

Joint Core Strategy Review

Issues and Options Consultation (Regulation 18)

October 2018



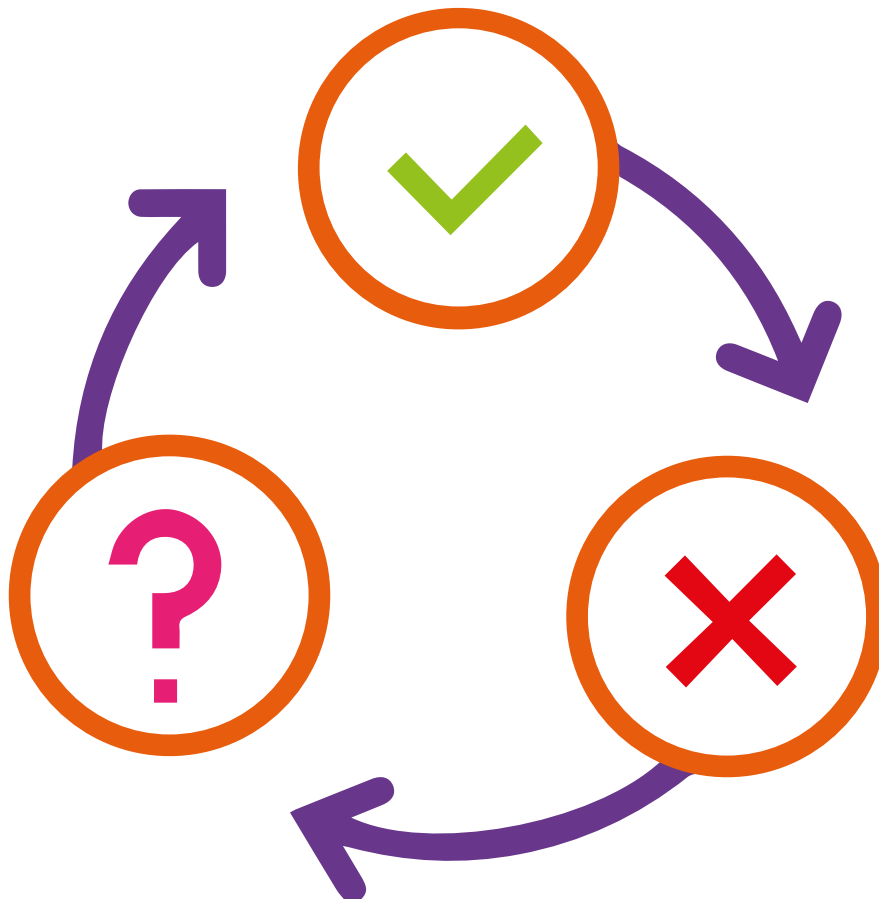
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1. Introduction

- 1.1.** Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council are undertaking a review of the adopted Joint Core Strategy (JCS) (December 2017), the JCS Review.
- 1.2.** The adopted JCS contains a commitment to undertake an immediate review on the issues of housing supply for Gloucester and Tewkesbury and the retail / town centre policies for the whole area.
- 1.3.** In July 2018 the Government published a revised National Planning Policy Framework (NPPF) which places new requirements on local plan making. This means that the scope of the review will need to be expanded to ensure it will be in conformity with national policy.
- 1.4.** In addition, it is necessary to review the delivery of strategic allocation sites identified in the JCS and ensure that each authority is able to meet its housing and employment requirements, including maintaining a five year supply of housing land.
- 1.5.** Fundamentally the JCS Review will again look at the future growth needs, what the best strategy is for delivering that growth, and the allocation of strategic sites to help meet these needs. However, it is also an opportunity to review all of the policies contained with the current adopted plan to see if they continue to be effective and consistent with the NPPF.



'Issue and Options' consultation

- 1.6.** In accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Councils are publishing an Issues and Options paper for public consultation. This stage of plan making seeks to get feedback on the key issues that are affecting the area and explore some of the options that are available to address them.
- 1.7.** It is a starting point for the review and an evidence gathering process to inform the future development of the plan. It therefore does not propose a strategy, new sites or policies; this will be for the next stages of the plan.
- 1.8.** The consultation is split up into a number of different themes/policy areas and for each there are a series of questions that we seek views on.
- 1.9.** The issues and options consultation runs from Monday 12th November 2018.

How can I get involved?

Responding to the consultation

- 1.10.** We are asking people to respond directly to the questions posed; these questions are in coloured boxes at the end of relevant pages under each section of this document. This will assist the authorities in determining the key issues being raised under each theme.
- 1.11.** Wherever possible, in order for the consultation process to be efficient as it can be, we ask that you respond to these questions via the consultation portal - see link below:
<http://consult.gct-jcs.org/consult.ti/iando/consultationHome>
- 1.12.** Alternatively you may download an electronic response, fill it in and send it to:
 - Email: info@jointcorestrategy.org
 - Post: Joint Core Strategy, Municipal Offices, Promenade, Cheltenham, GL50 9SA.
- 1.13.** Please note that if your response is not provided in accordance with the key questions, officers will add your response to the 'Any other comments' question when processing.
- 1.14.** Further information, including associated background papers as well as previous JCS evidence base, is available on the JCS website at <https://jointcorestrategy.org/>

Call for sites

- 1.15.** This consultation includes a ‘call for sites’. Landowners, developers and the community are invited to submit sites to the authorities that they think could have development potential. Submissions will be assessed by the local authorities and where suitable and deliverable, may be identified as allocations in future versions of this review. For more information please see Section 12 of this document.

General Data Protection Regulations / consultation database

Responding to the consultation

- 1.16.** For the JCS Review, there is a new consultation database. This is to ensure that the authorities meet their requirements under the General Data Protection Regulation (GDPR) and to ensure that only those people who are interested in the JCS Review are contacted.
- 1.17.** With this in mind, when responding to the consultation, you will be asked to confirm whether or not you wish to be added to the database and kept informed of the JCS Review as it progresses. You will also be advised of how you can be removed from the database if you so wish.
- 1.18.** You can also sign up to the consultation database regardless of whether you want to respond to this consultation.

Plan making programme

- 1.19.** The indicative timetable the authorities are currently working towards is as follows:
- Issue and Options – October 2018
 - Draft Plan consultation – Autumn 2019
 - Pre-Submission Plan consultation – Summer 2020
 - Submission to the Secretary of State – Autumn 2020
 - Examination – Winter 2020/21
 - Adoption – Winter 2021

Relationship with district plans

- 1.20.** The JCS authorities are currently in the process of taking forward their district plans. These will deliver the adopted JCS locally as well as address local issues and priorities of a non-strategic nature.
- 1.21.** The timetables for taking the district plans forward can be found on each of the authority’s website:
- Gloucester City Plan:
<https://www.gloucester.gov.uk/planning-development/planning-policy/city-plan/>
 - Cheltenham Borough Plan:
https://www.cheltenham.gov.uk/info/46/planning_policy/1034/the_cheltenham_plan
 - Tewkesbury Borough Plan:
<https://www.tewkesbury.gov.uk/local-plan>

2. Scope

- 2.1.** The JCS (December 2017) commits to an immediate partial review of the plan to deal with the housing shortfalls for Gloucester and Tewkesbury and also a review of the policy around retail / town centres. This provides the minimum starting point for considering the scope and timescales for the JCS Review.
- 2.2.** There are, however, a number of other factors to be taken into account. Firstly, the NPPF states that policies in local plans should be reviewed at least once every five years and should be completed no later than five years from the adoption of a plan. Under this provision, the whole JCS plan would need to be reviewed in any event by December 2022. As such there needs to be a consideration as to whether the review now should be a holistic one to meet the NPPF requirements in the most efficient and effective way.
- 2.3.** Annual monitoring of housing delivery since adoption of the JCS has also demonstrated that some of the strategic allocation sites have not come forward as quickly as anticipated in the plan. This has impacted on the housing delivery for both Cheltenham and Gloucester. Furthermore, the NPPF has introduced a standard methodology for calculating housing requirements which may result in changes to the number of new homes required for each area. With this in mind, it may be practical to look at the housing supply for all three authorities in a more comprehensive way rather than just for the shortfalls of Gloucester and Tewkesbury separately. This will also be necessary if the timescale for the JCS Review is to extend past the current plan period (see Section 3).
- 2.4.** Other than for retail, the commitment to an immediate review in the JCS does not propose to look at any of the development management policy guidance contained in the plan. However, the NPPF has introduced new policy provisions that the JCS does not reflect. A wider review of the JCS to consider all policies within the plan would ensure they are brought fully up to date with the NPPF and provide an opportunity to make any necessary adjustments to improve their implementation.
- 2.5.** Taking this into account, it is considered that the JCS review needs to consist of a comprehensive review of the plan, including the housing requirements and supply for all three authorities as well as the suite of policy guidance.



Question 1

Do you consider that a comprehensive review of the plan is the correct approach for the JCS review? If not, what do you consider are the alternative approaches?

3. Timescale

- 3.1.** The current JCS plan period runs from 2011 to 2031. There are a number of issues to consider when thinking about whether the plan period should go beyond 2031.
- 3.2.** The NPPF states that strategic policies should look ahead at least 15 years from the point of adoption. This is to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. If the JCS review is adopted by 2021, this would require extending the plan period to at least 2036.
- 3.3.** Stroud District Council are currently undertaking a review of their local plan and are looking to 2036. The South Worcestershire authorities are also currently reviewing their local plan and are looking to 2041. With this in mind, a benefit of extending the JCS plan period beyond 2031 would be closer and provide more joined up strategic planning with adjacent areas, helping to tackle cross-boundary growth issues.
- 3.4.** Planning over a longer plan period will mean an increased requirement for new homes, employment and infrastructure, and the need to look at further locations for growth. A longer outlook and increased levels of growth would provide significant opportunities to plan strategically for how growth in the area is to come forward.
- 3.5.** Planning for a larger scale of development brings advantages in that it:
- Improves the longer term planning of essential infrastructure (such as roads and schools) that will bring benefits to both existing and future residents;
 - Allows for a more comprehensive approach to the delivery of development, maximising the benefits of the contribution of development on important issues such as green infrastructure and urban design; and
 - Increases opportunities for plan-led strategic development and reduces the potential for ad-hoc and piecemeal approaches.
- 3.6.** The Gloucestershire 2050 project is a county-wide conversation to explore ideas and shape the long-term future of the county. A consultation document was published in summer 2018 to start this discussion, which presented eight key ambitions based on different themes that Gloucestershire could aspire to. In addition it proposed 6 'big ideas', projects that could transform the county.
- 3.7.** Taking into account the issues set out above, the JCS authorities consider that undertaking a review to just the current plan period to 2031 would not be justified under the NPPF and would not be the most effective nor efficient method to plan strategically for future growth.

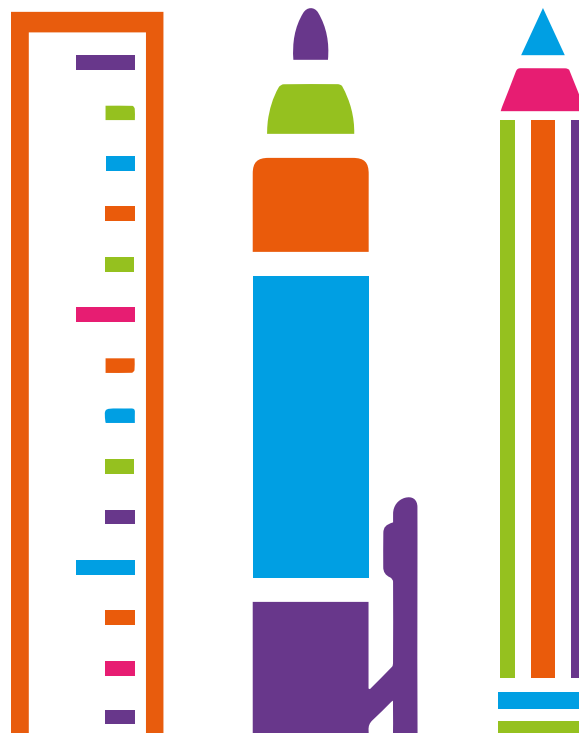


Question 2

On the basis that the plan period needs to be extended, what do you think is a reasonable timeframe for the JCS to plan for and why?

4. Plan making and policies

- 4.1. The current approach to local plan making in the JCS area is a two-tier approach with the JCS as the combined strategic level plan followed by individual district level plans for each of the authorities. This approach is intended to allow the JCS to concentrate on the high level strategic policies and larger-scale allocations and let the district level plans provide the more detailed locally-specific policies and smaller-scale allocations.
- 4.2. The NPPF states that the development plan must include strategic policies to address each local planning authority's priorities for the development and use of land in its area. It states that policies to address non-strategic policies should be included in local plans that can contain both strategic and non-strategic policies. Plans are expected to make explicit which policies are strategic policies.
- 4.3. The NPPF states that strategic policies should set out the overall strategy for the pattern, scale and quality of development and make sufficient provision for growth (including housing and employment), infrastructure, community facilities and policies for natural, built and historic environment. Where necessary, strategic policies should also address cross-boundary issues. Non-strategic policies should be used to set out more detailed policies for specific areas, neighbourhoods or types of development. This can also include site allocations, infrastructure and facilities, design principles and policies around the natural, built and historic environment.



Question 3

What are the strategic policy areas that you consider the JCS should cover?



Question 4

Do you consider any alterations to the existing policies in the adopted JCS are required, particularly in light of the revised NPPF?

5. Duty to Cooperate

- 5.1.** Planning legislation places a duty to cooperate on local planning authorities, county councils and other public bodies to ensure they work together on strategic matters that cross administrative boundaries. The three JCS authorities meet this duty, with each other, in that they have formed a partnership to take forward strategic plan making. However, how the JCS engages with other local authorities and their local plans in addressing growth, is of critical importance.
- 5.2.** The NPPF requires strategic plan making authorities to collaborate to identify the relevant strategic matters which they need to address in their plans. This includes joint working on planning of infrastructure and helping to meet development needs where they cannot be met wholly within a particular plan area. This collaboration in plan making also extends to relevant stakeholder bodies such as Local Enterprise Partnerships, Local Nature Partnerships and infrastructure providers such as Highways England and the Environment Agency.
- 5.3.** The JCS, through the need for an immediate review, already identifies the need to work with Stroud over the issue of the housing shortfall for Gloucester. Similar joint working is also taking place with Wychavon District Council in Worcestershire on a cross-boundary site at Mitton to help meet the needs of Tewkesbury Borough. The JCS Review needs to engage with the reviews of the South Worcestershire Development Plan and Stroud Local Plan, which are currently underway, to continue to address any strategic issues. There is also need for continued joint working across the wider county to include all authorities (Cotswolds District Council and the Forest of Dean District Council) as well as Gloucestershire County Council.
- 5.4.** The Gloucestershire Local Enterprise Partnership (LEP) is currently preparing the Industrial Strategy for economic growth in the county and the JCS will have an important role in delivering this.



Question 5

What are the duty to cooperate issues that the JCS review will need to consider?

6. Vision, aims, objectives and issues

6.1. The JCS sets out the vision and objectives for the area as well as setting out the key issues and opportunities for the three authority areas.

6.2. The current JCS is as follows:

By 2031 Gloucester City, Cheltenham Borough and Tewkesbury Borough will have continued to develop as highly attractive and accessible places in which to live, work and socialise. The Joint Core Strategy area will be recognised nationally as enjoying a vibrant, competitive economy with increased job opportunities and a strong reputation for being an attractive place in which to invest. The character and identity of individual communities will have been retained while improved access to housing will have addressed the needs of young families, single people and the elderly.

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

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

6.3. The JCS describes some of the key challenges facing the area, including: an ageing population, the availability and affordability of housing, increasing and diversifying employment opportunities, pockets of deprivation, traffic congestions, climate change and the need to protect our natural environment.

6.4. The JCS then sets out eight strategic objectives to support and deliver the vision and address these challenges. These are:

- Objective 1 – Building a strong and competitive urban economy
- Objective 2 – Ensuring vitality of town centres
- Objective 3 – Supporting a prosperous rural economy
- Objective 4 – Conserving and enhancing the environment
- Objective 5 – Delivering excellent design in new development
- Objective 6 – Meeting the challenges of climate change
- Objective 7 – Delivering a wide choice of quality homes
- Objective 8 – Promoting healthy communities



Question 6

Are the vision, key challenges and objectives identified in the JCS still relevant? Are there new key challenges the JCS review needs to consider?

7. Spatial strategy

- 7.1. The spatial strategy for the JCS is to focus development at Gloucester and Cheltenham to support their economic roles as the main providers of jobs, services and housing. A proportion of this growth is to be from development within the existing urban areas. However, as the growth for Gloucester and Cheltenham could not wholly be accommodated within their administrative areas, a number of strategic sites are located, wholly or partly, within Tewkesbury Borough. Tewkesbury's own needs are to be provided at Tewkesbury Town in line with its role as a market town as well as smaller-scale development at a number of 'Rural Service Centres' and 'Service Villages'.
- 7.2. Regardless of the scope or plan period that this review is to cover, there will be a need to consider the direction of future growth and the strategy required to meet requirements. The key options are presented below, however in isolation no option would be suitable and so the eventual spatial strategy, to be sustainable, will need to be a mix.

Urban focus

- 7.3. This option involves the concentration of development within urban areas, including the redevelopment of brownfield land. In this regard, sites within the main urban areas of Gloucester, Cheltenham and Tewkesbury, can make an important contribution to housing supply and support the vitality of the urban areas and any regeneration initiatives. However, there is a recognition that there will not be sufficient land within urban areas to fully meet development needs.

Urban extensions

- 7.4. Outside of the existing built up areas, urban extensions present the opportunity to provide new growth closest to where it is needed. This also benefits from the services and infrastructure at existing centres, maximising the potential for sustainable transport. This can also help to support the vitality and regeneration of existing centres. Providing large scale urban extensions also presents the opportunity for new on-site infrastructure, such as schools, local centres and green spaces that can bring benefits to the existing and new community. Delivering this approach inevitably necessitates the use of greenfield land on the edge of urban areas, which in the JCS area, could also mean the release of Green Belt land.



New settlement

- 7.5. This option would require the development of a new settlement in a suitable location in order to meet future development needs and could take the form of a new town or village or it could be developed around an existing smaller settlement. A new settlement would present the opportunity to plan a place from the beginning and provide infrastructure to support the new population. This option is likely to form part of a longer-term strategy and would involve the development of greenfield land in a more rural location and therefore would have a considerable impact on the landscape character of the area. Depending on the scale of development required and the issues in finding a sustainable location, this may require a wider sub-regional approach with other local authorities.

Rural dispersal

- 7.6. The dispersal of housing requirements across the JCS rural area would involve a greater number of the smaller villages each accommodating a proportion of development in order to meet the wider growth needs. This approach would have the benefit of providing greater housing choice and affordability in rural areas as well as helping to maintain and improve the vitality of rural communities and their economy. Most of the rural settlements are small-scale which means that developments of proportional significance are likely to be unsuitable in terms of landscape and village character.
- 7.7. It is likely that the most suitable spatial strategy will involve elements from a number of different options to provide the most sustainable and deliverable solution.



Question 7

Having regard to the spatial strategy and the options presented above, how do you think the JCS authorities can most sustainably deliver for our future development needs?

8. Housing growth

- 8.1. The JCS covers a 20 year period between 2011 and 2031. During this period 35,175 new homes are needed of which approximately 20,000 have already been built. Of the remainder, the majority have planning permission or are identified specific sites.
- 8.2. However, if the plan period is to be extended, it will be necessary to plan for the additional housing need this generates.
- 8.3. The Government has now published a standard approach to establishing the need for new homes for local authorities. This is a minimum figure and so a starting point. On top of this, it will be appropriate to consider whether there is a need for more homes, for example to help provide more affordable homes for the local community, or to provide for economic growth ambitions. The new homes requirements will come into force at the point of adoption of the JCS Review.
- 8.4. Based on the information available in early September 2018, the minimum requirement in the JCS area would be in the region of 1,780 new homes a year. In contrast, the current figure for the JCS area is approximately 1,760.
- 8.5. To support the review, the JCS authorities have sought advice from Neil McDonald, an independent advisor on housing demographics and a background paper to the consultation is available on the JCS website (under JCS Review).

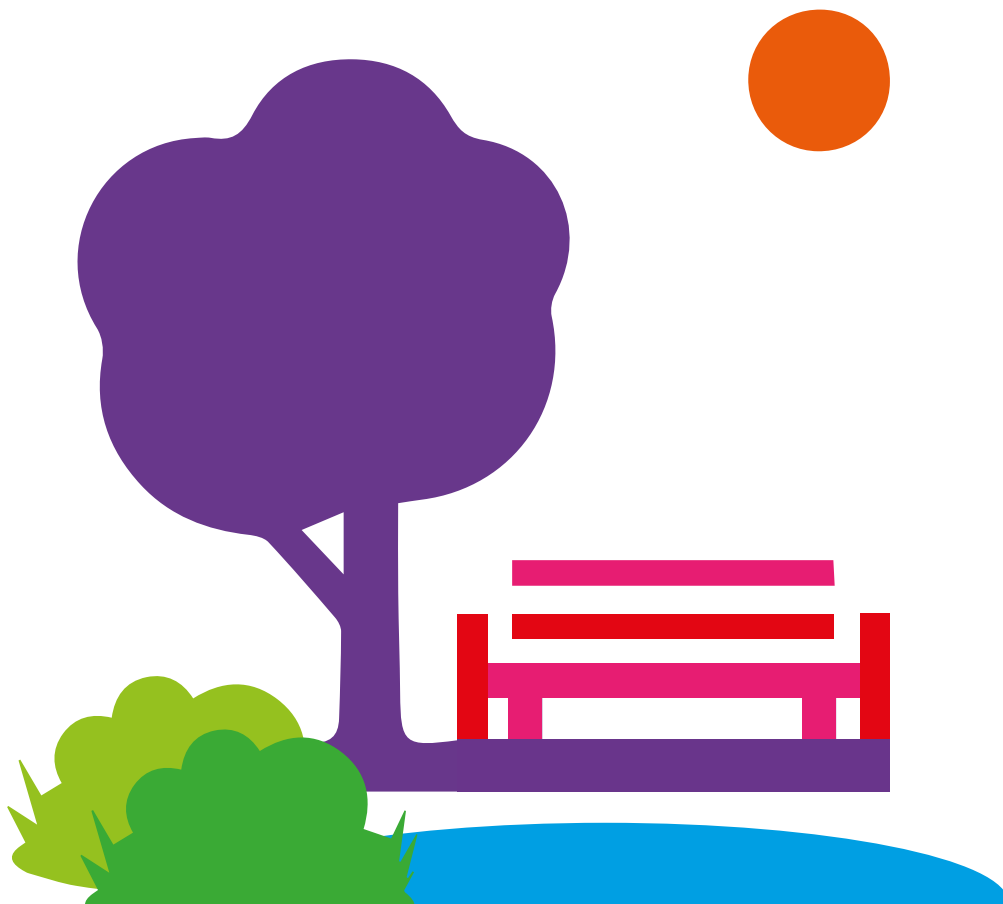


Question 8

Are there any justifications for departing from the Government's standard housing calculation methodology?

9. Housing type and tenure

- 9.1.** It is important that the JCS Review seeks to identify and deliver for the needs of all communities through different housing types and tenure.
- 9.2.** The NPPF (paragraph 61) states that “the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.” These groups include, but are not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes.
- 9.3.** The six Gloucestershire district authorities are currently working on a new Local Housing Needs Assessment (LHNA) – replacing the existing Strategic Housing Market Assessment (SHMA). This assessment will take into account the latest national guidance providing a robust evidence base around specific housing needs to produce appropriate policies to inform the JCS Review and will inform future rounds of consultation.



Question 9

Do you think that there any other specific forms of housing the JCS Review should seek to address?

10. Economic development

- 10.1.** The JCS employment strategy seeks to support the delivery of land and jobs in close proximity to the M5 corridor. This supports the Strategic Economic Plan (SEP) prepared by the Local Enterprise Partnership (LEP). It also supports a sustainable pattern of growth, providing both jobs and employment opportunities in close proximity to one another. The JCS allocates 192 hectares of employment land, both in the main urban areas and as part of some of the strategic allocations. This will support around 39,500 new jobs over the plan period, in traditional employment uses such as offices and manufacturing, but also areas like healthcare and hospitality.
- 10.2.** Extending the plan period will mean that new land will be required to support economic growth. At the same time it will be important to ensure that existing employment land is used in the best possible way in order to improve productivity and minimise the amount of land that is required elsewhere.
- 10.3.** The JCS authorities continue to be committed to the economic growth of Gloucestershire and it is important this is reflected in the JCS Review. Of particular importance will be the recently updated SEP as well as the emerging Gloucestershire Industrial Strategy, both being prepared by the LEP.
- 10.4.** As part of this consultation, the authorities are undertaking a 'call for sites' and invite landowners, developers and the community to submit sites for consideration. See section 12 for further information.



Question 10

There is going to be a need for sites to be identified for employment land. What types of employment land do you think are required in the JCS area to provide for the needs of different business sectors and where would it best be located?

11. Retail and city / town centres

- 11.1.** The JCS includes Policy SD2 'Retail and city / town centres'. This is a high level policy which sets out key principles for development involving main town centre uses (such as retail and leisure) and floorspace figures for the five main city / town centres.
- 11.2.** However, the JCS Inspector felt there were some shortcomings with this policy and required the authorities to undertake an immediate review. This process has already started, with the authorities commissioning consultants to prepare new evidence and strategies for all city and town centres in the JCS area, including the consideration of site allocations.
- 11.3.** At the same time, the role and function of city and town centres is changing as is the way that people are spending money. Over the past few years there have been many casualties on the high street, including Woolworths and BHS. Out-of-centre retailers have also struggled, including Toys r Us and Homebase.
- 11.4.** It is important that planning policies allow city and town centres to evolve, adapt to the challenges and be flexible to changing circumstances over time. Where there is a need for new floorspace for retail and other town centres uses, it is important it is planned as part of a coordinated strategy that supports city / town centres and does not undermine them.
- 11.5.** As part of this consultation, the authorities are undertaking a 'call for sites' and invite landowners, developers and the community to submit sites for consideration. See section 12 for further information.



Question 11

How can the JCS best plan for the changing nature of city and town centres to ensure they remain vital and viable in the future?

12. Sites

Known development opportunities

- 12.1.** At the point of adoption, the JCS had shortfalls of land to provide for new homes. For Gloucester City this is around 1,000 new homes from 2028 and for Tewkesbury 2,450 new homes from 2025.
- 12.2.** That being said, the JCS already identifies several strategic locations that offer the potential to help address this shortfall and the authorities have begun the process of reviewing these as potential strategic site opportunities.

Ashchurch

- 12.3.** It is noted in the adopted JCS that the housing shortfall for Tewkesbury was exacerbated by a decision during the examination process of the Defence Infrastructure Organisation (DIO) to stop the release of the MoD Ashchurch site, a proposed strategic allocation. However, the JCS sets out that there remains development potential in the wider Ashchurch area to help meet the housing requirements of the area and there was a commitment in the plan to continue to explore this.
- 12.4.** Tewkesbury Borough Council was successful in securing Homes England capacity funding to support the delivery of growth in the area both within and beyond the current JCS plan period. This work continues to explore the potential of the MoD land as well as other sites in the wider Ashchurch area.
- 12.5.** To take this forward, Tewkesbury Borough Council has commissioned strategic-scale master planning work for this area to provide a comprehensive assessment and approach to development potential which addresses key issues such as place making, transport infrastructure, community facilities, social and green infrastructure. This work is being undertaken to help inform the JCS Review.
- 12.6.** The Ashchurch area is of particular strategic importance in helping to meet the housing and employment needs. In terms of location, it holds an advantageous position next to M5 junction 9 giving it direct motorway access and so making it particularly attractive as an area of employment growth. It is also positioned around the 'Ashchurch for Tewkesbury' railway station, providing significant opportunities for sustainable transport movements.
- 12.7.** The 'Ashchurch Concept Masterplan' has been produced to show how future development could come forward in this area and is available on the JCS web-site (under JCS Review) as a background paper to this consultation.



North West and West Cheltenham

- 12.8.** The adopted JCS allocates two strategic allocations for housing and employment, on the west side of Cheltenham. These are the North West Cheltenham and West Cheltenham allocations and are expected to provide for at least 5,385 new homes and 55ha of B-class employment land. Significantly, the employment land at West Cheltenham will be centred on the provision of a new nationally important cyber security hub.
- 12.9.** In addition to these allocations, the JCS also identifies 'safeguarded land' adjacent to both sites that has been removed from the Green Belt and for longer term development needs beyond the current plan period. These areas of land therefore provide the primary opportunity for helping meet the growth requirements for Cheltenham. However, these sites need to be planned through a review in order for them to come forward. In addition to the safeguarded land, there are potentially other opportunities within the area that are currently within the Green Belt but which could provide further sustainable options for growth.
- 12.10.** Further development in this area would provide the opportunity to build on the development of the existing strategic allocations and take advantage of social and community infrastructure that is to be provided. At West Cheltenham, development beyond the current allocation would also help maximise the potential of the cyber security hub.
- 12.11.** In addition, the area is in a strategically important location being close to M5 junction 10. Transport modelling work undertaken to inform the JCS demonstrated that to deliver growth up to 2031, significant infrastructure improvements would be needed for the junction and surrounding routes. This including improving the junction to an 'all ways' giving access to/from the northbound and southbound directions of the M5. Not only are the improvements needed to deliver existing growth, they provide an opportunity to examine the further potential of this area, particularly from an employment perspective. This further potential growth has, to date, not been modelled but it is proposed to do this early in the plan revision process.
- 12.12.** Further development in this area to the west of Cheltenham will only serve to increase the viability of new infrastructure that would benefit the whole JCS area.
- 12.13.** The 'Cyber Central Vision' has been produced to support this development opportunity and is available on the JCS web-site (under JCS Review) as a background paper to this consultation.

South Gloucester

- 12.14.** The JCS acknowledges the importance of Stroud District as an authority adjoining Gloucester City that could help address the requirement for new homes where reasonable to do and consistent with achieving sustainable development. With this in mind, the emerging Stroud Local Plan Review has identified sites south of Gloucester City as potential development opportunities and these will be considered further, along with other potential opportunities, as the JCS Review and Stroud Local Plan Review progress.

Other development opportunities

- 12.15.** The JCS allocates a number of strategic-scale sites to help meet the needs for housing and employment up to 2031. In order to be able to deliver additional growth over a longer plan period there will be a requirement to allocate further strategic sites through the JCS.
- 12.16.** The JCS authorities already maintain a Strategic Assessment of Land Availability on an annual basis which provides a starting point for considering what sites may be suitable, available and achievable for development. However, through this consultation a 'call for sites' is being undertaken whereby developers, landowners and the community are asked to submit land that is available for development to be considered as part of the review.
- 12.17.** The JCS Review will consider the allocation of strategic scale sites with the district-level plans allocating the smaller-scale non-strategic sites.
- 12.18.** The NPPF seeks for a greater range of housing site sizes to be delivered through local plans and particularly recognises the role that small and medium sized sites can have. In this regard it states that local planning authorities should, where achievable, identify through the development plan land to accommodate at least 10% of their housing requirement on sites of no larger than one hectare (sites on 1 hectare can generally accommodate 20-30 houses in rural areas with greater densities in urban areas). The JCS Review will also need to consider the strategy for meeting this requirement and whether it is achievable and whether it is best to continue to deliver small sites through district level plans.



Question 12

Having regard to development needs in the JCS area and the spatial strategy discussed, do you feel that the known development opportunities can play a role in helping to meet needs?



Question 13

Do you have a site you would like considered for inclusion in the Local Plans? You will need to provide a completed form with information about the site including a site plan.



Question 14

What do you think is an appropriate definition for a 'strategic site' in terms of for example size, location and proposed use?

13. Infrastructure

- 13.1.** The provision of sufficient infrastructure is essential to support both existing and new communities and key to a successful local economy. Infrastructure is a wide term and can cover whole range of different items – from highways improvements, sustainable transport routes, schools, healthcare facilities and high speed broadband, through to open spaces, playing fields and green infrastructure. The type and scale of infrastructure needed will depend on the scale and pattern of development and is closely linked to the spatial strategy for the area.
- 13.2.** The JCS Infrastructure Delivery Plan sets out the anticipated infrastructure requirements for the area up to 2031. This will be revised as part of the review.
- 13.3.** Green infrastructure is an important part of maintaining and improving the natural environment of the area and the adopted JCS is supported by a Green Infrastructure Strategy. New development should make a positive contribution to green infrastructure and help provide new and improved open spaces for communities. The JCS authorities must work with neighbouring authorities and the Gloucestershire Local Nature Partnership to ensure an appropriate joined up approach.
- 13.4.** Supporting health and wellbeing and active lifestyles more generally is really important. It implies providing communities with the best opportunity to live healthy lifestyles, both physically and mentally, including access to health and community facilities, desirable routes for walking and cycling, and opportunities to meet and interact with people and nature.
- 13.5.** In thinking about the future infrastructure needs of the area it is important to consider technological advancements. The infrastructure required in the future could be very different from today. Technology such as electric vehicles, driverless cars, renewable energy and internet-based communications and commerce could have a significant influence on the planning and design of new development.



Question 15

Are there any infrastructure needs that the JCS Review needs to consider?

14. Next steps

- 14.1.** This Issues and Options consultation is the first step in preparing the JCS Review. Consultees are asked to respond to the key questions by 5pm on Friday 11th January 2018.
- 14.2.** Once the consultation is closed, the authorities will review all responses duly received and begin the preparation of the next stage the 'JCS Draft Plan'. This is currently scheduled for Autumn 2019.





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