms. Limited potential for new GI along the Hatherley Brook in the SW corner to be actively managed for biodiversity purposes in line with Policy INF4 will have minor positive effects.</p>	+

<sup>21</sup> Defra (2014) Magic – Statutory Rural Designations - <http://magic.defra.gov.uk>

<sup>22</sup> Gloucestershire County Council Biodiversity Delivery Plan - <http://www.gloucestershirebap.org.uk>

<b>Potential Strategic Allocation: Twigworth (includes potential safeguarded land)</b>			
	<b>Sustainability Objective</b>	<b>Assessment of Effects</b>	
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making	
		<b>Description:</b> 1600 dwellings; GI network in FZ 3; new school & community facilities?	
		<b>Initial SA Summary Report (2011) Ref.:</b> part of original broad location G1-Land North of Gloucester <b>2014 SA:</b> 2084 dwellings;	
		<p>The implementation and effectiveness of mitigation measures and potential enhancement would be more certain with the reinstatement of site specific requirements in Policy SA 1 (and other Core Policies together with clear planning briefs and masterplanning), including new GI.</p> <p>The presence of protected species is unknown at this stage and there could be potential for the allocation to directly destroy habitat or indirectly cause pollution/ disturbance. Mitigation is provided in the wording of SD10 &amp; site specific requirements in SA1.</p>	
<b>2</b>	<b>CLIMATE CHANGE MITIGATION</b>	<p>There is potential to reduce contribution to climate change on the site through compliance with Policies SD4, SD5 and INF4. This is likely to lead to minor positive effects in the long-term on climate change mitigation.</p> <p>The effects also depend upon implementation and details of other policies. Overall, the urban extension approach will better promote possibilities for delivery of climate change mitigation.</p>	<b>+</b>
	Reduce contribution to climate change and support households and businesses in reducing their carbon footprint		
<b>3</b>	<b>CLIMATE CHANGE ADAPTATION</b>	<p>The requirements reducing flood risk under Policy INF3 will contribute to positive effects for climate change adaptation (and see SA Objective No. 4 Flooding following).</p> <p>The scale of urban extension developments offers more possibilities for delivery of resilience and SUDS.</p>	<b>+</b>
	Adapt to the consequences of climate change		

Potential Strategic Allocation: Twigworth (includes potential safeguarded land)			
Sustainability Objective		Assessment of Effects	
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making	
		<b>Description:</b> 1600 dwellings; GI network in FZ 3; new school & community facilities?	
		<b>Initial SA Summary Report (2011) Ref.:</b> part of original broad location G1-Land North of Gloucester <b>2014 SA:</b> 2084 dwellings;	
		Climate change adaption measures are required by Policy SD4 and as a result, the effects on climate change adaptation are expected to be minor positive.	
<b>4</b>	<b>FLOODING</b>  Manage and reduce flood risk and surface water run-off	The Hatherley Brook is subject to flooding (Zone 3) <sup>23</sup> . The strategic site allocation proposes development outside the small part of flood zone 3 to the south west, and GI in the flood zones thus reducing flood risk. The requirement for flood storage betterment across the site as recommended in SFRA2 <sup>24</sup> to improve the capacity of the floodplain upstream of Longford will have wider positive effects for flood risk management.  Policy INF3 and this will have positive effects in short to long-term.	++
<b>5</b>	<b>NATURAL ENVIRONMENT AND RESOURCES: QUALITY</b>  Protect and improve the quality of natural resources including soil, water and landscape	The site lies within a drinking water protected area which is identified as being 'probably at risk' and lies on a minor aquifer which is considered to be of high vulnerability. <sup>25</sup> Development could have minor negative effects on groundwater quality from contaminated run-off particularly during construction. Further mitigation to protect water quality at the development management level in line with that provided by Policies INF3, SD15 and SD4 may be required.	○

<sup>23</sup> Environment Agency (2014) Flood Maps. Online at (maps.environment-agency.gov.uk)

<sup>24</sup> Halcrow Group Ltd (July 2012) Gloucester, Cheltenham & Tewkesbury Joint Core Strategy. Strategic Flood Risk Assessment for Local Development Framework Level 2. Online at <http://www.gct-jcs.org/EvidenceBase/StrategicFloodRiskAssessment.aspx> [Accessed March 2014]

<sup>25</sup> Environment Agency (2014) Flood Maps – Risk of Flooding from Rivers and Sea. Online at (maps.environment-agency.gov.uk)

Potential Strategic Allocation: Twigworth (includes potential safeguarded land)			
Sustainability Objective	<p align="center"><b>Assessment of Effects</b></p> <p>Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making</p>		
	<p><b>Description:</b> 1600 dwellings; GI network in FZ 3; new school &amp; community facilities?</p>		
	<p><b>Initial SA Summary Report (2011) Ref.:</b> part of original broad location G1-Land North of Gloucester <b>2014 SA:</b> 2084 dwellings;</p>		
		<p>The area is not in or adjacent to any landscape designations and is described as suburban<sup>26</sup> and being in an area of medium - low sensitivity landscape<sup>27</sup>. Therefore, the effects of the development are unlikely to be significant and the landscape could be replaced or substituted – or improved. The implementation and effectiveness of mitigation measures and potential enhancement would be more certain with the reinstatement of site specific requirements in Policy SA1 (and other Core Policies together with clear planning briefs and masterplanning), including requirements for layout that respects landscape character &amp; separation of Longford, integrates important hedgerows, and reduces the impact of electricity pylons &amp; high voltage lines in small corner of western part of site.</p>	
<b>6</b>	<b>NATURAL ENVIRONMENT AND RESOURCES: USE</b>	<p>There will be loss of soils (lime-rich loamy and clayey soils with impeded drainage) but the land is not classified<sup>28</sup> as important agricultural land (grade 2 and 3) and such loss is of minor significance.</p> <p>As mentioned previously, the site lies within a drinking water protected area which is identified as being 'probably at risk.'<sup>29</sup> Development could have minor negative effects on water use through</p>	<b>O?</b>

<sup>26</sup> Defra (2014) Magic – Landscape <http://magic.defra.gov.uk> [accessed March 2014]

<sup>27</sup> Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (2013) Joint Core Strategy Landscape Characterisation Assessment and Sensitivity Analysis

<sup>28</sup> Defra (2014) Magic – Agricultural Land Classification <http://magic.defra.gov.uk>

<sup>29</sup> Environment Agency (2014) Flood Maps Online at <http://maps.environment-agency.gov.uk>



Potential Strategic Allocation: Twigworth (includes potential safeguarded land)				
<b>Sustainability Objective</b>	<b>Assessment of Effects</b>			
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making			
	<b>Description:</b> 1600 dwellings; GI network in FZ 3; new school & community facilities?			
<b>Initial SA Summary Report (2011) Ref.:</b> part of original broad location G1-Land North of Gloucester <b>2014 SA:</b> 2084 dwellings;				
Minimise the use of natural resources including soil, water and Greenfield land through good design	<p>potential for increased demand from new residential and community facilities. However, this is mitigated by Policy SD4.</p> <p>The effects on the use of natural resources will depend upon the design and construction methods to be used at the development management level. The scale of the urban extension approach will facilitate opportunities for water recycling with minor positive effects for water use – effectiveness depends upon details of planning brief and masterplanning.</p> <p>The strategic site is situated on Greenfield land in the Green Belt but is considered to contribute less than other areas as identified in the Greed Belt Review<sup>30</sup>. Therefore, the potential major negative effects on setting are less, the proposed GI will act as a landscape buffer; uncertainty as depends upon details of planning brief and masterplanning.</p>			
<b>7 HISTORIC ENVIRONMENT</b>	<p>Gloucester has a rich, important and distinctive historic heritage and environment. There are no conservation areas, listed buildings or scheduled monuments on or adjacent to the allocation site<sup>31</sup>. In addition, protection for the historic environment is provided in the wording of Policy SD9; thus effects are likely to be neutral.</p> <p>However, the potential for archaeology is unknown at this stage and there currently is no policy to provide protection/ mitigation against direct effects on archaeological assets. In the absence of a protection policy, the effects therefore are considered to be uncertain.</p>	<table border="1"> <tr> <td style="background-color: #0070C0; color: white; text-align: center;">○</td> <td style="text-align: center;">?</td> </tr> </table>	○	?
○	?			
Protect and enhance the area's distinctive historic environment				

<sup>30</sup> Green Belt Review (2011) <http://www.gct-ics.org/Documents/EvidenceBase/JCSGBReviewFinalSept2011.pdf> (accessed March 2014)

<sup>31</sup> English Heritage (2014) National Heritage List for England. Online at <http://list.english-heritage.org.uk/mapsearch.aspx> [accessed March 2014]

Potential Strategic Allocation: Twigworth (includes potential safeguarded land)			
Sustainability Objective		Assessment of Effects	
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making	
		<b>Description:</b> 1600 dwellings; GI network in FZ 3; new school & community facilities? <b>Initial SA Summary Report (2011) Ref.:</b> part of original broad location G1-Land North of Gloucester <b>2014 SA:</b> 2084 dwellings;	
248	<p><b>8 SUSTAINABLE TRANSPORT</b></p> <p>Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car</p>	<p>The potential allocation has a network of footpaths which could be enhanced as part of an overall sustainable transport plan for the site. These paths could provide good linkages to, and improvements to, existing public transport facilities on the A38 and A40 for commuting into the city thus reducing the need to travel by high carbon modes of transport. This should be secured through Policies SD5, INF1 and INF2 which require passenger transport links, safe and convenient pedestrian and cycle routes within and adjoining the development.</p> <p>The urban extension here provides good opportunities to link from the rest of the city and to the wider countryside.</p> <p>Given the size of the allocation and although there are no known traffic and transport issues, it is likely that there could both short-term (during construction) and long-term negative effects on the existing road network with potential for congestion. However, mitigation is provided in Policy INF2.</p> <p>The implementation and effectiveness of mitigation measures and potential enhancement would be more certain with the reinstatement of site specific requirements in Policy SA 1 (and other Core Policies together with clear planning briefs and masterplanning), including requirements for new transport links to A38, mitigation of traffic impact, high quality public transport, and safe, easy pedestrian &amp; cycle links.</p>	<p>++ ?</p>
	<p><b>9 WASTE AND POLLUTION</b></p>	<p>Given the scale of development proposed there are likely to be negative effects as large amounts of waste will be created in the short-term during construction and in the long-term by additional</p>	<p>-</p>

Potential Strategic Allocation: Twigworth (includes potential safeguarded land)			
Sustainability Objective		Assessment of Effects	
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making	
		<b>Description:</b> 1600 dwellings; GI network in FZ 3; new school & community facilities?	
		<b>Initial SA Summary Report (2011) Ref.:</b> part of original broad location G1-Land North of Gloucester <b>2014 SA:</b> 2084 dwellings;	
	Minimise pollution and waste to landfill	households and businesses generating waste day to day. Mitigation has been put in place in the long-term only through the requirement to submit a waste minimisation statement under Policy SD4.  Air, light and noise pollution are likely to increase – particularly during the construction phases in the shorter term. This may affect the residential areas to the South East and East of the proposed strategic site. Mitigation is provided by Policy SD15.	
10	<b>THE ECONOMY</b>  Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	N/A	○
11	<b>CITY AND TOWN CENTRES</b>	The urban extension approach with a strategic site providing both housing and employment land at the edge of the city (within 3.2 km) with good transport into the centre will support the vitality and viability of the city centre with major positive effects.	++

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Potential Strategic Allocation: Twigworth (includes potential safeguarded land)			
Sustainability Objective		Assessment of Effects	
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making	
		Description: 1600 dwellings; GI network in FZ 3; new school & community facilities?	
		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester 2014 SA: 2084 dwellings;	
	Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations		
12	<b>SUSTAINABLE COMMUNITIES: EQUALITY</b> Reduce inequalities in wellbeing and opportunity	The allocation could reduce inequalities in wellbeing and opportunity through providing good quality housing, employment opportunities and an improved transport network to create better access to facilities and services for all – effectiveness depends upon details of masterplanning (and see SA Objective numbers 8 Transport 14 Health and 15 Housing). The urban extension approach provides a scale at which high quality design and accessibility for all should be more deliverable and certain.	++
13	<b>SUSTAINABLE COMMUNITIES: SAFETY</b> Reduce crime and the fear of crime	The allocation could provide an opportunity to reduce crime as it will provide good quality housing. This will provide attractive places to live which people will want to look after and where people will feel safe. Policy SD5 requires, where appropriate, that new development should demonstrate how a design principle relating to safety and security has been incorporated which is likely to lead to minor positive effects.	+
14	<b>HEALTH</b>	The opportunities for improved accessibility to green space as part of wider GI network, including footpaths and the Gloucestershire Way, long distance path, will have positive effects on health.	++

Potential Strategic Allocation: Twigworth (includes potential safeguarded land)				
Sustainability Objective		Assessment of Effects		
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making		
		Description: 1600 dwellings; GI network in FZ 3; new school & community facilities?		
		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester 2014 SA: 2084 dwellings;		
251	Improve access to health facilities and promote healthy	<p>The allocation also includes extra care facilities leading to long-term positive effects on health.</p> <p>The potential site includes local primary school and children's centre; sustainability could be enhanced if such facilities could provide other uses, especially for older children/young adults in the evening, and/or local doctor/nurse attendance.</p> <p>The site is not within walking of health care facilities although in the wording of Policy INF5 there is a requirement for the provision of contributions for local infrastructure including facilities and services. Despite local health facilities not being specified, it is assumed that this is a consideration.</p> <p>In addition, Policy SD15 requires a proposal for development at this site must be accompanied by a Health Impact Assessment.</p>		
	<b>15 HOUSING</b>	Major positive effects for contributing to the locally identified need for housing, including affordable housing. The scale of the allocation should enable a good range of type and tenure with flexibility for changing needs over time with long term cumulative positive effects – details depend on planning brief and masterplanning.		++
	Ensure everyone has access to a decent home that they can afford and meets their needs	Policies SD11, SD4, SD12, SD13 and SD5 will ensure that that new housing provides the right mix and type, a contribution to affordable housing, and also the development of high quality sustainable homes. This will have major long-term positive effects on housing.		
<b>16 GREEN SPACE</b>			++	

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Potential Strategic Allocation: Twigworth (includes potential safeguarded land)			
Sustainability Objective		Assessment of Effects	
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making	
		Description: 1600 dwellings; GI network in FZ 3; new school & community facilities?	
		Initial SA Summary Report (2011) Ref.: part of original broad location G1-Land North of Gloucester 2014 SA: 2084 dwellings;	
	Create, enhance, protect, connect and improve access to open spaces	There are footpaths crossing the potential site and linking to the Gloucestershire Way, a long distance route between Tewkesbury and Chepstow. Accessibility will be enhanced through the improvement to the GI network – if implemented through Policy INF4.	
17	<b>EDUCATION AND SKILLS</b>  Improve access to education and life-long learning and enhance skills	The urban extension approach with easy accessibility from the edge to the city centre will support existing educational services. Uncertainty of provision of educational facilities.	+
18	<b>CULTURE AND TOURISM</b>  Protect and enhance cultural heritage and promote tourism	There are no cultural heritage or tourism assets on or adjacent to the site that are likely to be affected, so the effects are likely to be neutral.	○

Potential Strategic Allocation: Twigworth (includes potential safeguarded land)	
<b>Sustainability Objective</b>	<b>Assessment of Effects</b>
	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); mitigation possibilities, residual effects; Uncertainty; Recommendations for plan-making
	<b>Description:</b> 1600 dwellings; GI network in FZ 3; new school & community facilities?
<b>Initial SA Summary Report (2011) Ref.:</b> part of original broad location G1-Land North of Gloucester <b>2014 SA:</b> 2084 dwellings;	
<p><b>Summary of Key Negative and Positive Effects for Sustainable Development:</b></p> <p>The allocation is located on a parcel of Land to the north of the City of Gloucester, adjacent to Innsworth. The allocation supports the SA objectives of Climate change adaptation and Transport, with uncertainty of effects on Historic environment and Sustainable communities – safety. There is potential for minor negative effects on the SA objectives of Resources – use and quality and Waste and pollution, given the location of the option on Greenfield land in the green belt, being located in a groundwater drinking water protected area and the scale of the development proposed.</p> <p><b>Key Negative Effects:</b></p> <ul style="list-style-type: none"> <li>▪ No significant negative environmental effects have been identified.</li> </ul> <p><b>Key Positive Effects:</b></p> <ul style="list-style-type: none"> <li>▪ The allocation is likely to lead to significant positive environmental effects on the following SA objectives: Biodiversity; Flooding; City and town centres; Sustainable communities - equality and wellbeing; Health; Housing; and Green Space.</li> </ul> <p><b>Mitigation, Recommendations and Residual Effects for Plan-making</b></p> <ul style="list-style-type: none"> <li>▪ None.</li> </ul>	

**Potential Strategic Allocation: West of Cheltenham**

Sustainability Objective		Assessment of Effect	
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years) / long term (10-20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
		Description: H = 500 dwellings and 40ha of employment land	
		Initial SA Summary Report (2011) Ref: previously assessed as part of original broad location C5; SA recommended that the southern and eastern parts of this broad location are taken forward as positive effects for transport & accessibility.	
254	<b>1 BIODIVERSITY</b>  Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats	There are no international, or national nature conservation designations on or adjacent to the allocation site which could be directly affected <sup>32</sup> . The site does however contain Fiddler's Green Lane Key Wildlife Site. It is assumed that this area could be retained in development, however there is the potential for a residual minor negative effect on biodiversity as a result of increased noise and light pollution and disturbance. The site is predominantly arable and characterised by fields surrounded by hedgerows, with opportunities to enhance biodiversity. There is a Lowlands Meadows BAP Priority Habitat in the south east corner of the site, and small areas of Deciduous Woodland Priority Habitats across the site. Development has the potential to restore and enhance the BAP priority habitats, and improve community access to this area, in line with Policy SD10, with the potential for major positive effects. Protected species should be safeguarded in line with Policy SD10.	++
	<b>2 CLIMATE CHANGE MITIGATION</b>  Reduce contribution to climate change and support households and businesses in reducing their carbon footprint	There is the potential to reduce contribution to climate change on the site through compliance with Policy SD4 which requires a minimum of 10% of energy demand to come from decentralised and renewable or low carbon sources. This is likely to lead to minor positive effects on climate change mitigation, and these positive effects would be enhanced by a higher percentage than 10%. The effects further depend upon implementation of other policies including; SD4 on sustainable design, SD5 advising design requirements, and policies which seek to encourage a modal shift, including Policy SD5.	+

<sup>32</sup> Defra (2013) Magic Map Application. Online at <http://magic.defra.gov.uk> [accessed April 2016]



3	<b>CLIMATE CHANGE ADAPTATION</b>	In accordance with Policy SD4 all development will be expected to be adaptable to climate change in respect of the design, layout, siting, orientation and function of buildings and external spaces. Therefore, the effects on climate change adaptation are expected to be minor positive. [ It should be noted that flooding is considered separately under SA Objective 4.]	+		
	Adapt to the consequences of climate change				
	4	<b>FLOODING</b>	The site option is not located within Flood Risk Zones 2 or 3; however, areas of the site in the north west corner and along the southern boundary are identified as susceptible to surface water flooding <sup>33</sup> . Policy INF3 requires new development to incorporate suitable Sustainable Drainage Systems to manage surface water drainage, which should mitigate any potential negative effects. Potential for a residual neutral effect.	0	
		Manage and reduce flood risk and surface water run-off			
5	<b>NATURAL ENVIRONMENT AND RESOURCES: QUALITY</b>	The site option is not located within or adjacent to any landscape designations and the previously assessed strategic allocation C5 was identified as of medium – low landscape sensitivity. The Vision Statement for the site also identifies that views into the site are generally well screened by existing vegetation. There are views towards the Cotswolds escarpment from open, higher points in the site, and development should seek to retain these. There is the potential for minor positive effects on landscape character through habitat restoration (as identified against the topic of biodiversity) and positive contributions to Green Infrastructure in line with Policy INF4.  The site option partially overlies a minor aquifer of intermediate vulnerability <sup>34</sup> . Development could have minor negative effects on groundwater quality from contaminated run-off particularly during construction.	+	-	
	Protect and improve the quality of natural resources including soil, water and landscape				
6	<b>NATURAL ENVIRONMENT AND RESOURCES: USE</b>	The effects on the use of natural resources will depend upon the design and construction methods to be used at the development management level. Mitigation for potential negative effects arising is provided through Policy SD4.  The site option is located within the Green Belt, and is predominantly Greenfield land. Development at the site option could result in the loss of Grade 3 agricultural land although at this stage it is not known if this is sub-grade 3a or 3b. Development is considered to have the	-		
	Minimise the use of natural resources including soil, water and Greenfield land through good design				

<sup>33</sup> Environment Agency (2016) Flood Maps - Risk of Flooding from Rivers and Sea, and Risk of Flooding from Surface Water [online] <http://apps.environment-agency.gov.uk/wiyby/37837.aspx>

<sup>34</sup> Environment Agency (2016) Drinking Water Safeguard Zones and Groundwater Maps [online] <http://apps.environment-agency.gov.uk/wiyby/37837.aspx>

		potential for minor long-term negative effects on the use of natural resources through the loss of agricultural land.	
<b>7</b>	<b>HISTORIC ENVIRONMENT</b>  Protect and enhance the area's distinctive historic environment	There are no designated heritage assets within the site, however a small number of Listed Buildings are located adjacent to the site is the north west corner and to the south. Policy SD9 provides mitigation for the historic environment and seeks to conserve heritage in a manner appropriate to its significance. Development is unlikely to lead to any significant effects, with the potential for a residual neutral effect.	<b>0</b>
<b>8</b>	<b>SUSTAINABLE TRANSPORT</b>  Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by private car	<p>The Vision Statement identifies that the site is located adjacent to the existing built up area of Springbank which contains a range of local services and facilities. There are also good public transport links locally and connecting with Cheltenham City Centre, as well as pedestrian and cycle connections with the potential for minor long term positive effects.</p> <p>Given the size of the allocation it is likely there could be both short-term (during construction) and long-term negative effects on the existing road network with potential for congestion. Mitigation may be required (and is available) to reduce potential negative effects. Mitigation is also provided through policies SD5 and INF7 which seek to reduce the potential negative effects of increases in traffic, improve accessibility and reduce the need to travel. Overall it is considered that there is the potential for a residual minor negative effect with an element of uncertainty at this stage.</p>	<b>+</b> <b>- ?</b>
<b>9</b>	<b>WASTE AND POLLUTION</b>  Minimise pollution and waste to landfill	<p>The site contains Hayden sewage works, which is expected to be relocated prior to the development of Phase 2 on site. Small areas of Phase 1 development however may be subject to odour pollution associated with the works until relocation has taken place with the potential for minor short term negative effects. Given the scale of development proposed, there are likely to be negative effects as a result of increased waste production, both in the short-term during construction and residential waste in the longer term. Mitigation provided through Policy SD4 should ensure that development will not lead to any significant negative effects, particularly through the requirement for a waste minimisation statement in large development proposals.</p> <p>The site is adjacent residential development in the east that may be sensitive to noise during construction. Mitigation is provided through Policies SD15 and INF2 to minimise potential negative effects.</p>	<b>-</b>

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		<p>The site is located adjacent to Cheltenham which is a designated AQMA, it is likely that there could be both short-term (during construction) and long-term negative effects on air quality through increased traffic as a result of development. Mitigation for potential increases in traffic is noted above in the topic of sustainable transport.</p> <p>Overall it is considered that there is the potential for residual minor long-term negative effects on waste and pollution as a result of development at the site option.</p>	
<b>10</b>	<b>THE ECONOMY</b>  Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	The site option is likely to lead to major long term positive effects on the economy through the provision of 40ha of new employment land.	++
<b>11</b>	<b>CITY AND TOWN CENTRES</b>  Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	Although the site option is located on the town's edge, it is well located in relation to the main settlement with opportunities to improve public transport (see SA Objective 8). Therefore, the site option is expected to support the vitality and viability of Gloucester City Centre, with the potential for major long term positive effects.	++
<b>12</b>	<b>SUSTAINABLE COMMUNITIES: EQUALITY</b>  Reduce inequalities in wellbeing and opportunity	The allocation could provide a chance to reduce inequalities in wellbeing and opportunity through providing housing and employment opportunities and an improved transport network to create better access to services and facilities for all. At present, the effects are considered to be uncertain and may depend on negotiations at the development management level.	?
<b>13</b>	<b>SUSTAINABLE COMMUNITIES: SAFETY</b>  Reduce crime and the fear of crime	The allocation could provide an opportunity to reduce crime as new housing could provide high quality and safe homes. Mitigation provided through Policy SD5 should ensure that there will be no significant negative effects, potential for a residual neutral effect with an element of uncertainty at this stage.	0 ?
<b>14</b>	<b>HEALTH</b>	The allocation provides the opportunity for the creation of new high quality homes, which will have minor indirect positive effects on health.	+

	Improve access to health facilities and promote healthy lifestyles	Furthermore, Policies INF5 and INF7 seek the appropriate provision or accessibility to open space, which may lead to positive effects on health, with the potential for major long-term effects if implemented successfully. This will depend in part on ensuring that Green Infrastructure provided as a result of development includes provisions for long term management.	
<b>15</b>	<b>HOUSING</b>  Ensure everyone has access to a decent home that they can afford and meets their needs	The site option is likely to lead to major long term positive effects on housing through the provision of 500 new high quality homes.	++
<b>16</b>	<b>GREEN SPACE</b>  Create, enhance, protect, connect and improve access to open spaces	The site option is greenfield arable land and development will ultimately remove this green space constituting a long term minor negative effect on green space. However, development at this large site is likely to deliver new green space, or provide significant contributions to enhancing existing green space, which could result in higher quality open spaces with the potential for minor long term positive effects.	+
<b>17</b>	<b>EDUCATION AND SKILLS</b>  Improve access to education and life-long learning and enhance skills	The site option does not propose educational / training facilities and as such is unlikely to lead to any significant effects against this SA Objective. The effects remain uncertain at this stage but are likely to be neutral.	0?
<b>18</b>	<b>CULTURE AND TOURISM</b>  Protect and enhance cultural heritage and promote tourism	Given the nature of the site option, as housing and employment development, effects on this SA Objective are considered to be neutral.	0
<p><b>Summary of Key Negative and Positive Effects for Sustainable Development:</b></p> <p>The site option is located on a parcel of land to the west of Cheltenham, in between the existing urban area and the M5 motorway. The site option would support the SA Objectives of Biodiversity; Climate Change - Mitigation; Climate Change- Adaptation; Natural Environment and Resources - Quality; Sustainable Transport; City and Town Centres; Health; Housing and Green Space. There is the potential for minor negative effects on the SA Objective of Natural Environment and Resources - Use; Natural Environment and Resources - Quality; Sustainable Transport; and Waste and Pollution as a result of the large scale of development proposed.</p>			

**Key Negative Effects:**

- Development will result in the loss of greenfield and Grade 3 agricultural land located within the designated Green Belt
- Development is likely to increase traffic on the highways network, and indirectly negatively affect air quality
- Phase 1 development could be subject to short term minor negative effects on health and amenity until Hayden sewage works are relocated

**Key Positive Effects (when Haydon sewage works are relocated or odour emissions are mitigated):**

- The provision of new, high quality housing and supporting infrastructure (including new green space) which is resilient to the effects of climate change
- Delivery of development within an accessible location, with the potential to extend existing public transport routes
- Potential for restoration of a BAP Priority Habitat

Potential Strategic Allocation: 2 Sites at Winneycroft Lane/Corncroft Lane, Gloucester			
Sustainability Objective		Assessment of Effect	
		Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years) / long term (10-20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
		Description: H = 620 new dwellings	
		Initial SA Summary Report (2011) Ref: includes a very small part to the north-west of the previously assessed broad location G6.	
1	<p><b>BIODIVERSITY</b></p> <p>Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats</p>	<p>There are no international, national or local nature conservation designations on or adjacent to the allocation site which could be directly affected<sup>35</sup>. The site is predominantly arable and characterised by fields surrounded by hedgerows, with opportunities to enhance biodiversity. There is a Traditional Orchard BAP Priority Habitat in the north east corner of the site, and surveys have identified the presence of protected species, including bats, badger, breeding birds and slow-worm. Development has the potential to restore and enhance the BAP priority habitat, and improve community access to this area, in line with emerging Policy SD10, with the potential for major positive effects. Protected species should be safeguarded in line with emerging Policy SD10.</p> <p>It should also be noted that the Sud Brook on-site flows into the Saintbridge Balancing Pond LNR, and mitigation measures to reduce potential negative effects have already been in discussion through the planning application 14/01470/OUT, and it is considered that suitable mitigation is available to ensure that there will be no significant negative effects. There is the potential to improve ecological connectivity between the BAP Priority habitat, the watercourse and the LNR.</p>	++
2	<p><b>CLIMATE CHANGE MITIGATION</b></p> <p>Reduce contribution to climate change and support households and</p>	<p>There is the potential to reduce contribution to climate change on the site through compliance with Policy SD4. This is likely to lead to minor positive effects on climate change mitigation. The effects further depend upon implementation of other policies including; SD4 on sustainable design, SD5 advising design requirements, and policies which seek to encourage a modal shift, including Policy SD5.</p>	+

<sup>35</sup> Defra (2013) Magic Map Application. Online at <http://magic.defra.gov.uk> [accessed April 2016]

	businesses in reducing their carbon footprint		
<b>3</b>	<b>CLIMATE CHANGE ADAPTATION</b>  Adapt to the consequences of climate change	In accordance with Policy SD4 all development will be expected to be adaptable to climate change in respect of the design, layout, siting, orientation and function of buildings and external spaces. Therefore, the effects on climate change adaptation are expected to be minor positive. [ It should be noted that flooding is considered separately under SA Objective 4.]	+
<b>4</b>	<b>FLOODING</b>  Manage and reduce flood risk and surface water run-off	The site option is not located within Flood Risk Zones 2 or 3; however, a small area that surrounds the Sud Brook is identified as susceptible to surface water flooding <sup>36</sup> . Emerging Policy INF3 requires new development to incorporate suitable Sustainable Drainage Systems to manage surface water drainage, which should mitigate any potential negative effects. Potential for a residual neutral effect.	0
<b>5</b>	<b>NATURAL ENVIRONMENT AND RESOURCES: QUALITY</b>  Protect and improve the quality of natural resources including soil, water and landscape	The site option is not located within or adjacent to any landscape designations and is separated from the high quality landscape of the AONB by the M5 motorway. The Landscape and Visual Impact Assessment that accompanied planning application 14/01063/OUT identifies a medium landscape sensitivity and an overall anticipated effect of proposed development on landscape character of the locality is assessed as minor beneficial and permanent. Both planning applications 14/01063/OUT and 14/01470/OUT which cover the whole of the site when combined identify that there is no significant negative effect on the landscape character of the area.  There are several drainage features on site, as well as part of the Sud Brook. The site option is not located within a surface or groundwater protection, vulnerability or safeguard zone with the potential for a neutral effect.  There is the potential for minor positive effects on landscape character through habitat restoration (as identified against the topic of biodiversity) and positive contributions to Green Infrastructure in line with Policy INF4.	+

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<sup>36</sup> Environment Agency (2016) Flood Maps - Risk of Flooding from Rivers and Sea, and Risk of Flooding from Surface Water [online] <http://apps.environment-agency.gov.uk/wiyby/37837.aspx> [accessed April 2016]

6	<p><b>NATURAL ENVIRONMENT AND RESOURCES: USE</b></p> <p>Minimise the use of natural resources including soil, water and Greenfield land through good design</p>	<p>The effects on the use of natural resources will depend upon the design and construction methods to be used at the development management level. Mitigation for potential negative effects arising is provided through Policy SD4.</p> <p>The site option is not located within the Green Belt, however the site is entirely Greenfield land, and development at the site option could result in the loss of Grade 3b agricultural land with the potential for minor long-term negative effects on the use of natural resources.</p>	-
7	<p><b>HISTORIC ENVIRONMENT</b></p> <p>Protect and enhance the area's distinctive historic environment</p>	<p>The site option is located adjacent to Listed Buildings at Winneycroft Farm, and a Scheduled Monument (Moated Site at Sneedham's Green SM1019399) is located just south west of the site. The monument consists of a medieval moated site, of which the earthworks of the moat and buried structures survive. Its presence has led to the designation of the surrounding area by Gloucester City Council as an Area of Principal Archaeological Interest (APAI).</p> <p>The Heritage Setting Assessment that accompanies planning application 14/01063/OUT assesses the impact of the proposed development on seven Listed Buildings in close vicinity of the site, as well as the Scheduled Monument, and the Heritage Assessment that accompanies planning application 14/01470/OUT further assesses archaeological potential. The assessment on archaeology identifies that because of the potential for the site to contain buried archaeology of Roman date it is recommended that a geophysical survey be carried out, and potentially trial trenching. Both heritage assessments identify that development at the site options will affect the setting of the Listed Buildings at Winneycroft Farm, with the potential for minor, long-term indirect negative effects. However, given the sites' proximity to existing development and the motorway, and potential mitigation provided at the site level, this effect is identified as of no greater than slight significance. Development is not expected to significantly affect the setting of the Scheduled Monument due to existing dense hedgerows along the south west boundary largely preventing inter-visibility. It is recommended that these hedgerows are strengthened and retained in development – which will provide mitigation for negative effects.</p> <p>Overall it is considered that development at the site option has the potential for a residual minor long-term negative effect on the historic environment, and it is recommended that a detailed site specific policy is created to ensure that the appropriate mitigation for the historic environment is in place for development at this site.</p>	-



<p><b>8</b></p>	<p><b>SUSTAINABLE TRANSPORT</b></p> <p>Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by private car</p>	<p>The planning application 14/01063/OUT identifies that the site is located within 550m of the services and facilities along Matson Avenue, and has good public transport links locally and connecting with Gloucester City Centre, with the potential for minor long term positive effects.</p> <p>Given the size of the allocation it is likely there could be both short-term (during construction) and long-term negative effects on the existing road network with potential for congestion. The transport assessment accompanying planning application 14/01470/OUT considers the potential effects of both planning applications 14/01470/OUT and 14/01063/OUT coming forward at this site (which cover the whole of this site option), identifying the potential for negative impacts at the Painswick Road / Upton Hill / Corncroft Lane junction. Further mitigation will be required (and is available) to reduce potential negative effects. Mitigation is also provided through emerging policies SD5 and INF7 which seek to reduce the potential negative effects of increases in traffic, improve accessibility and reduce the need to travel. Overall it is considered that there is the potential for a residual minor negative effect with an element of uncertainty at this stage.</p> <p>It should be noted that planning application 14/01063/OUT further identified opportunities to expand and enhance existing bus routes, which could lead to positive effects for both new and existing communities.</p>	<p>+</p>	<p>- ?</p>
<p><b>9</b></p>	<p><b>WASTE AND POLLUTION</b></p> <p>Minimise pollution and waste to landfill</p>	<p>There are no historic landfill or pollution / waste related facilities or incidents within close vicinity of the site option. Given the scale of development proposed, there are likely to be negative effects as a result of increased waste production, both in the short-term during construction and residential waste in the longer term. Mitigation provided through Policy SD4 should ensure that development will not lead to any significant negative effects, particularly through the requirement for a waste minimisation statement in large development proposals.</p> <p>The northern edge of the site is adjacent residential development that may be sensitive to noise during construction. There is also the potential for negative effects for future residents at the site option as a result of noise from the adjacent M5. This could result in short-term minor negative effects. Mitigation is provided through Policies SD15 and INF2 to minimise potential negative effects.</p> <p>The site is not located within an AQMA, however, it is likely that there could be both short-term (during construction) and long-term negative effects on air quality through increased traffic as a result of development. Mitigation for potential increases in traffic is noted above in the topic of sustainable transport.</p>	<p>-</p>	

		Overall it is considered that there is the potential for residual minor long-term negative effects on waste and pollution as a result of development at the site option.	
<b>10</b>	<b>THE ECONOMY</b>  Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses	The site option is proposed for housing development and as such is unlikely to lead to any significant long term effects on the economy. Potential for a neutral effect.	<b>0</b>
<b>11</b>	<b>CITY AND TOWN CENTRES</b>  Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	Although the site option is located on the town's edge, it is well located in relation to the main settlement with opportunities to improve public transport (see SA Objective 8). Therefore, the site option is expected to support the vitality and viability of Gloucester City Centre, with the potential for major long term positive effects.	<b>++</b>
<b>12</b>	<b>SUSTAINABLE COMMUNITIES: EQUALITY</b>  Reduce inequalities in wellbeing and opportunity	The allocation could provide a chance to reduce inequalities in wellbeing and opportunity through providing housing opportunities and an improved transport network to create better access to services and facilities for all. At present, the effects are considered to be uncertain and may depend on negotiations at the development management level.	<b>?</b>
<b>13</b>	<b>SUSTAINABLE COMMUNITIES: SAFETY</b>  Reduce crime and the fear of crime	The allocation could provide an opportunity to reduce crime as new housing could provide high quality and safe homes. Mitigation provided through emerging Policy SD5 should ensure that there will be no significant negative effects, potential for a residual neutral effect with an element of uncertainty at this stage.	<b>0?</b>
<b>14</b>	<b>HEALTH</b>  Improve access to health facilities and promote healthy lifestyles	The allocation provides the opportunity for the creation of new high quality homes, which will have minor indirect positive effects on health.  Furthermore, Policies INF5 and INF7 seek the appropriate provision or accessibility to open space, which may lead to positive effects on health, with the potential for major long-term effects if implemented successfully. This will depend in part on ensuring that Green	<b>+</b>

		Infrastructure provided as a result of development includes provisions for long term management.	
<b>15</b>	<b>HOUSING</b>  Ensure everyone has access to a decent home that they can afford and meets their needs	The site option is likely to lead to major long term positive effects on housing through the provision of 620 new high quality homes.	++
<b>16</b>	<b>GREEN SPACE</b>  Create, enhance, protect, connect and improve access to open spaces	The site option is greenfield arable land and development will ultimately remove this green space constituting a long term minor negative effect on green space. However, development at this large site is likely to deliver new green space, or provide significant contributions to enhancing existing green space, which could result in higher quality open spaces with the potential for minor long term positive effects.	+
<b>17</b>	<b>EDUCATION AND SKILLS</b>  Improve access to education and life-long learning and enhance skills	The site option does not propose employment development or educational / training facilities and as such is unlikely to lead to any significant effects against this SA Objective. The effects remain uncertain at this stage but likely to be neutral.	o?
<b>18</b>	<b>CULTURE AND TOURISM</b>  Protect and enhance cultural heritage and promote tourism	Given the nature of the site option, as housing development, effects on this SA Objective are considered to be neutral.	o

**Summary of Key Negative and Positive Effects for Sustainable Development:**

The site option is located on a parcel of land to the south of Gloucester, in between the existing urban area and the M5 motorway. The site option would support the SA Objectives of Biodiversity; Climate Change - Mitigation; Climate Change- Adaptation; Natural Environment and Resources - Quality; Sustainable Transport; City and Town Centres; Health; Housing and Green Space. There is the potential for minor negative effects on the SA Objective of Natural Environment and Resources - Use; Historic Environment; Sustainable Transport; and Waste and Pollution as a result of the large scale of development proposed.

**Key Negative Effects:**

- Potential for development to negatively affect the setting of designated heritage assets, and there is a need for further archaeological investigation
- Development will result in the loss of greenfield and Grade 3b agricultural land
- Development is likely to increase traffic on the highways network, and indirectly negatively affect air quality

**Key Positive Effects:**

- The provision of new, high quality housing and supporting infrastructure (including new green space) which is resilient to the effects of climate change
- Delivery of development within an accessible location, with the potential to extend existing public transport routes
- Potential for restoration of a BAP Priority Habitat

**Mitigation, Recommendations and Residual Effects for Plan-making:**

- It is recommended that a detailed site specific policy is created to ensure that appropriate mitigation for the historic environment is in place for development at this site option.

## New Strategic Allocations & Other Strategic Options Reconsidered: HRA Screening

Proposed Modification: New Strategic Allocations	Potential Impacts of the Allocation	Potential for Likely Significant Effects (LSEs)?
<p><b>A10: Land at Winnycroft / Corncroft Lane</b></p> <ul style="list-style-type: none"> <li>■ 620 new dwellings</li> </ul>	<p>Site is located around 2.3km from the Cotswold Beechwoods SAC, and the M5 motorway is located between the development site and the SAC. The watercourse on site does not connect directly to SAC, however development should seek to minimize effect on water quality. The A46 runs within 200m of the SAC and development at the site may lead to increased traffic along this road and therefore increased atmospheric pollution affecting the integrity of the SAC. The direct road connections also have the potential to increase recreational disturbance at the site.</p> <p>Potential in-combination effects have been considered and are found not to be significant. Further information detailed in Appendix IV and Section 4 of the HRA (AA) Report (May 2014 SAPR114-119).</p> <p>Further assessment of recreational impacts was considered and reported in the HRA Addendum Report (May 2015 SAPR119a).</p>	<p>Yes but mitigated through previous recommendations &amp; the development of the Statement of Cooperation with Natural England during the examination stages (SEB108C pages 119-124) and Policy SD10.</p>
<p><b>A11: Land West of Cheltenham</b></p> <ul style="list-style-type: none"> <li>■ 500 new dwellings</li> <li>■ 40ha of employment land</li> </ul>	<p>The site is located over 7.5km from the closest European site (Cotswold Beechwoods SAC) and as such is unlikely to lead to any significant effects alone. There are no direct environmental pathways that are likely to lead to any significant effects.</p> <p>Potential in-combination effects have been considered and are found not to be significant. Further information detailed in Appendix IV and Section 4 of the HRA (AA) Report (May 2014 SAPR114-119).</p>	<p>No</p>
<p><b>Twigworth</b></p>	<p>The site is located over 7km from the Cotswolds Beechwoods SAC and as such is unlikely to lead to any significant effects alone. The site has two brooks (Hatherley and Horsbere Brooks) running through it that eventually flow into the River Severn a km away. The River Severn SAC/ SPA/ Ramsar and Walmore</p>	<p>No</p>

Proposed Modification: New Strategic Allocations	Potential Impacts of the Allocation	Potential for Likely Significant Effects (LSEs)?
	<p>Common SPA/Ramsar are downstream so there is the potential for impacts alone on water quality. The Brooks flowing through the site should be protected and retained and any proposal for development should ensure that impacts on water quality and resources are minimised.</p> <p>Potential in-combination effects have been considered and are found not to be significant. Further information detailed in Appendix IV and Section 4 of the HRA (AA) Report (May 2014 SAPR114-119).</p>	
<b>Fiddington</b>	<p>The site is located around 5.5km from the Dixton Wood SAC and as such is unlikely to lead to any significant effects alone. Tirlle Brook flows through the site and eventually joins the River Avon which flows into the River Severn. The River Severn SAC/ SPA/ Ramsar and Walmore Common SPA/Ramsar are downstream so there is the potential for impacts alone on water quality. The Brook flowing through the site should be protected and retained and any proposal for development should ensure that impacts on water quality and resources are minimised.</p>	No
<b>Mitton</b>	<p>The site is located around 5.5km from the Bredon Hill SAC and as such is unlikely to lead to any significant effects alone. Carrant Brook flows through the site and eventually flows into the River Avon, which flows into the River Severn. The River Severn SAC/ SPA/ Ramsar and Walmore Common SPA/Ramsar are downstream so there is the potential for impacts alone on water quality. The Brook flowing through the site should be protected and retained and any proposal for development should ensure that impacts on water quality and resources are minimised.</p>	No

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6<sup>th</sup> October 2016

Dear Mr Dibble,

Thank you for your letters of 19 and 23 September 2016 on behalf of the Leaders of the Joint Core Strategy Authorities. I have considered your comments and my response is set out below.

I have recommended a 5% uplift on the objectively assessed housing need based on the evidence before me and national planning policy and guidance. If you wished for this matter to be re-opened, it would need to be done through a hearing session to ensure that natural justice prevailed and participants had an opportunity to make comment in response.

With respect to participation, I intend to hold hearing sessions on the main modifications to the Joint Core Strategy. An opportunity will be given to speak at those sessions to those people who respond to the main modifications consultation.

With respect to not allocating Fiddington, as Tewkesbury District is unable to meet its housing requirement and is seeking assistance from Wychavon, the reasons for omitting Fiddington should be sound and properly evidenced.

I have the same comment for Twigworth. Furthermore, because Twigworth makes a lesser contribution to the Green Belt than some other strategic allocations around Gloucester and appears to be equally as sustainable, there may be soundness issues if no good land use planning reasons are put forward for its omission.

I note the position on the new household projections and the update regarding Wychavon District Council and thank you for this.

Through my programme officer I have been in contact with JCS planning officers about the main modifications and supporting documents and I understand that a modified version of the JCS will shortly be submitted to you for consideration prior to public consultation.

I would also add that I am committed to progressing this examination as far as possible towards what I hope will be a sound conclusion.

Yours sincerely,

*Elizabeth C. Ord*

Inspector



# Agenda Item 6

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