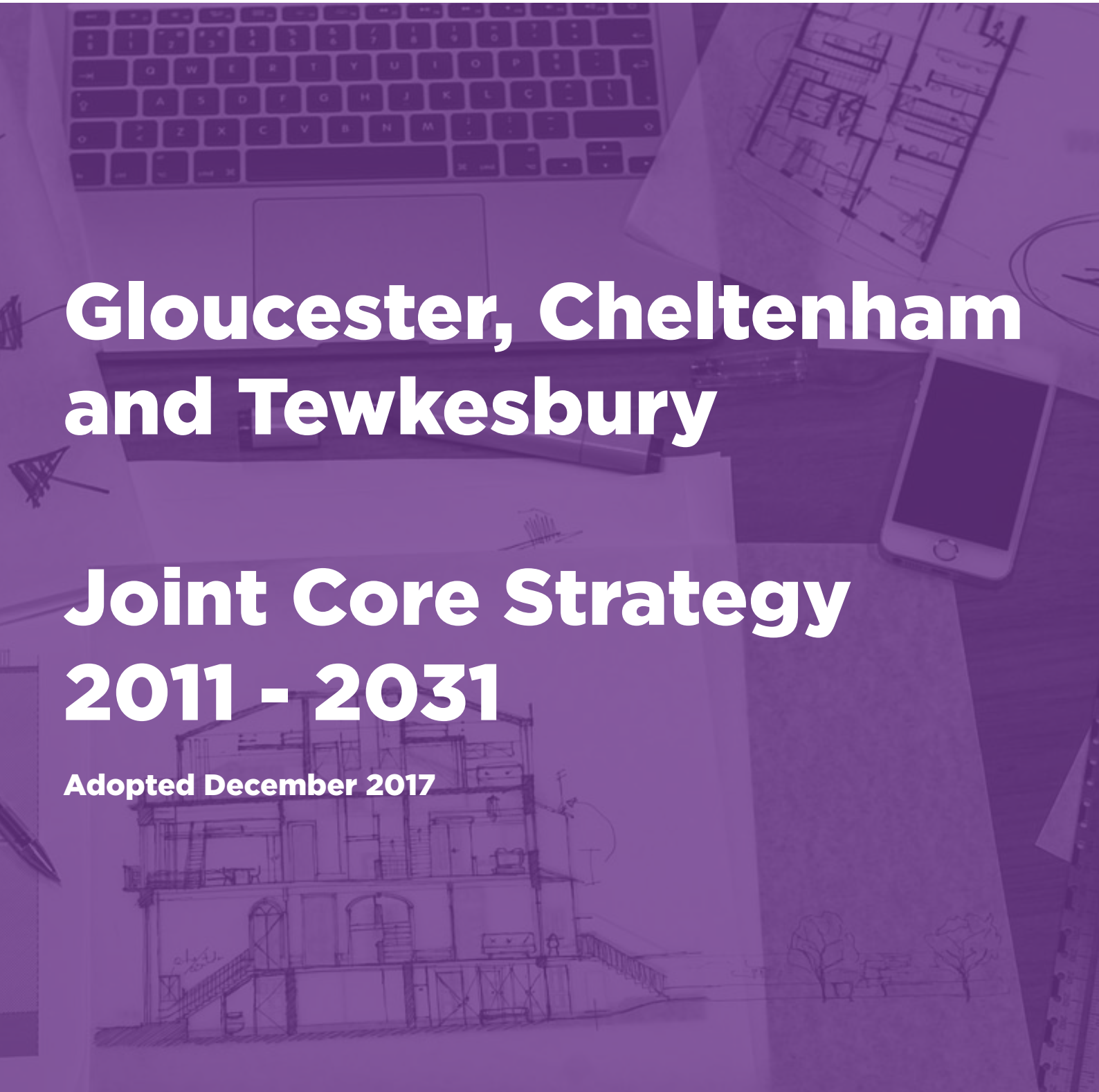


# **JCS**

## **Joint Core Strategy**



# **Gloucester, Cheltenham and Tewkesbury**

# **Joint Core Strategy 2011 - 2031**

**Adopted December 2017**

# Foreword



**Welcome to the adopted Joint Core Strategy (JCS) of the three Councils: Gloucester City, Cheltenham Borough and Tewkesbury Borough.**

**As the centre of Gloucestershire for economic development, it is vital to have an up to date development plan for the area and after a rigorous process of preparation, consultation and examination, the JCS was adopted on 11 December 2017.**

**The JCS sets out the amount of new homes, jobs and supporting infrastructure that is needed to 2031 and details the strategy for how this development is to be delivered in a managed and resilient way whilst protecting our exceptional natural and built environment.**

**This adopted plan has been shaped by the thousands of responses received at earlier stages of the project and we wish to thank those residents, community groups, businesses and service providers who all helped to create the plan and we ask that everyone continues to work together to deliver the JCS and its aims.**



Paul James



Steve Jordan



Dave Waters

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# PART 1

## - Introduction

### **‘The purpose of planning is to help achieve sustainable development...’**

**1.1 In addition to the quote above, the ministerial foreword to the National Planning Policy Framework (NPPF) says:**

*‘Sustainable means ensuring that better lives for ourselves don’t mean worse lives for future generations.’*

*Development means growth. We must accommodate the new ways by which we will earn our living in a competitive world. We must house a rising population, which is living longer and wants to make new choices. We must respond to the changes that new technologies offer us. Our lives, and the places in which we live, can be better, but they will certainly be worse if things stagnate.*

*Sustainable development is about change for the better, and not only in our built environment.*

*Our natural environment is essential to our wellbeing, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature – and opened to people to experience it, to the benefit of body and soul.*

*Our historic environment – buildings, landscapes, towns and villages – can better be cherished if their spirit of place thrives, rather than withers. Our standards of design can be so much higher. We are a nation renowned worldwide for creative excellence, yet, at home, confidence in development itself has been eroded by the too frequent experience of mediocrity.*

*So sustainable development is about positive growth – making economic, environmental and social progress for this and future generations.*

*The planning system is about helping to make this happen.’*

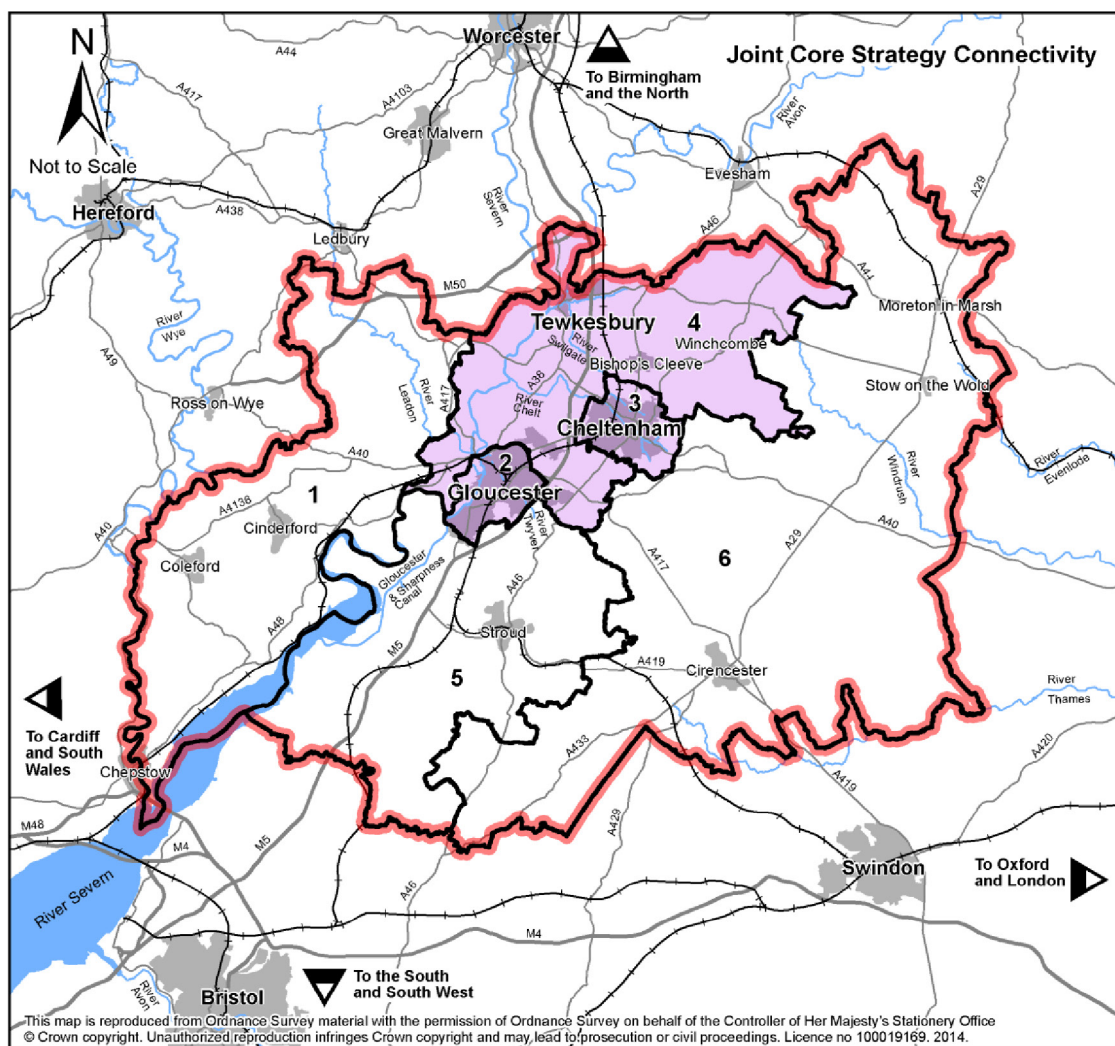
**1.2** A key component in ‘helping to make this happen’ are development plan documents prepared by the Local Planning Authority. In a plan-led system, planning applications are required to be determined in accordance with the development plan unless material planning considerations indicate otherwise. In fulfilling this critical role, it is clearly important that the development plan is up-to-date and backed by sound evidence so that its policies can be relied upon by stakeholders and decision-takers.

#### ***What is the Joint Core Strategy? (JCS)***

**1.3** The JCS is an important part of the development plan for Gloucester City, Cheltenham Borough and Tewkesbury Borough and covers the area shown on the map on page 5. As a planning document, which looks to reflect the priorities of government, residents, businesses, local service providers and other stakeholders, the JCS has been prepared within the context of national policy and having regard to the diverse aspirations and local characteristics that make up the area.

**1.4** The JCS sets out the long-term vision and objectives for the area together with strategic policies for shaping new development and locations for new development up to 2031. Together, these policies help to provide a strategic planning framework for the JCS area, which guides future planning decisions and helps to achieve the overall vision for the area.

**1.5** Whilst the JCS provides the higher level or strategic part of the development plan for the area, more detailed, locally-specific planning policies will be set out in the Gloucester City Plan, Cheltenham Plan and Tewkesbury Borough Plan, collectively called District plans. These will include local allocations of land for development and local policies to guide decisions on planning applications. They also form part of the development plan and will need to reflect and be consistent with the policies in the JCS as set out in the diagram on page 8.



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- Key**
- Joint Core Strategy Area
  - Administrative Boundaries
  - 1 - Forest of Dean District
  - 2 - Gloucester Borough
  - 3 - Cheltenham Borough
  - 4 - Tewkesbury Borough
  - 5 - Stroud District
  - 6 - Cotswold District
  - County of Gloucestershire Boundary
  - Roads
  - Railways
  - Waterways

# The Development Plan



- 1.6** The same applies to neighbourhood plans. Where a parish or other designated community wishes to prepare a neighbourhood plan for their area, it must be in general conformity with strategic policies in the development plan documents. Whilst neighbourhood plans can promote more development than is set out in the JCS or district plans, they cannot be used to stop new development proposed in other development plan documents (DPDs).
- The JCS authorities will work with town and parish councils and community groups to provide advice in producing neighbourhood plans.
- 1.7** Saved policies in the City and Borough Plans that remain as part of the development plan beyond the adoption of the JCS are provided at Appendix 1. In time these will be replaced by policies in the new District plans.
- 1.8** More information on the documents that each of the local authorities is preparing is available on the websites of Gloucester City, Cheltenham Borough and Tewkesbury Borough councils.
- 1.9** In accordance with the Town and Country Planning (Local Planning) England Regulations 2012, the maps accompanying this document illustrate geographically the application of policies.

# PART 2

## - Vision & Objectives



- 2.1** Having considered the key challenges for the JCS area, established through earlier consultations, a vision has developed which sets out what type of place the JCS area will be by 2031 (the end date of the JCS).

The starting point for the JCS vision was the three Sustainable Community Strategy visions already identified through community consultation.

### *The Gloucester City Vision 2012-2022*

- 2.2** Gloucester will be a flourishing, modern and ambitious City, which all residents can enjoy. We will work to encourage sustainable economic growth for the City's expanding population by driving forward its regeneration programme. This will strengthen the City, particularly its centre and make the most of our infrastructure.

### *Cheltenham Sustainable Community Strategy Vision 2008-2028*

- 2.3** We want Cheltenham to deliver a sustainable quality of life, where people, families, their communities and businesses thrive, and in a way which cherishes our cultural and natural heritage, reduces our impact on climate change and does not compromise the quality of life of present and future generations.

### *Tewkesbury Sustainable Community Strategy Vision 2008-2028*

- 2.4** A borough of healthy, strong, thriving and sustainable communities, both rural and urban, where people want to live, work and visit.
- 2.5** The JCS vision has been further refined through engagement and discussion with stakeholders, the JCS Sustainability Appraisal and the JCS evidence base, including extensive public consultation. Whilst being aspirational, the vision for the JCS area is deliverable and seeks to bring forward change in a manner that reflects what is important to Gloucester, Cheltenham and Tewkesbury and their communities.

# Vision

***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.***

## Area descriptions

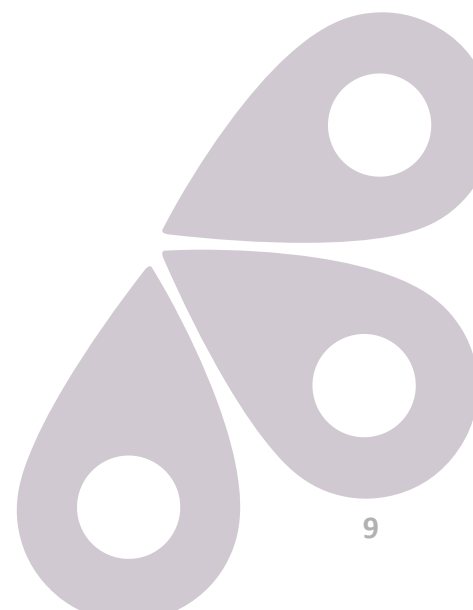
### What does the vision mean for Gloucester City and adjoining communities?

- 2.6** The historic cathedral City of Gloucester is the county town for Gloucestershire. It is bordered by the flood plains of the River Severn and the Gloucester and Sharpness Canal to the west, the motorway and rising land to the east and south, linking into the Cotswolds Area of Outstanding Natural Beauty (AONB), and agricultural land to the north and east. Robinswood Hill and Churchdown Hill form two local landmarks. The City is a growing and transforming place and is delivering an ambitious regeneration programme with the overall aim of revitalising the City and its centre.
- 2.7** 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, shopping and leisure experience, combined with improved pedestrian, cycle and public transport improvements, including the new bus station. A vital and viable City centre will have raised Gloucester's profile as a strong, well-connected
- and resilient location where people will be proud to live and work in the economic and administrative capital of Gloucestershire.
- 2.8** However, there is limited capacity to accommodate all these competing development objectives within the urban area. Consequently, some peripheral development is needed to achieve these.
- 2.9** New high-quality business parks will be developed to retain and attract investment, thereby supporting the economic resilience of Gloucester City and the surrounding area.
- 2.10** The waterfront will be embraced, reinforcing links between the river and canal, regeneration areas and the City centre and raising the profile of its architectural history and Roman origins. In turn, this will improve investor confidence and tourist appeal. Its links with the A40 corridor and with Cheltenham will be used to support the potential of the City to attract investors and visitors alike.
- 2.11** Gloucester's natural environment will continue to be safeguarded and improved, particularly through the protection and enhancement of landscape features and key habitats within the City's boundary, such as Robinswood Hill and adjacent to it at Chosen Hill.



## *What does the vision mean for Cheltenham Borough and adjoining communities?*

- 2.12** Cheltenham's development pattern is encompassed on all sides by the Cotswolds AONB and Green Belt. Within the borough are a number of villages such as Prestbury, Leckhampton, Charlton Kings and Swindon Village which, although significantly influenced by the expansion of Cheltenham, retain their own character and 'village' feel. The town is characterised by its high-quality historic environment, set within a formal garden townscape and a wider open landscape, defined by the Cotswolds AONB and the Green Belt. This is effective in delineating Cheltenham from the neighbouring City of Gloucester and the settlement of Bishop's Cleeve. Public consultation has emphasised the importance of retaining the separation of Cheltenham and protecting the qualities which make the borough unique.
- 2.13** Cheltenham will continue to follow the principles that has seen it referred to as 'a town within a park', retaining its Regency character, tree-lined promenades and streets, and attractive green spaces and squares, while creating contemporary, new developments.
- 2.14** The town itself will continue to be a sub-regional focal point for economic and cultural activity and, therefore, it is important that the borough makes provision for affordable housing, jobs, infrastructure and facilities over the next 20 years to support mixed and balanced communities and attract inward investment.
- 2.15** However, there is limited capacity to accommodate all these competing development objectives within the urban area. Consequently, some peripheral development is needed.
- 2.16** The borough has an ageing stock of employment sites and in recent times companies have relocated away from the area. This could be addressed through the provision of high-quality, modern premises both in the town centre and in the form of a number of appropriate-scale business parks elsewhere in the borough in order to retain and attract investment, thereby supporting the economic resilience of Cheltenham and the wider JCS area.
- 2.17** Retail and tourism will continue to make a major contribution to Cheltenham's economy. In order to ensure this, Cheltenham Development Task Force will deliver new sites through the redevelopment of North Place and Royal Well, improving links with the Lower High Street, Brewery and Montpellier shopping areas. The Cheltenham Development Task Force has been working extensively with Network Rail and Great Western Railways to improve the Cheltenham Spa station, a station that is the busiest in the County with in excess of 2m passenger movements per year. The scheme is made up of a series of components including improved cycling & pedestrian access, access for all upgrades, decked car parking and improved bus / taxi / private vehicle interchange; the latter funded through GFirst LEP. The total value of the scheme will be around £5m which will be triggered after Network Rail have completed the extension to the northbound platform in 2017 to allow for the new inter-city express trains that come into service in 2018. This will build capacity, along with further improvements as the Strategic Allocations at West and North West Cheltenham are built out.



## *What does the vision mean for Tewkesbury Borough?*

- 2.18** Tewkesbury is an attractive rural market town with a significant number of heritage assets and a high-quality historic environment.
- It forms part of a wider-related area incorporating Northway, Ashchurch and Wheatpieces. Tewkesbury town lies at the confluence of the Severn and Avon rivers, and these riversides offer great potential as a leisure destination and in attracting investment. Much of the remainder of Tewkesbury Borough is largely rural in character with over half of the population living in rural settlements (including market towns and villages) and hamlets / individual dwellings in the countryside. There are also significant areas of the borough which lie at the urban fringes of both Gloucester and Cheltenham.
- 2.19** The borough's landscape is diverse, ranging from the largely flat Severn Vale to the wooded slopes of the AONB bordering Cotswolds District to suburban development around the fringes of Cheltenham and Gloucester, as well as Tewkesbury town itself. Much of the western part of the borough is in an area at high risk of flooding.
- 2.20** By 2031, Tewkesbury town and its wider area will be a key location for significant housing and economic growth and will have strengthened its role as a desirable place to live and work, and will continue to be a popular visitor destination. The town will enjoy a strong reputation across the county and further afield, with unique attractions and thriving day and night-time economies fulfilling a role that complements larger nearby centres and supports the rural borough.
- 2.21** The Tewkesbury town Centre Masterplan will look to deliver the redevelopment of key sites across the town centre, and a clear move to embrace Tewkesbury town's unique riverside location will be the catalyst for such changes. It may also offer opportunities for improved flood mitigation schemes to reduce the impact of future flooding events on the town.
- 2.22** Additional high-quality business development will retain and attract investment, thereby supporting the economic resilience of Tewkesbury town and the surrounding area. All development in the area will recognise the importance and prevalence of flooding issues in the area, reducing the regularity and severity of such risks as far as is practicably possible.
- 2.23** The character of the rural area will be protected and enhanced. Opportunities for farm diversification for employment or rural tourism can further support the rural economy and will be encouraged. There are existing pockets of rural deprivation, partly the result of isolation from key services or employment opportunities. These issues will be addressed through the conversion of vacant and derelict premises, development of appropriate-scale businesses and better broadband provision. Additional housing will help to support existing and new services in rural areas and help to improve self-sufficiency of rural settlements.
- 2.24** Public transport will be improved, particularly the access between the larger rural settlements and the main urban areas. The role of Ashchurch for Tewkesbury railway station will be enhanced to provide good quality services and facilities to serve the area.
- 2.25** By 2031, the rural areas will be prosperous and playing their part in the economy of the JCS area. Rural communities will be vibrant and not simply dormitories for the urban areas, with good access to services and availability of affordable housing. In addition to any special provision through a Green Infrastructure Strategy, distinctive landscape character will have been protected, landscape features maintained and enhanced, and the countryside will be richer in wildlife with improved access for all. The tranquillity of the countryside will have been safeguarded, and noise and light pollution minimised. New development will be appropriate in scale, design and energy efficiency. The Green Belt will be managed to enhance its contribution to the landscape, biodiversity and access.
- 2.26** Areas of the borough which lie at the edges of Gloucester and Cheltenham will play an important role in accommodating development through urban extensions.

## Key challenges

- 2.27** The overall trend for the JCS area is towards an ageing population. This reflects a national trend but is more pronounced in this area due to migration of pensioners from other parts of the country. This raises challenges in the provision of appropriate health and transport services, combined with a shrinking workforce as well as a reduction in average household size. Across the JCS area, evidence has shown that there is currently a net outflow of young people (aged 15-29 years), which is weakening the potential of the local workforce and making it a less attractive area for businesses. Against this trend, Gloucester City is expected to see a significant rise in the young and working-age population. To maintain a thriving economy and remain an attractive area for business, the number of dwellings and jobs needs to be more closely aligned.
- 2.28** The JCS addresses the needs of an increasing elderly population, coupled with natural growth in the existing population and shrinking household sizes (due to more single households, more lone parents and smaller families). This may mean that some young people move away or live with their parents into their 30s, while older people remain in unsuitable housing which does not meet their needs. Hence, the housing evidence has identified a need of around 1,759 new homes per year which needs to be accommodated in the JCS area over the next 20 years to provide adequate housing for its residents.
- 2.29** For young people the key issue in the area is not just the availability of housing, but also the price of housing. In the JCS area, the house price to earnings ratio is around 6:1 for people aged under 40 in 2011 (meaning the average house price is six times the average annual income of people under 40). There has been insufficient delivery of housing in recent years to lower this ratio. Whilst over 8,266 new homes have been delivered in the JCS area between 2006 and 2011, only 2,015 of these were affordable. That equates to about 400 new affordable homes per year. Housing need in both the rural and urban areas remains a pressing issue.
- 2.30** The largest employment sector is public administration, with other important sectors being tourism and finance. Diversifying the employment base to increase the number of knowledge-based jobs remains a key challenge for the area. Unemployment levels have been rising in the county since May 2008 with widespread impacts on almost all sections of the local economy. Since the 2007 recession, vacancy rates of shops have increased in both larger and smaller centres. Furthermore, there are now high numbers of young people aged 16-18 years who are not in education, training or employment. All of this indicates a need for more employment and training opportunities so that the JCS area will remain a competitive location, providing companies with the opportunity to move or expand within the area and supporting young people entering the workforce.
- 2.31** While the JCS area is considered to be relatively affluent, this is not uniform across the area. There are pockets of deprivation including eight of the most deprived wards in England, which suffer from low incomes, unemployment, poor health and housing, low educational attainment, and crime and disorder. Tackling levels of deprivation through measures such as more frequent public transport and better community and health facilities remains a pressing issue.
- 2.32** 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 is easier to achieve in the major urban areas which are compact and thus offer potential for improvements to public transport, local cycling and pedestrian links. However, in the rural areas, maintaining and improving public transport is more challenging.
- 2.33** 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.

**2.34** 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.

**2.35** Climate change and its local manifestation of more frequent and more severe flooding is also a major issue in the JCS area as much of the area is low-lying and a significant proportion of existing residential properties are already at risk of flooding. Identifying new sites for development outside areas liable to flooding, and improving resilience to flooding of existing areas, is another key challenge of the plan.

### *Strategic objectives*

**2.36** To support and deliver the vision, the JCS sets out the following objectives. The aim is to achieve a sustainable balance that responds to the key challenges identified above and meets the overall needs of the JCS area.

**2.37** A number of strategic objectives, closely aligned with the ambitions of the Sustainable Community Strategies, were put forward in previous consultation documents.

Following the publication of the NPPF, the headings of the objectives were amended, and the objectives themselves have been refined following public consultation. Their impact on the environment, community and the economy has been tested through the Sustainability Appraisal process.

**2.38** The objectives do not repeat national planning guidance which will be applied as a matter of course, but have identified spatial issues of local importance. Each policy specifies the objectives to which it is contributing.

# Ambition 1 – A thriving economy

## **Strategic Objective 1 – Building a strong and competitive urban economy**

**Develop the potential of the JCS area for further economic and commercial investment by:**

- Providing the right conditions and sufficient land in appropriate locations to support existing businesses and attract new ones, particularly from the major high-tech and knowledge-based industries, tourism, retail and the leisure sector, to rebalance the local economy away from its public sector dominance, improve the area's economic resilience, support a highly-skilled workforce and continue to provide a focus for economic growth within the county;
- Providing the right environment, in partnership with others such as the Local Enterprise Partnership (LEP), for business start-ups, entrepreneurship and the improvement and expansion of education and training facilities to develop the skills employers need;
- Developing the area's role as a tourist destination, building on the unique characteristics and festival culture that already exist in the JCS area;
- 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.

## **Strategic Objective 2 – Ensuring vitality of town centres**

**Create the conditions for maintaining and strengthening a balanced hierarchy and network of city, town and district centres by:**

- Providing for sufficient retail, leisure, employment, social, cultural, tourist and other appropriate uses within the designated centres, to improve their vitality and viability, supporting accessibility and environmental improvements and town centre regeneration measures;
- Prioritising the delivery of key regeneration sites;
- Supporting a diverse retail offer across the three main designated centres of Gloucester, Cheltenham and Tewkesbury to complement each other and thereby increase competitiveness with centres outside the JCS area.

## **Strategic Objective 3 – Supporting a prosperous rural economy**

**Facilitate rural employment generation and diversification by:**

- Supporting the needs of agricultural businesses, encouraging farm diversification, the development of small rural business units, the conversion of existing buildings for rural business use, appropriate expansion of existing businesses and home working;
- Supporting and safeguarding, in partnership with others, the provision and retention of village shops that serve the everyday needs of a local community.

## **Ambition 2 – A sustainable natural, built and historic environment**

### **Strategic Objective 4 – Conserving and enhancing the environment**

**Ensure that planning policy and decisions:**

- Protect and enhance the JCS area's unique historic environment, archaeological heritage and geological assets;
- Conserve, manage and enhance the area's unique natural environment and great biodiversity, including its waterways, Sites of Special Scientific Interest (SSSI), the Cotswolds AONB, and areas of landscape and biodiversity importance, and maximise the opportunities to use land to manage flood water;
- Require that all new developments, wherever possible, supports green infrastructure and improves existing green infrastructure within urban and rural areas to provide movement corridors for people and wildlife;
- Within the Development Plan, review the current Green Belt boundary with a view to releasing land to help meet the long-term development needs of the area that cannot be accommodated elsewhere, whilst providing a long-term permanent boundary for the future.

### **Strategic Objective 5 – Delivering excellent design in new development**

**Ensure that all new developments are valued by residents by:**

- Integrating them well with existing communities and providing well-located infrastructure which meets the needs of residents;
- Creating a strong sense of place through high quality and inclusive design that respects and enhances local distinctiveness.

### **Strategic Objective 6 – Meeting the challenges of climate change**

**Make the fullest contribution possible to the mitigation of, and adaptation to, climate change and the transition to a low-carbon economy, by:**

- Making the best use of land by maximising the use of previously-developed land and encouraging higher-density developments in central locations, whilst promoting food security by protecting the highest-grade agricultural land and allotments;
- Reducing the use of fossil fuels by increasing self-containment of settlements through mixed-use developments and providing new developments in sustainable locations;
- In partnership with others, promoting the efficient use of natural resources, the re-use and recycling of resources, the production and consumption of renewable energy and the decentralisation of energy generation;
- Encouraging and facilitating low and zero-carbon energy development and the implementation of Sustainable Drainage Systems (SuDS);
- Ensuring that new development is located in areas which are not liable to flooding, that existing infrastructure is adequately protected from the threat of flooding, and that existing flood defences are protected and enhanced.

# Ambition 3 - A healthy, safe and inclusive community

## Strategic Objective 7 – Promoting sustainable transport

Reduce the need to travel and the reliance on the car by:

- Improving opportunities for public transport, walking and cycling by making routes more convenient, safe and attractive;
- Improving existing and providing new frequent public transport links and safe walking and cycling routes in all new developments;
- Improving access to services in rural and urban areas through new development, improved integrated transport links and supporting local and community led transport initiatives in the Local Transport Plan throughout the JCS area;
- Promoting bus priority on key public transport corridors identified in the Local Transport Plan throughout the JCS area.

## Strategic Objective 8 – Delivering a wide choice of quality homes

Deliver good-quality new housing to meet the needs of the current and future population and ensure greater affordability for all sectors of the community by:

- Delivering, at least, a sufficient number of market and affordable houses;
- Delivering residential developments that are supported by the necessary transport, community and social infrastructure, such as schools, open space, playing pitches and health facilities;
- Delivering housing of the right size, type and tenure to ensure the creation of mixed communities located in sustainable locations with good access to jobs and services;
- Meeting the housing needs of all age groups, vulnerable groups, and Gypsies, Travellers and Travelling Showpeople.

## Strategic Objective 9 – Promoting healthy communities

Promote development that contributes to a healthy population by:

- Providing for good access to the countryside and all open spaces through the retention and development of a comprehensive green infrastructure network;
- In partnership with others, creating stronger communities by reducing inequality and social exclusion, enhancing opportunities for high quality education, and thereby increasing social well-being;
- In partnership with others, encouraging healthy lifestyles and a well society through access to key community facilities and services, including sport, recreation and leisure facilities, open spaces and sustainable transport, including public transport
- Ensuring that environmental quality and air quality is protected.



# PART 3

## - The JCS Spatial Strategy



- 3.1.1** This part sets out key 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 SD1 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.

### SP1 - THE NEED FOR NEW DEVELOPMENT

#### *Background*

- 3.1.2** The issue of how much development will be needed in the JCS area until 2031 has generated considerable debate. The NPPF defines this requirement as ‘objectively assessed need’ (OAN). This is an assessment of need for new housing based on evidence including the demands derived from the local economy.
- It goes on to say that, when plan-making, councils should use their evidence base to ensure that their plans meet the *‘full, objectively assessed needs for market and affordable housing in the housing market area as far as is consistent with the policies set out in this framework’*.
- 3.1.3** One of the biggest challenges facing the JCS authorities is to accommodate the level of growth the area is likely to need in terms of housing, employment and infrastructure, whilst continuing to protect the natural and built environment that makes this area such an attractive place to live and work. This requires a balance to be struck between protecting these cherished assets, whilst ensuring that existing and future generations are able to form households, find work and make a valuable contribution to a strong community.
- 3.1.5** The plan must be based on up-to-date evidence. The OAN for the JCS has been independently assessed by consultants Nathaniel Lichfield & Partners (NLP) and the Cambridge Centre for Housing and Planning Research (CCHPR). In considering this evidence, the JCS authorities have concluded that the OAN for the JCS area is 33,500 dwellings and a minimum of 192 hectares of B-class employment land to support approximately 39,500 new jobs. This level of development would reflect both demographic and economic projections and aspirations, and is considered to be a sensible assessment of both the future housing needs and the economic potential of the JCS area.
- 3.1.4** The NPPF sets out that planning should *‘proactively drive and support sustainable economic development to deliver the housing, businesses and industrial units that the country needs’* and that *‘every effort should be made objectively to identify and then meet the housing, business and other development needs of the area.’*
- 3.1.6** Through the examination of the plan, the Inspector 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.



**3.1.7** The requirements set out in Policy SP1 reflect the evidence and take into account the following key issues:

- Population growth and changing household size;
- The effect of, and prospects for, economic growth;
- The dynamics of the local housing market;
- Landscape and environmental constraints;
- Infrastructure capacity and deliverability;
- Role and function of the Green Belt;
- The duty to cooperate across local authority boundaries.

## Policy SP1: The Need for New Development

- 1. During the plan period, provision will be made to meet the need for approximately 35,175 new homes and a minimum of 192 hectares of B-class employment land to support approximately 39,500 new jobs**
- 2. This is to be delivered by development within existing urban areas through District plans, existing commitments, urban extensions to Cheltenham and Gloucester, and the provision of Strategic Allocations at Ashchurch. This strategy aims to locate jobs near to the economically active population, increasing sustainability, and reducing out-commuting thereby reducing carbon emissions from unsustainable car use**
- 3. The housing requirement for each local authority will be as follows:**
  - i. Gloucester at least 14,359 new homes;**
  - ii. Cheltenham at least 10,917 new homes;**
  - iii. Tewkesbury at least 9,899 new homes.**

***This policy contributes towards achieving Objectives 1, 2, 3, 6, 7 and 8.***

### Explanation

**3.1.8** 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.

**Table SP1a Demographic housing needs in the JCS**

	Gloucester	Cheltenham	Tewkesbury	JCS
Demographic OAN 2011-31	13,290	9,900	8,640	31,830

- 3.1.9** 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.
- 3.1.10** In May 2016 the 2014 sub-national population projections were issued, as were the 2014-based household projections in July 2016. However, following review of this data (EXAM 263) it is considered that neither affects the housing need in the JCS. This is because the JCS housing needs have been employment led and the new demographic and household forecasts do not affect the number of homes needed to house the workforce required to support the projected job growth.
- 3.1.11** With regard to employment, it is important that the JCS reflects the spirit of the NPPF in helping to ensure that the ‘planning system does everything it can to support sustainable economic growth’. Local employment need has been independently assessed by consultants NLP to provide a robust analysis of employment potential in the area to ensure that the 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.
- 3.1.12** 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.
- 3.1.13** Economic growth has been planned for at the JCS-wide level as a functioning economic area. The LEP strategy for economic growth, as set out in the Strategic Economic Plan, is focused on the M5 growth corridor running through the heart of the JCS area and not any particular authority. Therefore economic growth needs to be seen in the JCS area-wide context. This is a different approach from housing where each district has its own specifically assessed needs and requirements. Therefore, it is difficult to attribute the housing needs resulting from any additional policy-on economic uplift to specific areas. Nevertheless, the JCS has sought to distribute this uplift in dwellings in accordance with the amount of employment land potential in each authority area and with the spatial strategy set out at Policy SP2. This has resulted in the policy-on OAN for each area set out at Table SP1b.

**Table SP1b OAN with economic uplift**

	Gloucester	Cheltenham	Tewkesbury	JCS
Policy-on OAN 2011-31	13,675	10,395	9,425	33,500

- 3.1.14** 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.

**3.1.15** Further to the economic uplift an additional 5% increase has been applied to the economic led OAN. This 5% has been added in order to boost the delivery of affordable housing as well as providing additional flexibility to the supply of land and boosting housing delivery in general.

This further uplift has resulted in an overall housing requirement for the JCS area of 35,175 dwellings over the plan period. The resulting requirement for each area is set out at Table SP1c.

**Table SP1c ‘Policy-On’ OAN with 5% Uplift**

	Gloucester	Cheltenham	Tewkesbury	JCS
Policy-on OAN + 5% Uplift 2011-31	14,359	10,917	9,899	35,175

**Delivery**

**3.1.16** The JCS plans for a significant level of housing and employment development to meet the needs of the area over the plan period. The level of housing development proposed is at an overall rate higher than that observed in the JCS

area overall since 1991 and would represent an increase in housing supply in line with the aims of NPPF and the best available information of the likely levels of housing required by 2031.

Annual JCS Housing Delivery		Annual JCS Housing Requirement
1991-2001	2001-2011	2011-2031
1,326	1,450	1,759

**3.1.17** Policy SP2 provides the spatial strategy for 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, whilst the JCS provides the strategic-level part of the development plan, there is a significant role for delivery at the non-strategic level through both the district and neighbourhood plans.

Where neighbourhood plans are ‘made’, they form part of the development plan and its policies will be used in decision making to determine planning applications. The JCS authorities recognise the contribution that neighbourhood plans can make in helping the delivery of growth and will work with town and parish councils and community groups to support them in producing plans.

**3.1.18** Each authority will also be covered by a district-level plan, namely the Gloucester City Plan, Cheltenham Borough Plan and Tewkesbury Borough Plan. These plans will provide more detailed and locally specific planning policies as well as local site allocations. The District plans will deliver the individual district capacities identified through the JCS in accordance with the spatial strategy. Neighbourhood plans must be in conformity with strategic policies of the development plan and can have an important role in identifying sites and policies to guide development at the local level.

**3.1.19** To assess the performance of the JCS, including delivery against the OAN, a separate monitoring framework is included in the plan, setting out the key indicators and contingencies that will be critical to the successful delivery of the plan strategy.

**3.1.20** The monitoring arrangements set out in the Delivery, Monitoring and Review section will enable the JCS authorities to identify how policies and sites are delivering against the plan objectives and strategy. The monitoring may also suggest courses of action to address any issues. Further details are provided within the Delivery, Monitoring and Review section.

# SP2 – DISTRIBUTION OF NEW DEVELOPMENT

## Background

- 3.2.1** 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 has been translated into an overarching strategy for the JCS area. Policy SP2 sets out this strategy and identifies the distribution of new development across the area. Additional policy on employment and the economy is provided by Policy SD1. The proposals plan 'JCS Key Diagram' shows the distribution.
- 3.2.2** It has long been recognised that Gloucester and Cheltenham cannot wholly meet their development requirements within their administrative areas, and as such collaborative working across boundaries through the duty to cooperate 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 cooperate, to ensure that new development plan documents properly address strategic planning and cross-boundary issues. A wider memorandum of understanding is maintained between all Gloucestershire districts covering issues which require joint working. In addition, the Gloucestershire authorities have entered into a devolution bid which sets out the commitment to work together to progress strategic plans in the event of the creation of a devolved authority.
- 3.2.3** The JCS authorities have also specifically agreed with Stroud District Council to take a strategic approach in the review of their development plans, and to develop strategies which seek to meet objectively assessed development and infrastructure requirements in the review of their respective development plan documents. The JCS authorities will also continue to work with the South Worcestershire authorities, and Wychavon District Council in particular, in relation to future development needs. Consideration will be given to meeting unmet requirements from another Local Planning Authority within and outside the housing market area, where it is reasonable to do so and consistent with achieving sustainable development.
- 3.2.4** The three JCS authorities want to concentrate new development in and around the existing urban areas of Cheltenham and Gloucester to meet their needs, to balance employment and housing needs, and provide new development close to where it is needed and where it can benefit from the existing and enhanced sustainable transport network. Most of this development will be in the form of urban extensions within Tewkesbury Borough, because of the nature of the administrative boundaries in the JCS area. Tewkesbury town plays a smaller role in accommodating new development due to its size, and the rural areas will accommodate a lower amount of new development, most of which already has planning permission.

## Policy SP2: Distribution of New Development

1. *To support their economic roles as the principal providers of jobs, services and housing, and in the interests of promoting sustainable transport, development will be focused at Gloucester and Cheltenham, including urban extensions to these areas*
2. *To meet the needs of Gloucester City the JCS will make provision for at least 14,359 new homes. At least 13,287 dwellings will be provided within the Gloucester City administrative boundary, including the Winneycroft Strategic Allocation, and urban extensions at Innsworth and Twigworth, South Churchdown and North Brockworth within Tewkesbury Borough defined in Policy SA1, and sites covered by any Memoranda of Agreement*
3. *To meet the needs of Cheltenham Borough the JCS will make provision for at least 10,996 new homes. This will be provided within the Cheltenham Borough administrative boundary and cross-boundary urban extensions at North West Cheltenham and West Cheltenham (both of which are partly within Tewkesbury Borough) defined in Policy SA1, and commitments covered by any Memoranda of Agreement*
4. *To meet the needs of Tewkesbury Borough, none of which is being met by the urban extensions to Gloucester and Cheltenham, the JCS will make provision for at least 9,899 new homes. At least 7,445 dwellings will be provided through existing commitments, development at Tewkesbury town in line with its role as a market town, smaller-scale development meeting local needs at Rural Service Centres and Service Villages, and sites covered by any Memoranda of Agreement*
5. *Rural service centres and service villages as identified in Table SP2c below will accommodate lower levels of development to be allocated through the Tewkesbury Borough Plan and Neighbourhood Plans, proportional to their size and function, and also reflecting their proximity and accessibility to Cheltenham and Gloucester and taking into account the environmental, economic and social impacts including existing levels of growth over the plan period*

*Over the plan period to 2031:*

  - i. *The rural service centres will accommodate in the order of 1860 new homes, and;*
  - ii. *The service villages will accommodate in the order of 880 new homes;*
6. *In the remainder of the rural area, Policy SD10 will apply to proposals for residential development.*
7. *The unmet needs of Gloucester and Cheltenham, beyond their administrative boundaries, will only be delivered on Strategic Allocation sites allocated through Policy SA1 and any other sites with an agreed sharing mechanism through a Memorandum of Agreement between the relevant local planning authorities*
8. *The identification of any additional urban extensions to help meet the unmet needs of a Local Planning Authority must be undertaken through a review of the plan. Any additional site allocations made through a local plan or any neighbourhood plans must be in conformity with the JCS spatial strategy. Consideration will also be given to meeting needs in another local authority area where it is clearly established that they cannot be met within the JCS area, or provide a more sustainable and appropriate option*
9. *To support economic growth in the JCS area, the JCS will make provision for at least 192 hectares of B-class employment land. At least 84 hectares of B-Class employment land will be delivered on Strategic Allocation sites as detailed at Policy SA1. Any further capacity will be identified in District plans.*

*(The amount of development and its distribution is set out in Tables SP2a and SP2b (at the end of this section of the plan), and indicated on the JCS Key Diagram).*

*This policy contributes towards achieving Objectives 1, 2, 3, 4, 5, 6, 7, 8 and 9.*

## Explanation

- 3.2.5** 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.
- 3.2.6** 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 count towards meeting needs in the early part of the plan; secondly, sites which have already been granted planning permission, including those that are being built out; thirdly, allocated sites in existing adopted development plans. In addition, we have been informed by the Strategic Assessment of Land Availability (SALA) process, although this does not consider all constraints which could prevent sites coming forward.
- 3.2.7** An assumption has been made as to how many windfall sites (sites which are not allocated in development plans but come forward through planning applications) will be granted permission across the plan period in each district, reflecting the most recent guidance included in national PPG.
- 3.2.8** There are also further sites to be identified through the District plans. Work on the Gloucester City Plan, Cheltenham Borough Plan and Tewkesbury Borough Plan are advancing alongside the JCS and will bring forward allocations to deliver each area's identified district capacity. In total, these sources of land supply are thought to be able to provide for approximately 58% of the housing to be delivered in the JCS (19,700 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. Therefore it is essential that enough land is allocated on sites of strategic scale to provide flexibility ensuring that the overall requirements for the JCS area as a whole are met and the plan is sound.
- 3.2.9** Recognising that there is insufficient land inside the existing urban boundaries of Gloucester and Cheltenham, together with commitments within Tewkesbury town, to accommodate their housing and employment needs, there was a need to find additional land to meet the JCS needs. Hence, urban extensions to Gloucester and Cheltenham have been identified, which would accommodate approximately 35% of the housing supply identified in the JCS.
- 3.2.10** As concluded by the Sustainability Appraisal, urban extensions are considered to be the most sustainable locations for new development (following existing urban areas) as they can share transport, social and service infrastructure with existing urban areas and are located close to essential services. Further information on the approach to the distribution of development is set out in the 'Spatial Options' topic paper (October 2013), available along with the other evidence base documents on the JCS website.
- 3.2.11** The locations for the urban extensions and Strategic Allocations have been derived through a selection process involving a comprehensive assessment of land surrounding the three main centres of Gloucester, Cheltenham and Tewkesbury. Critically, this process has been informed by detailed evidence base on site-specific issues including flooding, biodiversity, Green Belt, landscape and visual sensitivity, transport and infrastructure as well as being subject to assessment through the Sustainability Appraisal. The development of the site selection process is detailed through the Broad Locations Report (October 2011) and the Strategic Allocations Report (2013).
- 3.2.12** It is anticipated that development on the urban extensions and Strategic Allocations will be started within the early part of the plan period in order to ensure an ongoing 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.

- 3.2.13** 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 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.
- 3.2.14** 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.
- 3.2.15** The total number of dwellings that is being provided for within the JCS area is approximately 31,824, 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.
- 3.2.16** 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 an early review of the plan to explore further the potential for additional sites to meet Gloucester's needs in the longer term towards the end of the plan period. This would also allow the consideration of additional development options that may become available, both within and outside the JCS area. This could include the unlocking of further development opportunities within the urban area, as well as potential new urban extensions in Tewkesbury Borough and Stroud District or elsewhere in the housing market area. The JCS authorities have a Memorandum of Understanding in place with Stroud District in this regard.
- 3.2.17** At Tewkesbury town there are similar issues with allocating strategic sites that are within the JCS area when taking into account the significant constraints and availability of land around the urban area. This issue has been exacerbated by the decision by the Defence Infrastructure Organisation regarding the delayed release of the MoD Ashchurch site. As a result Tewkesbury Borough has an identified shortfall against the total JCS requirement of approximately 2,450 dwellings. Nevertheless, there are opportunities for development at the MoD Ashchurch site within the plan period if infrastructure constraints can be overcome to release available parts of the site. Similarly there is potential for development at a site at Fiddington once the highway infrastructure needs around the A46 and M5 Junction 9 are established. While these sites cannot be allocated now due to uncertainties over their deliverability and capacity, a commitment has been set out in the Delivery, Monitoring & Review section to undertaking an immediate review of Tewkesbury's housing supply so that further work on the development potential around the Tewkesbury town and Ashchurch area can be carried out. Further information is also provided in the JCS Housing Implementation Strategy. In addition, there is joint working with Wychavon District Council to look to bring forward the cross-boundary site at Mitton, adjacent to the 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, there is joint working with Wychavon District Council to assess the potential and possible release of land at Mitton.

**3.2.18** As noted above there is currently a significant shortfall identified for Tewkesbury. However, Tewkesbury has an oversupply against its annual requirement from 2011/12 to 2016/17 and has a good supply of housing land that will enable it to meet its requirements over the short to medium term. An immediate review of the JCS would allow for the remaining shortfall to be addressed by exploring additional sites both within and outside the JCS area, including the potential for additional working with Wychavon District Council. Further information is provided within the Delivery, Monitoring & Review section of this plan.

**3.2.19** The three authorities have prepared a detailed housing trajectory setting out when development is likely to take place. This work also includes an assessment of the five-year housing land supply position; details of this assessment are set out in the Housing Implementation Strategy available on the JCS website.

**3.2.20** In regard to employment land the JCS sets the framework for the delivery of a minimum of 192 hectares of B-class employment need. The sources of supply includes a mix of high quality and well-located large strategic sites, existing undeveloped available employment sites, and potential additional smaller sites in the urban and rural areas. The Strategic Allocations are expected to deliver at least 84 ha 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 growth. Monitoring of the plan would establish the growth of employment throughout the plan period, including any windfall development, and seek to rectify any shortfall through plan review. This will include through further exploration of growth opportunities at the MoD Ashchurch site and the wider M5 Junction 9 area.

**3.2.21** 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, as well as 63ha of existing undeveloped employment land (based on previous allocations and extant permissions).

With the JCS Strategic Allocations, a total of 195ha of B-class employment land is identified. Further investigation into employment allocations and capacity will be undertaken through the District plans.

### *Apportionment of Urban Extensions*

**3.2.22** 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 Winneycroft) 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.

**3.2.23** 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 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.

### *Delivery*

**3.2.24** 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. This is set out within the Delivery, Monitoring and Review section.

**3.2.25** The Housing Implementation Strategy provides the detailed trajectory information for the JCS. The trajectory is also included as part of the Delivery, Monitoring and Review section. The JCS monitoring will identify where Strategic Allocations, proposals or policies are delivering against the plan objectives and strategy.



**Table SP2a: Sources of housing supply in the JCS area**

<b>Gloucester City</b>	<b>Housing Supply</b>
Completions	2,962
Commitments*	2,460
Windfall Allowance	832
Gloucester City Plan (Further Potential)	1,518
Strategic Allocations (Gloucester City)	620
Urban Extensions (Tewkesbury Borough)	4,895
<b>Supply Total</b>	<b>13,287</b>

<b>Cheltenham Borough</b>	<b>Housing Supply</b>
Completions	1,724
Commitments*	2,178
Existing Local Plan Allocations	10
Windfall Allowance	784
Cheltenham Borough Plan (Further Potential)	1,011
Urban Extensions (Cheltenham Borough)	2,775
Urban Extensions (Tewkesbury Borough)	2,610
<b>Supply Total</b>	<b>11,092</b>

<b>Tewkesbury Borough</b>	<b>Housing Supply</b>
Completions	3,224
Commitments*	2,854
Existing Local Plan Allocations	0
Windfall Allowance	552
Tewkesbury Borough Plan (Further Potential)	315
Mitton (Wychavon District)**	500
<b>Supply Total</b>	<b>7,445</b>

*\*Includes Local Plan commitments*

*\*\*Site is within Wychavon District and is not an allocation in the JCS. Site is subject to joint working between Wychavon District Council and Tewkesbury Borough Council.*

**Table SP2b: Apportionment of Strategic Allocation sites and District Capacity**

Sub Area	Area	Authority Area	Housing Supply
Gloucester City Supply	Gloucester City Urban Capacity	GCC	7,772
	Winneycroft Urban Extension	GCC	620
	Innsworth & Twigworth Urban Extension	TBC	2,295
	South Churchdown Urban Extension	TBC	1,100
	North Brockworth Urban Extension	TBC	1,500
Cheltenham Borough Supply	Cheltenham District Capacity	CBC	5,707
	North West Cheltenham Urban Extension	CBC / TBC	4,285
	West of Cheltenham Urban Extension	CBC / TBC	1,100
Tewkesbury Borough Supply	Tewkesbury Borough District Capacity	TBC	6,945
	Mitton* *Site is within Wychavon District and is not an allocation in the JCS. Site is subject to joint working between Wychavon District Council and Tewkesbury Borough Council.	WDC	500
<b>Total JCS Area</b>			<b>31,824</b>

**Table SP2c: Settlement hierarchy**

Settlement tier	Settlements
Key Urban Areas	Cheltenham Gloucester
Market town	Tewkesbury
Rural service centres	Bishop's Cleeve Winchcombe
Service villages *	Alderton Coombe Hill Gotherington Highnam Maisemore Minsterworth Norton Shurdington Stoke Orchard Toddington (inc. New Town) Twyning Woodmancote

*\* The service village classification was informed by the 2015 Settlement Audit Refresh.*

*The JCS Settlement Audit will be reviewed to support the preparation of the Tewkesbury Borough Plan.*

*The outcomes of the review will be used to ensure that the service 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.*

# PART 4

## - Sustainable Development Policies

### SD1 – EMPLOYMENT – EXCEPT RETAIL DEVELOPMENT

#### *Background*

- 4.1.1** 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;
- “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”.*
- 4.1.2** This vision is underpinned by three specific strategic objectives to support a thriving economy through building a strong and competitive urban economy, ensuring the vitality of town centres and supporting a prosperous rural economy.
- 4.1.3** 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. Retail and other uses, including those within use class ‘A’ are not covered by this Policy and are dealt with in Policy SD2. More detailed policies will be included in District plans.
- 4.1.4** 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.

## Policy SD1: Employment – except retail development

*Employment-related development will be supported:*

- i. At Strategic Allocations, in line with Policy SA1, where it is expected that employment land should normally be used for B-Class uses, except where it can be demonstrated that non B-Class uses would support the residential and B-Class development at that Strategic Allocation. In order to support key growth sectors or other key local economic drivers, on some Strategic Allocations, priority will be given to specific sectors as set out in the SA site policies;*
- ii. At locations allocated for employment use within the Development Plan;*
- iii. For the redevelopment of land already in employment use, or when the proposal involves a change of use from non B-Class employment uses to B-Class uses where the proposal is of appropriate scale and character;*
- iv. For the development of new employment land within Gloucester City, the Principal Urban Area of Cheltenham and Tewkesbury town;*
- 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;*
- vi. In the wider countryside when it is:
  - a) located within or adjacent to a settlement or existing employment area and of an appropriate scale and character;*
  - b) employment-generating farm diversification projects, which are of an appropriate scale and use, particularly where they involve the re-use of appropriate redundant, non-residential buildings;**
- vii. Where it allows the growth or expansion of existing business especially in the key growth sectors, subject to all other policies of the plan;*
- viii. Where it would encourage and support the development of small and medium sized enterprises, subject to all other policies of the plan.*

*This policy contributes towards achieving Objectives 1, 2, 3 and 9.*

### *Explanation*

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| <p><b>4.1.5</b> 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.</p> <p><b>4.1.6</b> The vision and 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.</p> | <p><b>4.1.7</b> Policies SP1, SP2 and SD1 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 SA1 and the SA policies. In summary, the JCS Strategic Allocations include strategic employment land around Junction 9 of the M5, (Strategic Allocation A5), near Junction 10 employment land is included in the North West Cheltenham Strategic Allocation (Strategic Allocation A4) and at West Cheltenham (Strategic Allocation A7). 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 A2.</p> |
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**4.1.8** 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 District plans.

**4.1.9** 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 plans.

#### ***Key growth sectors and other important local economic drivers***

**4.1.10** The main thrust of the economic strategy for the JCS area is to support the M5 growth corridor proposed by the SEP and to support the key growth sectors and smaller local businesses that form the backbone of the local economy. The JCS area and the wider regional economy benefit from key infrastructure and employers, which collectively establish a centre for business and employment.

#### ***M5 growth corridor***

**4.1.11** 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.

**4.1.12** 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 task group, 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.

**4.1.13** 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.

**4.1.14** Policy SD2 aims to support employment development and economic prosperity by taking an economic-led, urban-focused development approach, with the primary aim of attracting investment and development to the main urban areas and the Strategic Allocations in the plan area. The strategy seeks to deliver strong, robust and resilient urban areas which create jobs and wealth. This in turn will support the ongoing regeneration programmes of Gloucester and Cheltenham urban areas.

**4.1.15** Employment uses, such as retail (covered in policy SD2), leisure facilities, education, health services and residential care (uses outside the 'B-Classes') are predicted to provide over two-thirds of the projected job growth across the area. Whilst these sectors do not usually generate a specific employment land requirement, the mix of future job opportunities generated will be as important as specifically allocating parcels of land for employment provision. Employment forecasts show that the greatest B- class employment growth will be in the office, research and development sectors (Use Class B1a / b) with a decline in manufacturing and industrial jobs (B2) and with minimal growth in warehousing (B8) sector jobs.

#### ***Key growth sectors***

**4.1.16** The key economic growth sectors identified in both the SEP and in the work done on behalf of the JCS authorities identify the key growth sectors in the area as:

- Aviation;
- Cyber technology;
- Energy;
- Engineering;
- Financial;
- Information technology;
- Leisure;
- Marketing and public relations.

- 4.1.17** 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.
- 4.1.18** To assess how the need for employment land can be met, each council has 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 sized enterprises, or where development would support urban regeneration or the rural economy. 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.
- 4.1.19** Providing start-up space that can be easily accessed by those establishing new businesses is also vital to stimulate innovation and entrepreneurship within the JCS area; developments are especially encouraged which provide a range of types and sizes of units including start-up and flexible workspaces. More information and guidance in this respect will come forward in District plans. Where specialised skills are available, clusters of enterprises can add value to the economy. This spatial strategy can support skills development by encouraging the provision and expansion of suitable education and training facilities with access in person and by electronic means.
- 4.1.20** 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.
- 4.1.21** 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.
- 4.1.22** 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.
- 4.1.23** 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 SD1.
- Cheltenham Racecourse**
- 4.1.24** Cheltenham Racecourse is a key part of the cultural and economic infrastructure of Gloucestershire, being the most significant visitor attraction in the JCS area and the wider sub-region. It is of international significance, being the principal venue in the UK for National Hunt Racing, on average bringing £50m p.a. to the Cheltenham economy. Ranking 2nd in the list of racecourses drawing the largest meeting attendances and with high television viewing figures (0.9million watched the Cheltenham Festival in 2015), it is clear that the Racecourse and its influence underpins the cultural offer, contributing significantly to the economy of Cheltenham.
- 4.1.25** The Racecourse's primary function as a racing venue brings significant economic benefits to the region in terms of financial income and job creation:
- 450,000 visitors attend the 16 racing fixtures, including the 250,000 over the four days of the most recent Festival in March 2015. It is estimated to contribute £50m p.a. to the local tourism economy, including visitor accommodation (around 10,000 bed spaces for overnight accommodation are required during the Festival);
  - The Racecourse currently employs 85 full time staff on site, with the additional employment of around 5,000 staff during the Festival;
  - Contractors and sub-contractors in terms of construction (and associated construction materials) and service providers are based locally in Gloucestershire and the racecourse also generates a significant number of indirect jobs.
- 4.1.26** Cheltenham Racecourse is important to the regional economy and local economy, it is therefore important to continue to improve business operations through future development and enhancement, reinforcing its importance as a tourism and visitor attraction in the region with the potential to generate further employment opportunities.

## *Gloucestershire Airport*

- 4.1.27** Gloucestershire Airport is the busiest general aviation airport in the UK, serving a sub-regional catchment of 1.9 million people and over 84,000 businesses. The JCS recognises the strategic importance of the airport and supports the SEP for Gloucestershire, which aims to optimise the contribution and benefit that Gloucestershire Airport and the land around it can make to local communities and the economy. The airport is however located in a sensitive part of the Green Belt and any future development would need to support the airport and aviation-related growth.
- 4.1.28** The Tewkesbury Borough Plan, in line with the Council's Economic Development objectives, will continue to examine the growth of the airport and the businesses surrounding it, to encourage flexibility and the relevant need for different land uses to support its ongoing operation. This will include ongoing review of the essential and non-essential operational areas of the site together with their definitions, changes to which will be progressed through the Borough Plan.

## *Gloucestershire University*

- 4.1.29** 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.
- 4.1.30** 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 marketplace. 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.

- 4.1.31** Meanwhile, the University has been adjusting its curriculum to more closely reflect the skills need demanded by the County and working in close liaison with the LEP. The Growth Hub supports new and growing business and is an example of this closer working and is funded through the local growth fund. Future opportunities relate to the growing sectors in cyber security and nuclear industries for which the County has existing advantages.

## *Tourism*

- 4.1.32** 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.
- 4.1.33** 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.
- 4.1.34** 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 maximising 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.
- 4.1.35** Cheltenham Borough is currently undertaking a review of its tourism strategy and is likely to focus on building upon the strengths of a collective marketing approach with the Cotswolds (including Tewkesbury) and Gloucester.

## *Regeneration*

**4.1.36** The reuse and regeneration of sites within the urban areas is a high priority for Gloucester. The full strategy for Gloucester is set out clearly in the Regeneration and Economic Development Strategy 2015 – 2020 document, adopted by the City Council in January 2016. The issue of city centre regeneration in particular will be at the heart of the City Plan, being the key development issue for the City over the next decade and more. Mixed use regeneration initiatives to be delivered in the next decade, including Kings Quarter, Blackfriars and Bakers Quay, will be as important as new greenfield site development on the periphery of the city.

**4.1.37** 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.

**4.1.38** 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 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.

## *Delivery*

**4.1.39** The JCS authorities will work collaboratively with developers, businesses and the LEP to ensure that the needs of employers and the business community are being met. It is essential that the JCS has sufficient flexibility to act as a catalyst for long-term growth, taking account of the aspirations of the LEP and local businesses, the understanding of extended delivery times for strategic employment sites and to provide commitment to the delivery of improvements at junctions 9 and 10 of the M5.



## **SD2 - RETAIL AND CITY - TOWN CENTRES**

### **Background**

- 4.2.1** Our city, town and rural service centres are at the heart of our communities, and as such it is critical that we seek to maintain and improve them to ensure their long-term role and wider function, promoting their competitiveness whilst ensuring their roles are complementary. These centres have a role in providing for a diverse range of shops, services and facilities that are important to the community, as well as providing an economic function in terms of employment generation but also as key tourist attractions in their own right.
- 4.2.2** The nature of these centres is changing. This is largely due to the structural changes in the retail market and, in particular, the impact of internet shopping. It is important that policies are put in place that will allow our centres the flexibility to diversify whilst supporting their vitality and viability, and also to promote competitiveness in order to provide individuality, choice and diversity. The NPPF places significant weight on the importance of designated town centres and encourages local planning authorities to put in place appropriate policies that will help to maintain and enhance their vitality and viability. It recognises that successful centres are about more than shopping and that they need a range of complementary uses to attract visitors and to prosper.

## Policy SD2 - Retail and City / Town Centres

### **1. Settlement Hierarchy**

*The area's city and town centres as defined below will be supported and strengthened to ensure that they continue to be the focus of communities. Initiatives which safeguard and enhance their role and function will be supported. The hierarchy of centres in the JCS area is:*

#### **Key urban areas**

*Gloucester City Centre and Cheltenham Town Centre*

#### **Market town**

*Tewkesbury Town Centre*

#### **Rural service centres serving their rural hinterland**

*Winchcombe Town Centre and Bishop's Cleeve Village Centre.*

### **2. Cheltenham and Tewkesbury Borough retail policies**

*Retail policies within the Boroughs of Cheltenham and Tewkesbury are set out in the saved policies of the existing Local Plans. These policies will be reviewed and taken forward through the immediate review of the JCS retail policy. Within the Boroughs of Cheltenham and Tewkesbury, new retail development will be encouraged in accordance with the policies in the saved local plans insofar as they are consistent with national planning policy*

### **3. Gloucester City Centre boundary, primary shopping area and shopping frontages**

*In advance of the immediate retail review, for the interim, the city centre boundary and primary shopping area boundaries, and primary frontages and secondary frontages for Gloucester City Centre are set out on the policies map. Within Gloucester City Centre and the Primary Shopping Area, the following approach applies:*

#### ***i. Gloucester City Centre boundary and primary shopping Area;***

*Within the defined City Centre boundary, proposals for leisure, entertainment and recreation, office, arts, culture, tourism, community facilities and residential development will be supported provided they would not have a significant adverse impact on the amenity of adjacent residents or businesses. Within the defined Primary Shopping Area, proposals for new A1 retail development will be supported.*

*Proposals for A1 retail development located outside of the primary shopping area, and for other main town centre uses where they are proposed in locations outside of the City Centre boundary, will be assessed in accordance with the sequential test and impact test as set out in the National Planning Policy Framework and Planning Practice Guidance (see criterion 6 below).*

#### ***ii. Primary frontages;***

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

## Policy SD2 - Retail and City / Town Centres

### iii. Secondary frontages;

*Within the secondary shopping frontage identified, the change of use of premises 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.*

### 4. Retail floor space requirements

*Over the plan period to 2031, provision will be made for at least the following new retail floorspace for the following settlements:*

#### Comparison goods

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

#### Convenience goods

Location	Convenience goods (net sales area, sq m)		
	2021	2026	2031
Cheltenham	577	1,252	1,805
Gloucester	2,120	2,967	3,664
Tewkesbury	770	910	1,025
Winchcombe	188	196	203
Bishops Cleeve	1,924	2,031	2,117

*The provision of the above retail floorspace will be accommodated in accordance with the sequential test and impact test and having regard to the key principles set out in this policy. Strategic retail allocations will be considered through the immediate retail review.*

## Policy SD2 - Retail and City / Town Centres

### 5. Key principles for development in Centres

*The following key principles will be drawn upon in the determination of relevant planning applications:*

- i. New residential, retail, leisure, culture, tourism, office development and community facilities that contribute to the vitality and viability of designated centres will be promoted and supported;*
- ii. Town centre development will be of a scale that is appropriate to its role and function as set out above and will not compromise the health of other centres or sustainable development principles;*
- iii. Proposals that help to deliver the regeneration strategies for Gloucester City Centre, Cheltenham Town Centre and Tewkesbury town Centre will be supported;*
- iv. The provision of new local centres of an appropriate scale to provide for the everyday needs of new communities within the identified Strategic Allocations will be permitted.*

*6. Proposals for retail and other main town centre uses that are not located in a designated centre, and 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 Policy Framework and national Planning Practice Guidance, or locally defined impact assessment thresholds as appropriate*

### 7. Retail review

*Following adoption of the JCS, this policy will be subject to an immediate review. The single issue review will take approximately two years to complete. It will cover strategic planning matters relating to the three JCS authorities including issues such as a revised assessment of retail needs, market share between different designated centres, city / town centre boundaries, site allocations, primary and secondary shopping frontages and locally defined impact thresholds.*

### Explanation

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| <p><b>4.2.3</b> In the JCS area, there is a range of centres providing different roles and functions. The two main urban centres are Gloucester City and Cheltenham Town, which offer the widest range of shopping opportunities and attract people from a significant distance.</p>  | <p><b>4.2.5</b> Gloucester City Centre has a smaller catchment but nevertheless provides a good range of shops and is performing well for a city of its size, offering good services and facilities, along with key heritage assets of national importance such as Gloucester Cathedral, which attracts significant numbers of visitors.</p>   |
| <p><b>4.2.4</b> Cheltenham town centre is a particularly strong retail centre which supports traditional high street stores alongside independent retailers and high-end boutiques and galleries; this forms an important element along with its heritage assets for tourism. As such, it performs within the sub-regional context and is second only to Bristol in the South West in terms of shopping choice on offer. It is important therefore that this is recognised, protected and, where possible, enhanced. Investment is ongoing, focused on bringing forward improvements to create better linkages between the High Street, Promenade and Lower High Street shopping areas.</p> | <p><b>4.2.6</b> The JCS Retail Study identified several underlying weaknesses in Gloucester that need to be addressed. This includes a lack of significant investment in new retail floorspace over the recent past as well as connections between the centre with the wider footfall generators such as Gloucester Docks / Quays, the Cathedral and the bus / rail interchange.</p> |

- 4.2.7** 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.
- 4.2.8** 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 which 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.
- 4.2.9** Within Tewkesbury Borough, 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.
- 4.2.10** The policy set out above has been prepared in the context of the NPPF and Planning Practice Guidance. It is underpinned by evidence contained in the JCS Retail Study (Phase 1, 2011) and the JCS Retail Study (2015). This identifies floorspace requirements for comparison goods (clothes, furniture etc) and convenience goods (food) for each of the main settlements identified in the hierarchy up to 2031. The Retail Study (Phase 1) also provided an analysis of the health of the different designated centres in the JCS area. 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.
- 4.2.11** For Gloucester City Centre, the policy identifies the Primary Shopping Area, primary and secondary shopping frontages and the City Centre boundary, and which uses will be supported in the different locations. It also sets out the approach for proposals for retail and other main town centre uses, located outside of these areas. For centres located in Cheltenham Borough and Tewkesbury Borough, saved policies in the Local Plans will be used.
- 4.2.12** Following the adoption of the JCS, this policy will be subject to an immediate review.

### *Delivery*

- 4.2.13** This is a strategic-level policy that aims to set out broad principles for retail and centres across the JCS area. There are several key elements that the policy does not cover, but which will be addressed through District plans and / or city, town or rural service centre strategies. These include the allocation of non-strategic sites to provide for identified need, and the identification of locally defined thresholds for impact assessments (as necessary) and the approach towards smaller non-strategic centres.
- 4.2.14** For the avoidance of doubt, references to 'town centres' and 'town centre uses' in this policy and throughout the JCS document are intended, unless otherwise stated, to apply to city centres, town centres, district centres and local centres and should be read as having the same meaning as the definition of 'town centres' and 'town centre uses' included in the NPPF.

# SD3 - SUSTAINABLE DESIGN AND CONSTRUCTION

## Background

- 4.3.1** The built environment plays a key role in all aspects of sustainability. It directly affects the quality of life of those who live in, visit and enjoy the JCS area. Development proposals must be designed and constructed in such a way as to maximise the principles of sustainability both as they relate to individual buildings and to the integration of new development with new and existing communities.
- 4.3.2** Development has a significant and direct impact on the environment, through the use of finite natural resources such as water and minerals, in addition to the generation of carbon emissions and waste. Sustainable design and construction seeks to use these resources efficiently and decrease waste both during the construction, use and decommissioning phases of development schemes. The use of sustainable design and construction techniques can affect how a community grows, and serves to foster knowledge and care for the natural environment and resources.
- 4.3.3** The NPPF identifies a number of ways in which planning authorities can support the move to a low carbon future. These include planning for development which reduces greenhouse gas emissions and actively supporting energy efficiency improvements in existing buildings.

## Policy SD3: Sustainable Design and Construction

- 1. Development proposals will demonstrate how they contribute to the aims of sustainability by increasing energy efficiency, minimising waste and avoiding the unnecessary pollution of air, harm to the water environment, and contamination of land or interference in other natural systems. In doing so, proposals (including changes to existing buildings) will be expected to achieve national standards***
- 2. 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;***
- 3. 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***
- 4. To avoid unnecessary sterilisation of identified mineral resources, prior extraction should be undertaken where it is practical, taking into account environmental acceptability and economic viability relating both to extraction of the mineral(s) and subsequent implementation of the non-minerals development of the site***
- 5. Major planning applications must be submitted with an Energy Statement that clearly indicates the methods used to calculate predicted annual energy demand and associated annual Carbon Dioxide (CO<sub>2</sub>) emissions.***

***This policy contributes towards achieving Objectives 5, 6 and 9.***

## Explanation

- 4.3.4** Whilst minimum standards for sustainable construction are delivered through the building control framework and required for all developments, applicants are encouraged to meet higher standards wherever possible, and doing so may increase the sustainability of the proposal as a whole.
- 4.3.5** Energy efficiency and the use of decentralised and renewable or low carbon energy is only one aspect of sustainable design and construction. It is also important to ensure that high standards of water efficiency are achieved along with other measures such as recycling construction materials, provision for the recycling of household waste, the use of sustainably-sourced materials, and the protection and enhancement of ecological features on a development site.
- 4.3.6** Global temperatures are projected to continue rising, bringing changes in weather patterns, rising sea levels and increased frequency and intensity of extreme weather for the UK (DEFRA 2010). Therefore, adaptation to reduce the impact of climate change will be necessary, for example through flood mitigation, heat proofing, open space provision, shading, water retention for irrigation, landscaping, and associated measures.
- 4.3.7** 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 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.
- 4.3.8** Mineral resources present within the JCS area include sand and gravel, clay and limestone. To avoid the unnecessary sterilisation of these important mineral resources, the Minerals Local Plan for Gloucestershire (prepared by the County Council as the Minerals Planning Authority - MPA) is required to define Minerals Safeguarding Areas (MSAs) and set out appropriate policies for managing development. Once designated, these will be shown on the Minerals Local Plan for Gloucestershire proposals map and incorporated into the JCS proposals map when it is next reviewed.
- Applicants for non-minerals development, which may sterilise mineral resources, will be required to carry out a mineral assessment in consultation with the MPA. In the interests of sustainable development, where it is environmentally and economically viable, practical and acceptable to do so, provision will need to be for the prior extraction of minerals, and wherever possible this should be used within the new development.
- 4.3.9** With regard to localised energy creation, the NPPF states that to help increase renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources.

## Delivery

- 4.3.10** In order to ensure development is adaptable to climate change, proposals should have regard to the following non-exhaustive list of requirements:
- Minimisation of flood risk by appropriate siting, drainage, and treatment of surface areas to ensure rain water permeability in compliance with Policy INF2;
  - Reduction in urban heat island effect through the use of Green Infrastructure elements such as living roofs and walls surfaced with plants or grass, increased tree cover including planting of street trees, and use and construction of water flows in compliance with Policy INF3;
  - The need to control overheating of buildings through passive design in compliance with Policy SD4.
- Appropriate use of these features can also help to contribute to energy efficiency and CO<sub>2</sub> emissions reduction, as well as potentially bringing amenity and biodiversity benefits.
- 4.3.11** Before considering the use of renewable energy technologies, the design of a development should first identify measures to reduce overall energy demand. This can include choice of building fabric and construction techniques, optimising solar gain, natural lighting and ventilation to reduce the need for space heating and / or cooling and lighting. Secondly, the design should include measures to use energy more efficiently such as increasing levels of insulation in walls, floors and roofs and improved air-tightness.

- 4.3.12** Major planning applications are defined for the purposes of this policy as either 10 or more dwellings (or residential development on a site larger than 0.5 hectare), or for any other type of development where the floorspace exceeds 1,000 square metres or site area is 1 hectare or more. In these cases, applicants will need to prepare and submit both a Waste Minimisation Statement and Energy Statement to the Local Planning Authority at the same time as any application.
- 4.3.13** For calculation purposes, energy demand should be converted to CO<sub>2</sub> emissions. Major planning applications must be submitted with an energy statement that clearly indicates the methods used to calculate predicted annual energy demand and associated annual CO<sub>2</sub> emissions. It should also include the calculations used to determine the renewable energy requirements based on the annual CO<sub>2</sub> emissions.
- 4.3.14** Delivery of the elements of this policy will come through effective development management practices.



# SD4 - DESIGN REQUIREMENTS

## Background

- 4.4.1** High-quality and well-thought-out design, tailored to meet the needs of people and location, is a key element in producing attractive, sustainable places in which people will want to live, work, learn, play and relax.
- 4.4.2** The NPPF states that ‘The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people’. It goes on to state that ‘Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area’.
- 4.4.3** The principle of requiring new development to provide good design is further reinforced by the NPPF where it states: ‘Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions’.

## Policy SD4: Design Requirements

***Where appropriate, proposals for development - which may be required to be accompanied by a masterplan and design brief - will need to clearly demonstrate how the following principles have been incorporated:***

***i. Context, Character and Sense of Place;***

***New development should respond positively to, and respect the character of, the site and its surroundings, enhancing local distinctiveness, and addressing the urban structure and grain of the locality in terms of street pattern, layout, mass and form. It should be of a scale, type, density and materials appropriate to the site and its setting. Design should establish a strong sense of place using streetscapes and buildings to create attractive and comfortable places to live, and having appropriate regard to the historic environment***

***ii. Legibility and Identity;***

***New development should create clear and logical layouts that create and contribute to a strong and distinctive identity and which are easy to understand and navigate. This should be achieved through a well-structured and defined public realm, with a clear relationship between uses, buildings, routes and spaces, and through the appropriate use of vistas, landmarks and focal points.***

## Policy SD4: Design Requirements

### *iii. Amenity and space;*

*New development should enhance comfort, convenience and enjoyment through assessment of the opportunities for light, privacy and external space, and the avoidance or mitigation of potential disturbances, including visual intrusion, noise, smell and pollution.*

### *iv. Public realm and landscape;*

*New development should ensure that the design of landscaped areas, open space and public realm are of high quality, provide a clear structure and constitute an integral and cohesive element within the design. The contribution of public realm designs, at all scales, to facilitate the preferential use of sustainable transport modes should be maximised.*

### *v. Safety and security;*

*New development should be designed to contribute to safe communities including reducing the risk of fire, conflicts between traffic and cyclists or pedestrians, and the likelihood and fear of crime.*

### *vi. Inclusiveness and adaptability;*

*New development should provide access for all potential users, including people with disabilities, to buildings, spaces and the transport network, to ensure the highest standards of inclusive design. Development should also be designed to be adaptable to changing economic, social and environmental requirements.*

### *vii. Movement and connectivity;*

*New development should be designed to integrate, where appropriate, with existing development, and prioritise movement by sustainable transport modes, both through the application of legible connections to the wider movement network, and assessment of the hierarchy of transport modes set out in Table SD4a below. It should:*

- Be well integrated with the movement network within and beyond the development itself*
- Provide safe and legible connections to the existing walking, cycling and public transport networks;*
- Ensure accessibility to local services for pedestrians and cyclists and those using public transport*
- Ensure links to green infrastructure;*
- Incorporate, where feasible, facilities for charging plug-in and other ultra-low emission vehicles;*
- Be fully consistent with guidance, including that relating to parking provision, set out in the Manual for Gloucestershire Streets and other relevant guidance documents in force at the time.*

*2. Detailed requirements of masterplans and design briefs, should the Local Planning Authority consider they are required to accompany proposals, are set out in Table SD4d. These requirements are not exhaustive.*

*This policy contributes towards achieving Objectives 4, 5, 6, 7, 8 and 9.*

## Explanation

- 4.4.4** The quality of our lives is determined in part by the condition of our surrounding environment. Quality of place has an important role in attracting and retaining people, and contributes to the overall quality of life. Urban, architectural and landscape design quality, and the conservation of the historic and natural environment, are key elements in creating positive and inspiring places for people. Guidance on some of these elements, together with requirements for design briefs and masterplans prepared by developers is provided in Tables SD4a-d below. Prospective developers are advised to have regard to this guidance in meeting the policy requirements set out above.
- 4.4.5** Good design, including appropriate attention to detail, typically makes the difference between a high-quality and successful development and a mediocre or unsuccessful one. Development at any scale and location should make a positive contribution to providing better places for communities. The quality of the local environment can also play a crucial role in the economic success of an area.
- 4.4.6** The JCS area encompasses a wide variety of settlement types, whose scale and character varies considerably. Each of these settlements presents a distinctive character and identity, with many containing important heritage assets, highly-valued green infrastructure and / or built environments that are of considerable quality.
- 4.4.7** Well-designed buildings and urban spaces help create a sense of place and identity and contribute to civic pride. The consideration of local distinctiveness through high-quality design is essential within the design process and can be achieved either by adding to what is locally distinctive or by creating a new sense of place, where this is appropriate.
- 4.4.8** Design plays an important role in shaping a healthy and safe environment and can contribute to healthy and active lifestyles. This is not only through the construction of high-quality buildings and public realm but also through the provision of open spaces and other green infrastructure.
- 4.4.9** Good design also has a fundamental role in providing safe and secure living environments. This encompasses reducing fear of crime, providing functional solutions to improve security, and reducing the risk of fire. Reference to the principles of the UK Police’s Secured by Design toolkit and other extant relevant guidance will help in providing safe and secure living environments.
- 4.4.10** To promote healthier lifestyles, assist in climate change mitigation, minimise the volume of car-based travel on the existing highway network, and enhance the offer of the wider transport network, new developments in or adjacent to urban areas should be designed to promote the use of alternatives to the car. Where infrastructure to enable alternatives does not exist, consideration should be given to its provision where feasible and financially viable.
- 4.4.11** Table SD4a is an assessment hierarchy and is not a hierarchy of provision. The aim, through its application, is to help deliver decisions about development design that seek as a matter of course to reduce CO<sub>2</sub> and other harmful emissions and promote healthier lifestyles through encouraging walking, cycling and public transport use where possible.

**Table SD4a**

Hierarchy of Transport Modes	
<b>Highest</b>	<ol style="list-style-type: none"> <li>1. Pedestrians and people with mobility difficulties</li> <li>2. Cyclists</li> <li>3. Public transport and social / community services</li> <li>4. Access by commercial vehicles</li> <li>5. Ultra-low emission vehicles</li> </ol>
<b>Lowest</b>	<ol style="list-style-type: none"> <li>6. Other motorised vehicles</li> </ol>

Table SD4b

## Principles of Urban Design

### **Character**

- i. Create or reinforce a sense of place with its own distinctive identity;*
- ii. Reflect existing topography, landscape and ecology;*
- iii. Utilise a hierarchy of building form and design to reflect the use and importance of buildings;*
- iv. Create focal points and places, that signal clear nodes for sustainable movement;*
- v. Create areas of hard and soft landscaping;*

### **Continuity and enclosure**

- vi. Use buildings and trees to define space;*
- vii. Distinguish clearly between public and private spaces, providing continuous building frontages between them where possible;*

### **Quality of the public realm**

- viii. Create attractive spaces which provide a variety of interest and experience;*
- ix. Produce comfortable local microclimates;*
- x. Provide overlooking of streets and spaces, especially main elevations;*
- xi. Design lighting and landscaping to reduce opportunities for crime;*
- xii. Enrich space with well-designed details (e.g. paving, public art, lighting, signs, seats, railings, cycle parking, bus shelters and other street furniture);*
- xiii. Avoid visual clutter and confusion, especially from signs and advertisements;*
- xiv. Design areas for ease of maintenance, particularly in regard to litter collection, mechanical sweeping, and the maintenance of planted areas;*

### **Ease of movement**

- xv. Promote accessibility to and within an area by foot, bicycle, and public transport and for people with limited mobility prioritising direct legible routes for these modes.*
- xvi. Integrate transport nodes to promote public transport use and provide seamless movement between modes;*
- xvii. Increase permeability by avoiding cul-de-sacs and connecting adjacent streets;*

### **Legibility**

- xviii. Develop a clear, easily understood image of an area;*
- xix. Retain and create views of existing and new landmarks, skylines and other focal points;*
- xx. Provide recognisable and memorable features, especially at key locations;*

### **Durability**

- xxi. Create spaces that can adapt easily to changes in need and use;*
- xxii. Provide environments which are suitable for their use;*
- xxiii. Use materials that are fit for purpose as well as attractive;*

### **Diversity**

- xxiv. Where appropriate within buildings, streets or areas, consider a mix of building forms, uses and tenures.*

Table SD4c

## Principles of Architectural Design

*The architectural design of new buildings and alteration of existing buildings should demonstrate a creative response to a specific site and locality. Particular attention should be paid to:*

### **Function**

- i. Fitness for purpose;*

### **Character**

- ii. Historical context;*
- iii. Distinctive features of the locality (such as spatial quality, rhythms, density, scale, style and materials);*

### **Layout**

- iv. The urban grain (the pattern and density of routes, street blocks, plots, spaces and buildings of a locality) and topography of an area;*
- v. The efficient use of land;*

### **Scale**

- vi. The size of the building, its elements and its details in relation to its surroundings and the human form;*
- vii. Massing (the arrangement, volume and shape of a building);*
- viii. Height (its effect on shading, views, skylines and street proportion);*

### **Appearance**

- ix. Materials (high quality and suited to their location and purpose);*
- x. Detailing;*

### **Landscape**

- xi. The integration of buildings and landscape.*

**Masterplans and Design Briefs to be provided to support planning applications will encompass:**

**(i) A vision which should:**

- *Exhibit a high level of ambition and design quality for the creation of tomorrow's places which could be created building on the overall vision for the district and town;*
- *Show how the vision is guided by achieving a distinctive identity and a strong sense of place that is derived from an understanding of the characteristics of the site, its history and its geography. This will be essential in ensuring the delivery of a place which demonstrates an enduring quality.*

**(ii) A masterplan which should:**

- *Demonstrate a robust design process including an in-depth assessment of the site and its context and constraints, and identifying those issues that have informed the vision for and design of the development;*
- *Show how consultation with the existing community has been incorporated;*
- *Show that the design requirements of the scheme work within the vision, and clearly demonstrate how the vision may be achieved;*
- *Define and respond to local context and create or reinforce local distinctiveness;*
- *Demonstrate a consideration of heritage assets and their setting, assessing the effects of the proposed development and measures proposed to avoid substantial harm;*
- *Show a clear development structure and design concept that facilitates and encourages the delivery of all amenities, services and behaviours needed to support sustainable lifestyles;*
- *Explain the key elements and development principles of the masterplan to create a simple, robust and structuring framework for development that fixes land use and density, movement and connectivity, and open space and landscape;*
- *Set out the extent to which it is attempting to impose uniformity across the development areas*
- *Contain strategic urban design principles that will be used to inform subsequent detailed designs, securely founded on good practice in terms of form, function and ongoing management;*
- *Adequately set out the design quality standards for architecture, public realm and landscape*
- *Contain a mechanism for delivering the vision at more detailed stages, for example design coding.*

**(iii) A design brief which should demonstrate:**

- *Good levels of integration with the surrounding area both built and natural, in particular maximising existing and potential movement connections with the existing environment to encourage walking, cycling and use of public transport;*
- *A quality of development that creates a positive sense of place and identity through the application of high-quality urban, architectural and landscape design;*
- *High level of accessibility to community facilities and local services, including facilitating access to, and where appropriate, efficient routing for high quality public transport;*
- *Community facilities, suitable infrastructure and other amenities to meet the needs of all the community, including the provision of education and training facilities, health care, community, leisure and recreation facilities;*
- *A clear structure of open spaces and landscape network to ensure that open space standards are met and that the new spaces relate well to each other and to existing areas;*
- *How sustainability matters addressed by other policies of the development plan and the NPPF and national PPG - such as those relating to biodiversity, climate change, flooding, historic environment, waste and pollution, safety, green space, and culture and tourism - have been taken into account, including the efficient use of resources both during construction and when the development is complete.*

**Delivery**

- 4.4.12** This policy will primarily be delivered through the development management process. Where appropriate, design review panels may be used.

# SD5 – GREEN BELT

## Background

- 4.5.1** Green Belt is a policy designation which keeps land permanently open to prevent urban sprawl. The Green Belt in the JCS area seeks to prevent the coalescence of Cheltenham and Gloucester, and Cheltenham and Bishop’s Cleeve. The Green Belt serves five purposes:
- To check the unrestricted sprawl of large built-up areas;
  - To prevent neighbouring towns merging into one another;
  - To assist in safeguarding the countryside from encroachment;
  - To preserve the setting and special character of historic towns;
  - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 4.5.2** Throughout the development of the JCS, we have consulted on the spatial strategy for the plan. The history of the consultations on this issue is included in the JCS Spatial Options Topic Paper 2013 which is available to view as part of the JCS evidence base. The principle of urban extensions to Cheltenham and Gloucester has consistently been deemed the most sustainable throughout the history of this work, and no other option has gained significant support during consultation. When alternative options, such as creating a new large settlement in the JCS area, or significant rural redistribution, have been tested through Sustainability Appraisal, they have performed poorly. Further information on the consultation and sustainability testing of alternative spatial strategies can be found in the JCS Spatial Options Topic Paper.
- 4.5.3** In order for Cheltenham and Gloucester to grow, both in population and economically, land must be made available for sustainable urban extensions. To fail to do so would significantly limit future opportunities for new housing and jobs. Given that development of strategic scale would normally be unsuitable because of the landscape designation status of the AONB and in areas of heightened flood risk in accordance with the NPPF, the Green Belt is the only available reasonable option for urban extensions in most cases within the JCS area. It is for these reasons the Councils considered a Green Belt review was appropriate.
- 4.5.4** The JCS authorities commissioned AMEC to carry out a Green Belt Assessment in 2011 which is available to view as part of the JCS evidence base. This work represents the most up-to-date evidence on this topic and provides an independent evaluation of the wider Green Belt within the JCS area. It is a comprehensive assessment which considers how strategic segments of the Green Belt perform against the purposes of including land within Green Belt.
- 4.5.5** 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.
- 4.5.6** 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).
- 4.5.7** 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 JCS reflects this further work.

## Policy SD5: Green Belt

- 1. To ensure the Green Belt continues to serve its key functions, it will be protected from harmful development. Within its boundaries, development will be restricted to those limited types of development which are deemed appropriate by the NPPF, unless very special circumstances can be demonstrated. That is: 'whether very special circumstances exist to outweigh the harm automatically caused to the Green Belt by virtue of the development being inappropriate and any other harm actually caused'**
- 2. The boundaries of the reviewed Green Belt are identified on the Proposed Changes to the Green Belt Boundary map. 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**
- 3. Gloucestershire Airport, Cheltenham Racecourse, existing waste management facilities in the Green Belt operating in accordance with extant planning permission, and the waste management sites allocated in the Gloucestershire Waste Core Strategy, are designated as developed sites within the Green Belt that are acknowledged as having wider benefits where the co-location of facilities can be determined as essential to their use. Notwithstanding this, further development in any of these locations will need to meet the requirements of Green Belt policy in the NPPF and / or National Planning Policy for Waste, be in accordance with the Development Plan, and not compromise the openness of the Green Belt or increase the risk of urban sprawl**
- 4. Gloucestershire Airport**
  - i. Gloucestershire Airport is shown on Inset Map 1;**
  - ii. In the Essential Operational Area of the airport, new structures, buildings or extensions to buildings will only be permitted if they are essential to the operation of the airport and require an airport location;**
  - iii. Elsewhere within the airport, in the Non-Essential Operational Area, business uses which support the airport will be permitted.**
- 5. Cheltenham Racecourse**

**At Cheltenham Racecourse, as shown on Inset Map 2, development, including extensions, will only be permitted where:**

  - i. The development is principally related to the business of the racecourse;**
  - ii. The development does not extend beyond the confines of the 'Racecourse Policy Area' (as shown on Inset Map 2).**
- 6. Waste Management Sites**

**The Gloucestershire Waste Core Strategy allocates sites for waste recovery facilities, including within the Green Belt. 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.**



## Policy SD5: Green Belt

### 7. Safeguarded areas

- i. An area of land west of Cheltenham, as shown on Inset Map 3, will be safeguarded for longer-term development needs. A large area of land at West Cheltenham is also designated as an Odour Monitoring Zone, where development which is likely to be significantly affected by odours will not be permitted;*
- ii. An area of land at North West Cheltenham, as shown on Strategic Allocation Plan A4, will be safeguarded for longer-term development needs;*
- iii. An area of land at Twigworth, as shown on Strategic Allocations Plan A1, will be safeguarded for longer-term development needs;*
- iv. Safeguarded areas are not allocated for development at the present time. Planning permission for the permanent development of safeguarded land (except for uses that would not be deemed inappropriate within the Green Belt) will only be granted if a future review of the JCS deems the release of this land necessary and appropriate and proposes the development;*
- v. Should any land be released in the safeguarded areas adjacent to Strategic Allocations A1, A4 and A7, development proposals will be assessed against the following criteria:*
  - Development must be well-integrated and planned as part of any urban extension of strategic scale, directly and substantially physically linked to the urban area of Cheltenham or Gloucester;*
  - 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 or Gloucester;*
  - Development must not lead to a piecemeal, isolated or inefficient use of land in this area.*

***This policy contributes towards achieving Objective 4***

### ***Explanation***

- 4.5.8** The NPPF allows the review of Green Belt boundaries in exceptional circumstances. Part of these requirements are that local planning authorities take account of the need to promote sustainable patterns of development by: not including land which it is unnecessary to keep permanently open, being satisfied that Green Belt boundaries will not need to be altered at the end of the development plan period, and identifying areas of 'safeguarded land' between the urban area and the Green Belt for development beyond the plan period.
- 4.5.9** The justification for amending the Green Belt boundary to meet objectively assessed housing and employment needs, and the process that was followed to reach these decisions, are set out in Policy SP2 and its supporting text. Where Green Belt boundaries have been altered, the emphasis has been on identifying a firm boundary, such as a road, building line or watercourse in accordance with the NPPF. These boundaries have been clearly defined using physical features that are readily recognisable and likely to be permanent.
- 4.5.10** The Green Belt boundary has been altered to accommodate Strategic Allocations at A1, A2, A3, A4 and A7 as set out in Policy SA1 and on the Key Diagram.
- 4.5.11** The new boundaries identified on the Green Belt map have also taken into account longer-term need by identifying safeguarded land which may be required beyond this plan period to ensure that the Green Belt does not need an early review. The safeguarded areas for future growth have been located in an area where the threat of coalescence between Gloucester and Cheltenham, and between Cheltenham and Bishop's Cleeve, is reduced, and where new development can be fully integrated into the existing urban form.

### *Developed sites within the Green Belt*

- 4.5.12** Gloucestershire Airport is a general aviation airport that handles 90,000 aircraft movements every year, many for business purposes. The JCS supports the Strategic Economic Plan for Gloucestershire which states: *“the Local Enterprise Partnership aims to optimise the contribution and benefit that Gloucester Airport and the land around it can make to local communities and the economy”*.
- 4.5.13** Gloucestershire Airport is an appropriate use within the Green Belt and is regarded as a key regional asset and as such the policy seeks to support this role. Because of the airport’s location in the Green Belt, new development will need to be principally airport-related, although this would not necessarily preclude its use for other activities where these are appropriate Green Belt uses. Within the functional airport area, only essential airport operational structures are to be located in order to retain the openness of the Green Belt. An airport-related use is one for which an airport location is essential for its operation, for example, terminal buildings, hangars, other essential storage buildings, control towers, areas for handling air freight, and parking facilities associated with the airport.
- 4.5.14** Cheltenham Racecourse is an appropriate use within the Green Belt and is the principal venue in the country for National Hunt Racing. The racecourse management continually strives to improve facilities for race-goers, through redevelopment or the construction of new buildings. Proposals of this nature will need to be assessed in relation to the national significance of the venue as well as Green Belt policy. In order to assess the impact on the surrounding area of open air activities or other forms of recreation or gathering, Cheltenham Borough Council may wish to grant temporary permissions in the first instance.
- 4.5.15** Because of the Racecourse’s location in the Green Belt, new development will need to be well related to the business of the Racecourse. 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.
- 4.5.16** The Cheltenham Racecourse policy area has been amended from that shown in the 2006 Cheltenham Plan to allow for further growth of facilities required for the business of the Racecourse.
- 4.5.17** 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).
- 4.5.18** 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.

### *Other amendments to the Green Belt boundary*

#### *West Cheltenham*

- 4.5.19** A change has been made to the Green Belt boundary to the north of the Strategic Allocation at West Cheltenham and to the south of the allocation at North West Cheltenham in the area of the Old Gloucester Road and Arle Nurseries. This is to provide a more appropriate Green Belt boundary after the removal of the Strategic Allocations from the Green Belt.

#### *South West Cheltenham*

- 4.5.20** A small change has been made to the Green Belt boundary at the south west of Cheltenham (known as the former M&G site) to provide a more appropriate boundary after an implemented permission.
- 4.5.21** 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.

## *North Gloucester*

- 4.5.23** The Green Belt boundary around North Gloucester has been redrawn to accommodate the Strategic Allocations and to provide a more appropriate boundary.

## *Safeguarded land*

- 4.5.24** The new boundaries identified on the Green Belt map have also taken into account longer-term need by identifying safeguarded land which may be required beyond this plan period to ensure that the Green Belt does not need an early review. The safeguarded areas for future growth have been located in an area where the threat of coalescence between Gloucester and Cheltenham, and between Cheltenham and Bishop's Cleeve, is reduced, and where new development can be fully integrated into the existing urban form.
- 4.5.25** Safeguarded areas are not allocated for development at the present time. Planning permission for the permanent development of safeguarded land will only be granted following a review of the JCS except for uses that would not be deemed inappropriate within the Green Belt.
- 4.5.26** A significant constraint on the safeguarded land at West Cheltenham is the operation of Hayden Sewage Treatment Works, which is a long-established site with an area of around 22 hectares. The Sewage Treatment Works has been upgraded in recent years, but still emits odours which have the potential to seriously affect any developments that occur nearby.
- 4.5.27** 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. In parallel to reducing odour emissions, Severn Trent is committed to the future development opportunities associated with this site. This includes ongoing assessment of the viability of whole sale relocation of the existing treatment works. In time, this would enable the entire area of the Safeguarded Land to be released for development. On review of the JCS 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.

- 4.5.28** 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 SD14 Health and Environmental Quality of the JCS, and relevant advice from the Environment Agency or other expert body.
- 4.5.29** 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 Frogfurlong Lane, Dowth 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 has been identified as Safeguarded Land which could provide a potential development option in future through a review of the JCS.

## *Delivery*

- 4.5.30** Delivery of this policy will be furthered by development management and enforcement procedures to ensure the ongoing protection of the Green Belt from inappropriate development.

# SD6 – LANDSCAPE

## Background

**4.6.1** The JCS area contains a wide variety of landscapes, ranging from the Cotswolds Area of Outstanding Natural Beauty (AONB) in the east to the River Severn and its floodplain in the west. The different landscapes have been characterised by landscape assessment work, which forms a baseline against which change can be measured. Landscape character is defined as the distinct and recognisable pattern of elements that occur consistently in a particular type of landscape. It is based on the combination and relationships between the physical features of the landscape such as

landform, geology, soils, ecology and vegetation, land use and human settlement. It creates a particular sense of place for different areas of the landscape.

**4.6.2** The landscape of the JCS area provides the setting for its towns and villages. Landscape character is a key component of an area's identity and development will be required to respect it. Landscape proposals for new development should be appropriate to the landscape character of the locality and contribute to local distinctiveness.

## Policy SD6: Landscape

- 1. Development will seek to protect landscape character for its own intrinsic beauty and for its benefit to economic, environmental and social well-being;**
- 2. Proposals will have regard to the local distinctiveness and historic character of the different landscapes in the JCS area, drawing, as appropriate, upon existing Landscape Character Assessments and the Landscape Character and Sensitivity Analysis. They will be required to demonstrate how the development will protect or enhance landscape character and avoid detrimental effects on types, patterns and features which make a significant contribution to the character, history and setting of a settlement or area;**
- 3. All applications for development will consider the landscape and visual sensitivity of the area in which they are to be located or which they may affect. Planning applications will be supported by a Landscape and Visual Impact Assessment where, at the discretion of the Local Planning Authority, one is required. Proposals for appropriate mitigation and enhancement measures should also accompany applications.**

***This policy contributes towards achieving Objectives 4 and 9.***

## Explanation

**4.6.3** Landscape character is a key component of the European Landscape Convention (Council of Europe), which seeks to protect, manage and create landscapes, and is based on the premise that all landscapes are important. A key component in implementing the convention is the National Character Areas map of England, which sets out landscape character on a broad scale, with the principal areas in the JCS area being the Severn and Avon Vale (NCA106) and the Cotswolds (NCA107). National Character Area Profiles have been prepared by Natural England for both these areas and identify key

features and enhancement opportunities. The importance of landscape protection – both at national and local level – is reflected in the NPPF where, together with protection of nationally designated landscape areas, government requires the planning system to protect and enhance within the local environment 'valued landscapes, geological conservation interests and soils'.

**4.6.4** The relevant Landscape Character Assessments (LCAs) for the JCS area are those for The Cotswolds AONB and for Gloucestershire as a whole. The Gloucestershire LCA divides the county into landscape character areas and identifies a number of different landscape types and the key issues for their conservation and enhancement. The findings of the LCA are a key factor to be considered in the design of developments and in assessing their impacts.

**4.6.5** In the urban fringe areas, a Landscape Characterisation and Sensitivity Analysis (LCSA) has been undertaken. This identifies in more detail the landscape character and sensitivity of potential development sites around Gloucester, Cheltenham and Tewkesbury. It should be used to assess the impact of developments in the urban fringe areas. The analysis grades sensitivity in five categories from low to high with high-medium and high categories being particularly sensitive to development.

**4.6.6** In areas outside the area covered by the LCSA, the Local Planning Authority will advise whether an assessment should be included with an application for development to demonstrate that sensitivity has been taken into account.

**4.6.7** It is important that landscape character is assessed in process terms separately from visual impact in evaluating the potential impact of development. These two elements, when considered together, enable an assessment to be made of the sensitivity to change of different landscapes.

#### *Delivery*

**4.6.8** This policy will primarily be delivered through the development management process and via implementation of other policies within the plan, such as Policy SD4.



# SD7 – THE COTSWOLDS AREA OF OUTSTANDING NATURAL BEAUTY

## Background

**4.7.1** The Cotswolds Area of Outstanding Natural Beauty (AONB) is the largest AONB in the country. Its management is co-ordinated through The Cotswolds Conservation Board. The NPPF confers on AONBs protection from major development, making clear that permission should only be granted in exceptional circumstances and where it can be demonstrated to be in the public interest.

For the purposes of Policy SD7, whether or not a proposal constitutes major development will be considered as set out at Paragraph 4.7.4 below. Detailed policies for the management of development in or affecting the AONB may be set out in relevant District plans.

## Policy SD7: The Cotswolds Area of Outstanding Natural Beauty (AONB)

***All development proposals in or within the setting of the Cotswolds AONB will be required to conserve and, where appropriate, enhance its landscape, scenic beauty, wildlife, cultural heritage and other special qualities. Proposals will be required to be consistent with the policies set out in the Cotswolds AONB Management Plan.***

***This policy contributes towards achieving Objectives 4 and 9.***

## Explanation

**4.7.2** The Cotswolds AONB is nationally designated for its landscape importance. Each local authority has a statutory duty under the Countryside and Rights of Way Act 2000 (Section 85) to 'have regard to the purpose of conserving and enhancing the natural beauty of the AONB'. In fulfilling this duty, Cheltenham and Tewkesbury Borough Councils will continue to work in conjunction with the Cotswolds Conservation Board. The Board has prepared the Cotswolds AONB Management Plan 2013-2018 to guide its management. The Management Plan is supported by more detailed guidance on a range of topics including a landscape strategy and associated guidance underpinned by the Cotswolds AONB Landscape Character Assessment. The Management Plan and guidance are material considerations in determining planning applications in or affecting the AONB.

**4.7.3** Development close to, but outside, the AONB boundary has the potential to have a detrimental impact on its setting through, for example, its impact upon key views, or its impact upon landscape character in and around

the AONB boundary. Proposals likely to affect the setting of the AONB must fully consider any potential impacts.

**4.7.4** Major development can be defined in quantitative terms – a threshold number of dwellings, for example. However, it follows from appreciation of the JCS area's varied natural form that consideration of what constitutes 'major' development is both a matter of context and a matter of fact and degree: what is deemed to be 'major' in one area may not be deemed to be so in another. The sensitivity of The Cotswolds AONB and its setting is a good example. The JCS therefore does not provide a quantitative definition of 'major development' here as this would be misleading and inflexible within the context of a policy largely concerned with qualitative issues. Where Policy SD7 is invoked, it will therefore be a matter for the determining authority to advise applicants as to whether or not their proposal constitutes major development.

**4.7.5** This policy will primarily be delivered through the development management process.

# SD8 – HISTORIC ENVIRONMENT

## *Background*

- 4.8.1** The JCS and District plans will together provide a framework of policies for securing the conservation, enhancement, improvement and enjoyment of the historic environment. These policies will be supported where appropriate by local strategies, partnership projects, and urban regeneration initiatives including local transport improvement schemes.
- 4.8.2** The historic environment provides a tangible link with our past and is worth preserving for its own sake and for future generations. It forms a central part of our cultural heritage and contributes to our sense of community identity. It also provides the character and distinctiveness that is so important to a positive sense of place.
- 4.8.3** The JCS area has a rich and diverse historic environment which is evident in the survival of individual historic assets including some 4,888 listed buildings, 35 conservation areas, 88 scheduled ancient monuments, and other sites of historic interest such as battlefields, parks, gardens, landscapes and archaeological sites. These include important historical features such as Gloucester’s Roman remains, Cathedral, canal corridor and docks; the Regency architecture and town planning of Cheltenham; and Tewkesbury’s historic core, waterways, medieval abbey, Wars of the Roses battlefield, market towns and villages with medieval origins, wider rural landscapes and agricultural heritage. The architecture of all three districts has also been influenced by the availability of Cotswold building stone.
- 4.8.4** New forms of development can enhance or erode the appearance, character and distinctiveness of our historic environment. A key challenge for the future is therefore to manage change in a way that realises the regeneration potential of the area while protecting and capitalising on its unique heritage.

## Policy SD8: Historic Environment

- 1. The built, natural and cultural heritage of Gloucester City, Cheltenham town, Tewkesbury town, smaller historic settlements and the wider countryside will continue to be valued and promoted for their important contribution to local identity, quality of life and the economy;**
- 2. Development should make a positive contribution to local character and distinctiveness, having regard to valued and distinctive elements of the historic environment;**
- 3. Designated and undesignated heritage assets and their settings will be conserved and enhanced as appropriate to their significance, and for their important contribution to local character, distinctiveness and sense of place. Consideration will also be given to the contribution made by heritage assets to supporting sustainable communities and the local economy. Development should aim to sustain and enhance the significance of heritage assets and put them to viable uses consistent with their conservation whilst improving accessibility where appropriate;**
- 4. Proposals that will secure the future conservation and maintenance of heritage assets and their settings that are at risk through neglect, decay or other threats will be encouraged. Proposals that will bring vacant or derelict heritage assets back into appropriate use will also be encouraged;**
- 5. Development proposals at Strategic Allocations must have regard to the findings and recommendations of the JCS Historic Environment Assessment (or any subsequent revision) demonstrating that the potential impacts on heritage assets and appropriate mitigation measures have been addressed.**

**This policy contributes towards achieving Objectives 1, 2, 4 and 5.**

### Explanation

- 4.8.5** The three districts in the JCS area individually enjoy and collectively share elements of an historic and cultural identity and a strong sense of place. Distinctive elements of the historic environment include, but are not limited to:
- Historic cores and their settings within the key urban areas;*
  - Historic suburbs and their settings within the key urban areas;*
  - Smaller historic settlements and their settings both within Tewkesbury Borough and on the edges of Gloucester and Cheltenham (including former villages);*
  - Areas of Victorian and Edwardian development which survive with a high degree of integrity, including terraced housing and its associated amenities;*
  - Areas of extensive suburban development which date from before the Second World War, including public housing and private developments of semi-detached and detached housing;*
  - Public open spaces, including Victorian and Edwardian municipal parks, and gardens and cemeteries;*
  - Private open spaces including those associated with ecclesiastical, educational, canal, dockside or riverside uses;*
  - The Gloucester and Sharpness Canal and its associated infrastructure of dockland ancillary buildings and structures;*
  - Buildings, structures and archaeological remains of traditional countryside skills, traditional manufacturing, traditional transportation, and associated practices;*
  - Archaeological evidence of the development of the JCS area, including its urban and rural settlements, individual archaeological sites and structures, the wider historic landscape, and those currently unidentified heritage assets that may be discovered in the future;*
  - The vernacular architecture of the Cotswolds and the Severn valley.*
- 4.8.6** New development should complement and relate to its surroundings, not only in terms of its appearance but also in the way that it functions. This will require developers to consider the relationships between buildings, relationships of buildings to their settings, and relationships with adjacent land uses and the wider landscape, all of which contribute to local character and distinctiveness.



- 4.8.7** Heritage assets are a major factor in defining local character and distinctiveness. They also contribute to the success of the local economy by generating inward investment and tourism, which in turn helps to secure the long-term future of our heritage.
- 4.8.8** Designated heritage assets include world heritage sites, scheduled monuments, listed buildings, protected wreck sites, registered parks and gardens, registered battlefields, and conservation areas designated under the relevant legislation. Undesignated heritage assets include archaeological sites, historic designated landscapes, historic buildings and other structures including local listing.
- 4.8.9** The JCS authorities and their partners, including Gloucestershire County Council and Historic England, maintain an evidence base relating to the historic environment. This is an important source of information for developers. It also informs local strategies, initiatives and partnership projects associated with the conservation and enhancement of the historic environment, regeneration and place shaping, as well as the development management process. The evidence base includes Historic Environment Records maintained by Gloucestershire County Council and Gloucester City Council; Conservation Area Character Appraisals and Management Plans for each local authority; local listing including Cheltenham's Index of Buildings of Local Interest; Heritage at Risk registers held by Historic England and supplemented by local records; Gloucestershire Historic Landscape Characterisation and other assessments of landscape character and sensitivity (refer to Policy SD6); and information held by the Gloucestershire Records Office.
- 4.8.10** The JCS Historic Environment Assessment has also been undertaken in order to provide a review of the historic environment at Strategic Allocations. The assessment is based on existing archaeological and historical records and surveys of built heritage and historic landscape character. It considers the impact of potential development on the historic environment resource within and surrounding each of the Strategic Allocation areas. It also provides advice on planning requirements and on further assessments that will need to be carried out prior to development, as well as suggesting mitigation measures. Development proposals at Strategic Allocations must have regard to the findings and recommendations of the JCS Historic Environment Assessment (or any subsequent revision).

## *Delivery*

- 4.8.11** The NPPF provides a framework for conserving and enhancing the historic environment, which sits alongside a range of legislative regimes associated with planning and heritage. Policy SD8 reinforces that framework. To ensure that the historic environment makes a positive contribution towards wider social, cultural, economic and environmental benefits, the JCS takes a holistic approach and Policy SD8 should be read in association with other policies, particularly those relating to design Policy SD4, landscape Policy SD6, and social and community infrastructure Policy INF4. District plans will provide supplementary policies as required, having regard to the variety, significance and condition of heritage assets in each local authority area.
- 4.8.12** Delivery of this policy will be through a range of mechanisms and funding streams. Local partnerships will have an important role to play, through regeneration and place-shaping initiatives, including local transport improvement schemes. Funding sources will include central funds such as the Heritage Lottery Fund, and developer contributions made through Section 106 or the Community Infrastructure Levy (CIL). The historic environment will also be conserved and enhanced through careful development management. Effective delivery will require close liaison with landscape, conservation and archaeology experts, and consultation with bodies such as Historic England and national amenity groups.
- 4.8.13** Development proposals must describe the significance of any heritage assets affected, including any contribution made by their setting. Proposals should also be supported by proportionate evidence demonstrating that the historic character and distinctiveness of the locality have been assessed and taken into account when preparing proposals. Where a development site includes, or has potential to include, heritage assets with archaeological interest, a desk-based assessment and, where necessary, a field evaluation must be submitted to the planning authority. Developers are required to record and advance understanding of any heritage assets to be lost (wholly or in part) through development and must provide this information to the relevant local authority for inclusion in the appropriate Historic Environment Record.

# SD9 – BIODIVERSITY AND GEODIVERSITY

## *Background*

- 4.9.1** The natural environment within the JCS area includes a wide range of geological and farmed landscapes, green open spaces, wildlife habitats and ecosystems such as the Severn catchment and Cotswold escarpment, which are recognised for their importance locally, nationally and internationally.
- 4.9.2** It is intended that all development should, wherever possible, make a positive contribution to biodiversity and geodiversity in the JCS area, helping to establish and reinforce networks for wildlife and protect and enhance geological assets, whilst being co-ordinated with the development of multi-purpose green infrastructure.
- 4.9.3** The purpose of the biodiversity and geodiversity policy is to ensure that individual assets and the quality of the natural environment in the future is planned, protected and enhanced at a strategic scale, recognising that networks extend across local authority boundaries. This requires the planning system to respect landscape features of importance for biodiversity and geodiversity, such as hills and floodplains, supporting a wide variety of rock exposures, grasslands, woodlands, rivers and streams. It also means ensuring that important habitats and species are protected and where possible restored.

## Policy SD9: Biodiversity and Geodiversity

- 1. The biodiversity and geological resource of the JCS area will be protected and enhanced in order to establish and reinforce ecological networks that are resilient to current and future pressures. Improved community access will be encouraged so far as is compatible with the conservation of special features and interests**
- 2. This will be achieved by:**
  - i. Ensuring that European Protected Species and National Protected Species are safeguarded in accordance with the law;**
  - ii. Conserving and enhancing biodiversity and geodiversity on internationally, nationally and locally designated sites, and other assets of demonstrable value where these make a contribution to the wider network, thus ensuring that new development both within and surrounding such sites has no unacceptable adverse impacts;**
  - iii. Encouraging new development to contribute positively to biodiversity and geodiversity whilst linking with wider networks of green infrastructure. For example, by incorporating habitat features into the design to assist in the creation and enhancement of wildlife corridors and ecological stepping stones between sites;**
  - iv. Encouraging the creation, restoration and beneficial management of priority landscapes, priority habitats and populations of priority species. For example, by securing improvements to Strategic Nature Areas (as set out on the Gloucestershire Nature Map) and Nature Improvement Areas.**
- 3. Any development that has the potential to have a likely significant effect on an international site will be subject to a Habitats Regulations Assessment**
- 4. Within nationally designated sites, development will not be permitted unless it is necessary for appropriate on-site management measures, and proposals can demonstrate that there will be no adverse impacts on the notified special interest features of the site**
- 5. Development within locally-designated sites will not be permitted where it would have an adverse impact on the registered interest features or criteria for which the site was listed, and harm cannot be avoided or satisfactorily mitigated**
- 6. Harm to the biodiversity or geodiversity of an undesignated site or asset should be avoided where possible. Where there is a risk of harm as a consequence of development, this should be mitigated by integrating enhancements into the scheme that are appropriate to the location and satisfactory to the Local Planning Authority. If harm cannot be mitigated on-site then, exceptionally, compensatory enhancements off-site may be acceptable.**

**This policy contributes towards achieving Objective 4.**

### **Explanation**

- |              |  |              |   |
|--------------|--|--------------|---|
| <b>4.9.4</b> | The conservation and enhancement of biodiversity has been an international, national and local priority since the Rio Convention in 1992. National priorities were set out in the UK Biodiversity Action Plan (UKBAP), first published in 1994, and more recently replaced by the UK post-2010 Biodiversity Framework (2012). The government has also published Biodiversity | <b>4.9.5</b> | 2020, a strategy for England's wildlife and ecosystem services (2011).<br>Gloucestershire contains a large number of protected sites which can be categorised as international, national and local sites. |
|--------------|--|--------------|---|

International sites include Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites (globally protected wetlands). Any development that has potential to have a likely significant effect on an international site (either alone or in combination with other plans or projects) will be subject to a Habitats Regulations Assessment. This includes a screening process followed by the completion of an Appropriate Assessment (if required) as set out in the European Union Habitats Directive 92 / 42 EEC. Development that would adversely affect the integrity of any SPA, SAC or Ramsar site will need to demonstrate exceptional requirements relating to the absence of alternative solutions and imperative reasons of overriding public interest.

## *Delivery*

- 4.9.6** National sites include Sites of Special Scientific Interest (SSSI). Local sites include Local Nature Reserves (LNR), Key Wildlife Sites (KWS) and Regionally Important Geological Sites (RIGS). These sites are subject to national and local policy protection.
- 4.9.7** 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 sets out spatial priorities for ecological conservation and enhancement across the county. A key part of this is the identification of a number of Strategic Nature Areas (SNAs), which are the key landscape-scale blocks of land where characteristic habitats that typify the county can be expanded and linked to support wildlife. Partnerships of local authorities, local communities, landowners and the private sector are also able to identify Nature Improvement Areas (NIA), such as the Cotswold Scarp NIA. These are the places which offer the best opportunities for habitat restoration on a significant scale with the greatest benefits for wildlife and are largely based on SNAs.
- 4.9.8** Geodiversity conservation concerns the protection, management and enhancement of geological formations. Advice is available through the Gloucestershire Geology Trust. It is likely that, during the lifetime of the JCS, a Geodiversity Action Plan will be developed for Gloucestershire that will provide more detailed advice on the conservation of geodiversity.
- 4.9.9** Delivery will be achieved within the context of international and national legal frameworks, countywide initiatives and local strategies for biodiversity and geodiversity. Nature conservation will also be an important consideration within the Cotswolds AONB. District plans could support the JCS by identifying and mapping components of the local ecological network, including internationally, nationally and locally designated sites. District plans may also, as appropriate, include the boundaries of SNAs and NIAs which have been identified as priority areas for habitat creation and restoration. Where necessary, District plans will provide additional detail and guidance for decision makers. This may include information on the approach to securing developer contributions, and recommendations for habitat enhancements associated with new development, such as nesting boxes.
- 4.9.10** The development management process will contribute to delivery by protecting sites, habitats and species in accordance with national and local policies and other relevant legal requirements. The NPPF is clear that the presumption in favour of sustainable development does not apply where development requiring Appropriate Assessment under the Birds or Habitats Directives is being considered, planned or determined.
- 4.9.11** Enhancements will be secured through the design of development and via planning conditions and obligations, including S106 agreements and CIL. To deliver these enhancements, developers and local authorities should work with appropriate partner organisations including the LNP and Gloucestershire Geology Trust.
- 4.9.12** The JCS requires developers to avoid harm to biodiversity or, where this is not possible, to incorporate mitigation measures into the design of developments. Developers should also ensure that development outside designated sites will not cause reasonably foreseeable harm to those sites, and if such an effect is likely, should mitigate against it. For situations where measures cannot be provided on-site, the local authorities may in certain circumstances consider a system of 'biodiversity offsetting'. In addressing the impacts of potential developments on geodiversity, it is intended that the councils will follow a similar approach to that proposed for biodiversity, based on avoidance, on-site mitigation and off-site compensation (for example, by improving the exposure of the geological feature).

# SD10 – RESIDENTIAL DEVELOPMENT

## Background

**4.10.1** The JCS guides new housing development to sustainable and accessible locations as set out in Policy SP2. Policy SD10 provides further detail around the appropriate locations for residential development in the JCS area. Some of these locations will be sites that are allocated for residential development through District plans and neighbourhood plans, while other ‘windfall’ sites will come forward unexpectedly.

**4.10.2** Throughout the plan period, local authorities are required to maintain a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements. If the authorities fail to do

this then it may be difficult to prevent ad hoc development occurring on greenfield land. This policy therefore sets an approach to residential development to assist in delivering the scale and distribution of development set out in Policies SP1 and SP2. The policy approach directs residential development to previously-developed (brownfield) land. However, the previously-developed sites available in the JCS area are not sufficient to maintain a five-year supply so some greenfield sites will be allocated for development through the JCS, district and neighbourhood plans.

## Policy SD10: Residential Development

- 1. Within the JCS area, new housing will be planned in order to deliver the scale and distribution of housing development set out in Policies SP1 and SP2**
- 2. Housing development will be permitted at sites allocated for housing through the development plan, including Strategic Allocations and allocations in district and neighbourhood plans**
- 3. On sites that are not allocated, housing development and conversions to dwellings will be permitted on previously-developed land in the existing built-up areas of Gloucester City, the Principal Urban Area of Cheltenham and Tewkesbury town, rural service centres and service villages except where otherwise restricted by policies within District plans**
- 4. Housing development on other sites will only be permitted where:**
  - i. It is for affordable housing on a rural exception site in accordance with Policy SD12, or;**
  - ii. It is infilling within the existing built up areas of the City of Gloucester, the Principal Urban Area of Cheltenham or Tewkesbury Borough’s towns and villages except where otherwise restricted by policies within District plans, or;**
  - iii. It is brought forward through Community Right to Build Orders, or;**
  - iv. There are other specific exceptions / circumstances defined in district or neighbourhood.**
- 5. Proposals involving the sensitive, adaptive re-use of vacant or redundant buildings will be encouraged, subject to the requirements of other policies including Policies SD1, INF4 and SD8. Proposals that will bring empty housing back into residential use will also be encouraged**
- 6. Residential development should seek to achieve the maximum density compatible with good design, the protection of heritage assets, local amenity, the character and quality of the local environment, and the safety and convenience of the local and strategic road network.**

***This policy contributes towards achieving Objectives 6, 7, 8 and 9.***

## *Explanation*

- 4.10.3** The agreed DCLG definition of a dwelling, based on that used by the census, is 'a self-contained unit of accommodation'. Self-containment is where all the rooms (including kitchen, bathroom and toilet) in a household's accommodation are behind a single door which only that household can use.
- 4.10.4** 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. In addition to this, proposals that will bring empty space back into use are encouraged.
- 4.10.5** 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.
- 4.10.6** Careful and innovative design is the key to achieving the highest appropriate density in a particular location. A proposal which would harm the character of a neighbourhood or site through excessive density, poor design or inadequate open space will not be acceptable. The aim is to secure a more sustainable pattern of development, utilising innovative design to achieve higher densities and to incorporate a mix of land uses where appropriate, whilst retaining the character and quality of the local environment. Detailed design requirements that support this policy are set out in Policy SD4. Policy SD2 also supports Policy SD10 by promoting residential development as part of the mix of uses including retail in designated centres.

## *Delivery*

- 4.10.7** Delivery will be by developers, registered providers and specialist housing providers, working in partnership with local authorities.
- 4.10.8** In order to deliver the scale and distribution of development set out in Policies SP1 and SP2, District plans will include local site allocations and housing supply policies as appropriate to the needs of the area. In Tewkesbury Borough, this will include allocations for new housing at rural service centres and service villages, proportional to their size and function, and also reflecting their proximity and accessibility to Cheltenham and Gloucester. Any revisions to settlement boundaries will also be made in the relevant District plan and indicated on the associated policies map.
- 4.10.9** Where necessary, policies in District plans will support the implementation of this policy, for example by providing detail in relation to rural exception sites, infill development, residential conversions and mixed-use development.
- 4.10.10** The JCS local authorities carry out an annual assessment of land availability, incorporating the Strategic Assessment of Land Availability (SALA), to identify sites that may be suitable for housing or other uses. This includes a record of brownfield and greenfield sites within the main settlement areas that may have potential for housing development. The assessment is therefore an important part of the evidence base for the planning of future housing delivery.
- 4.10.11** All relevant policies in the JCS, district and neighbourhood plans will be applied alongside this policy to ensure that proposals have no detrimental impacts, including any impact on the amenity, economy, and natural, historic and built environment of their surroundings, on the local or strategic road network, or on the health of current or future residents.

# SD11 – HOUSING MIX AND STANDARDS

## Background

- 4.11.1** It is important that new housing development addresses local needs and contributes to the creation of mixed and balanced communities. This means providing sufficient good-quality housing of the right sizes, types and mix, in the right places, which will be attractive to and meet the identified needs of different groups in society, including families with children, first-time buyers, older people, people with disabilities, people wishing to build their own homes and Gypsy, Traveller and Travelling Showpeople communities. Well-designed housing should also be accessible and adaptable to meet people's changing needs, helping to sustain independent living, and contributing to a low carbon future.
- 4.11.2** Balanced communities consisting of a range of housing types can help to achieve a sustainable community by:
- Supporting a wider range of social and community infrastructure such as schools, nurseries, shops and public transport
  - Encouraging stability and community cohesion and fostering an increased sense of local identity and belonging by allowing residents to move house but remain in the same area
  - Creating a more diverse and inclusive community than one dominated by a single accommodation type
  - Reducing the social isolation of particular groups in society such as older people, the young, or people with disabilities.

## Policy SD11: Housing Mix and Standards

### 1. Housing Mix

- i. Housing development will be required to provide an appropriate mix of dwelling sizes, types and tenures in order to contribute to mixed and balanced communities and a balanced housing market. Development should address the needs of the local area, including the needs of older people, as set out in the local housing evidence base including the most up to date Strategic Housing Market Assessment;*
- ii. Self-build housing and other innovative housing delivery models will be encouraged as part of an appropriate mix;*
- iii. Improvements to the quality of the existing housing stock involving remodelling or replacing residential accommodation will be encouraged where this would contribute to better meeting the needs of the local community, subject to the requirements of other policies including Policy SD4 and Policy SD8.*

### 2. Standards

- i. New housing should meet and where possible exceed appropriate minimum space standards;*
- ii. Housing should be designed to be accessible and adaptable as far as is compatible with the local context and other policies, including Policy SD8.*

### 3. Specialist accommodation

- i. Provision of specialist accommodation, including accommodation for older people, will be supported where there is evidence of a need for this type of accommodation and where the housing / bed spaces will contribute to meeting the needs of the local community;*
- ii. Specialist accommodation should be located to have good access to local services. In the case of Extra Care housing schemes which provide ancillary facilities on site, these facilities should complement those already available in the locality and should be made available to the wider community;*
- iii. Schemes that create self-contained units of accommodation will be subject to the requirements of Policy SD12.*

***This policy contributes towards achieving Objectives 5, 8 and 9.***

## Explanation

- 4.11.3** It is important to ensure that housing provision is responsive to local market changes and the needs of the local area, providing accommodation for people with different needs and at different stages in their lives. Local authorities are required by the NPPF to plan for a mix of housing and to identify the size, type, tenure and range of housing that is required. This information is contained in the local housing evidence base, which includes the JCS Assessment of Housing Requirements, the Gloucestershire SHMA 2014 and 2015 JCS update, and other data held by local authorities and their partners. Developers should refer to this evidence base to ensure that their proposals will contribute to mixed and balanced communities and a balanced housing market across the county of Gloucestershire.
- 4.11.4** In 2011, older people accounted for 13% of the population of the JCS area (NLP Assessment of Housing Needs 2012). This proportion could increase to 20% by 2031. To ensure that people can be housed in suitable accommodation whilst also stimulating the housing market by enabling older people to downsize, a proportion of new housing in the area should be suited to the needs of older people. This may include smaller and more accessible housing such as bungalows.
- 4.11.5** Throughout the plan period there will continue to be a need to provide family-sized housing in the JCS area. As the economy recovers, there is also an increasing need to provide accommodation suited to younger age groups and first-time buyers.
- 4.11.6** New housing should be designed in a way that enables households, including older people and those with disabilities, to live comfortably. This will include having adequate space to allow home working or study, space for visitors in housing for older people, and space to allow ease of movement in specialist accommodation. Within the JCS area this will be achieved by meeting or 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 SD3.
- 4.11.7** Properties should also be adaptable in order to meet people's changing needs and help to sustain independent living. In 2011, some 16.8% of the resident population in Gloucestershire had a long-term health problem or disability (SHMA 2014). Developers should therefore ensure that new housing is built to a high standard of accessibility and adaptability and that a proportion of housing are built in accordance with recognised standards. District plans may include further guidance and / or requirements on this issue.
- 4.11.8** Specialist accommodation will play a part in meeting identified needs including the needs of older people and people with disabilities. Specialist accommodation includes wheelchair-accessible housing, dementia-care housing, nursing homes, retirement villages, continuing-care retirement schemes and Extra Care housing.
- 4.11.9** 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 SD13 specifically deals with the needs of these communities setting out a criteria-based policy for the consideration of future site allocations and planning applications. The supporting text further sets out the needs for the community arising from the Gypsy and Traveller Accommodation Assessment (GTAA, 2017) at Table C4. For those members of the community who do not meet the definition the provision of culturally appropriate accommodation will be considered as part of the general housing mix. These needs will be explored further through future work on the District plans.

## Delivery

- 4.11.10** Delivery will be by developers, registered providers, and specialist housing providers working in partnership with local authorities. Where necessary, more detailed and locally-specific policies will be provided in District plans to support the implementation of specific elements of this policy, such as housing for older people, self-build housing or specialist accommodation. Requirements for the location and standards of student accommodation and houses in multiple occupation will also be set out in District plans where appropriate. Through the JCS examination a need not included within the OAHN was identified for 1,500 bed spaces for university accommodation across the JCS area within the plan period. Many of these bed spaces will have already been consented between 2011 and the adoption of the JCS. Provision for the remaining need for C1 class bed spaces will be made through the emerging District plans.



- 4.11.11** The updated 2015 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.
- 4.11.12** 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 evidenced local need and where viability is not compromised. The District plans may in future include such a policy or potentially adopt locally-specific space standards.
- 4.11.13** 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. For development at Strategic Allocations, the standards and proportions to be delivered should be agreed with the local authority. Following the findings of the Government's Housing Standards Review, District plans may in future also adopt specific standards for accessibility and adaptability.
- 4.11.14** Developers of specialist or supported accommodation should draw on the local housing evidence base and engage with the relevant local authority to ensure that their proposals meet identifiable needs within the local community and that there is a local demand for the type of accommodation they are proposing. The design of specialist accommodation should draw on best practice including guidelines for wheelchair-accessible housing (or any equivalent national standard). Proposals should demonstrate how these have been incorporated into the design of the scheme and, where appropriate, how this supports longer-term commissioning of services. Developers should also provide evidence of how proposals dovetail with current Health and Social Care Commissioning and future plans.



# SD12 – AFFORDABLE HOUSING

## Background

### 4.12.1

Local authorities are required to identify whether there is a need for affordable housing in their area and then plan to meet this need. The NPPF defines affordable housing as: social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices.

### 4.12.2

There are three main classifications of affordable housing as set out in Annex 2 of the NPPF:

- Social rented housing is owned by local authorities and private registered providers (as defined in Section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime;
- Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable);
- Intermediate housing is housing for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the affordable housing definition above. These can include shared equity (shared ownership and equity loans), other low-cost housing for sale and intermediate rent, but not affordable rented housing.

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.

### 4.12.3

The Government, through the Housing & Planning Act 2016, has also set out a duty for Local Authorities to promote the supply of Starter Homes. The Starter Homes initiative is aimed at increasing opportunities for home ownership and therefore this particular tenure of housing is to be offered for at least 20% below their market value for people who have not previously been a home buyer and want to own and occupy their own home. The Housing and Planning Act 2016 includes Starter Homes within the definition of affordable housing, however, the mechanism for introducing 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.

## Policy SD12: Affordable Housing

1. ***The JCS authorities will seek, through negotiation, for new development to deliver new affordable housing on a sliding scale approach as set out below:***
  - i. ***Within the Strategic Allocation sites a minimum of 35% affordable housing will be sought;***
  - ii. ***Outside of the Strategic Allocation sites, on sites of 11 dwellings or more, or sites with a maximum combined gross floor space of greater than 1000 sqm; a minimum of 20% affordable housing will be sought on developments within the Gloucester City administrative area and a minimum of 40% will be sought within the Cheltenham Borough and Tewkesbury Borough administrative areas;***
  - iii. ***On sites of 10 dwellings or less, which have a maximum combined floorspace of no more than 1,000 sq m, no contribution towards affordable housing will be sought;***
  - iv. ***Notwithstanding the above, affordable housing policy for sites of 10 dwellings or less may be applied under policies set out within District plans.***
2. ***This policy applies to dwellings (as defined by use class C3) and also any self-contained units of accommodation within a residential institution (use class C2). Where a development site has been divided into parts, or is being delivered in phases, the site will be considered as a whole for the purpose of determining the appropriate affordable housing requirement***
3. ***Where possible, affordable housing should be provided on-site and should be seamlessly integrated and distributed throughout the development scheme. On sites where it is not possible to deliver all affordable housing as on-site provision, the residual requirement should be provided through acceptable alternative mechanisms (such as off-site provision or financial contributions). Further guidance on acceptable mechanisms may be provided in District plans***
4. ***Affordable housing must also have regard to meeting the requirements of Policy SD11 concerning type, mix, size and tenure of residential development***
5. ***The design of affordable housing should meet required standards and be equal to that of market housing in terms of appearance, build quality and materials***
6. ***Provision should be made, where possible, to ensure that housing will remain at an affordable price for future eligible households, or that subsidy will be recycled for alternative affordable housing provision***

### ***Rural exception sites***

7. ***In certain circumstances, where there is clear evidence of a local housing need that cannot be met elsewhere, affordable housing will be permitted on rural exception sites. A rural exception site must be within, or on the edge of, a rural settlement. It should be of a scale well related to the settlement both functionally and in terms of design***

### ***Viability***

8. ***Where there is an issue relating to the viability of development that impacts on delivery of the full affordable housing requirement, developers should consider:***
  - i. ***Varying the housing mix and design of the scheme in order to reduce costs whilst having regard to the requirements of other policies in the plan, particularly Policy SD4, and the objective of creating a balanced housing market;***
  - ii. ***Securing public subsidy or other commuted sums to assist delivery of affordable housing;***

**9. If a development cannot deliver the full affordable housing requirement, a viability assessment, conforming to an agreed methodology, in accordance with Policy INF7 will be required. Viability assessments will be published in full prior to determination for all non-policy compliant schemes except in exceptional circumstances when it can be proven that publication of certain specific information would harm the commercial confidentiality of the developer to no public benefit. Where necessary the JCS authorities will arrange for them to be independently appraised at the expense of the applicant**

**The councils consider that information submitted as a part of, and in support of a viability assessment should be treated transparently and be available for wider scrutiny. In submitting information, applicants should do so in the knowledge that this will be made publicly available alongside other application documents**

**The councils will allow for exceptions to this in very limited circumstances and only in the event that there is a convincing case that disclosure of an element of a viability assessment would cause harm to the public interest to an extent that is not outweighed by the benefits of disclosure. Given the significant benefits associated with the availability of information to the public as a part of the decision making process, and the other factors identified above, the councils anticipate that there would be very few exceptions**

**If an applicant wishes to make a case for an exceptional circumstance in relation to an element of their assessment, they should provide a full justification as to the extent to which disclosure of a specific piece of information would cause an 'adverse effect' and harm to the public interest that is not outweighed by the benefits of disclosure. The council will consider this carefully, with reference to the 'adverse effect' and overriding 'public interest' tests in the EIR, as well as the specific circumstances of the case**

**10. The viability of a site may enable additional levels of affordable housing to be delivered above the requirements set out in this policy. The JCS authorities will negotiate with developers to find an appropriate balance to deliver affordable housing and infrastructure needs.**

**This policy contributes towards achieving Objectives 8 and 9.**

### **Explanation**

**4.12.4** The need for affordable housing extends to specialist accommodation including housing for older people. Where these types of accommodation create self-contained units, they are expected to contribute to the provision of appropriate affordable housing to help meet the wider housing need of the district. Self-containment is where all the rooms (including kitchen, bathroom and toilet) in a household's accommodation are behind a single door which only that household can use. There is sometimes confusion as to whether these units fall into use class defined as a residential institution (C2) or a dwelling house (C3). Our approach is that development which

creates living spaces that retain the essential characteristics of a self-contained dwelling, even if some care is provided, will be subject to the affordable housing policy. Need for C3 'special' or 'extra care' accommodation has been addressed through the JCS OAHN. Through the examination, need for 1,558 C2 'residential institution' bed spaces were identified for the plan period across the JCS area. Many of these bed spaces will have already been consented between 2011 and the adoption of the JCS. Provision for the remaining need for C2 'residential institution' bed spaces will be made through the emerging District plans.

- 4.12.5** The Gloucestershire SHMA 2014, updated in September 2015, provides evidence relating to affordable housing needs in the JCS area. It includes a Long-Term Balancing Housing Markets (LTBHM) model which informs this policy by providing an indication of the levels of affordable housing required from 2013-2031 to achieve a balanced housing market. Policy SD12 has also been informed by:
- Planning commitments at the base date of the LTBHM model (2013);
  - The composition (by site size) of expected housing delivery over the plan period, based on Policy SP2. This includes assumptions about district capacity and windfall development that are informed by assessments of land availability and past trends in housing delivery;
  - An assessment of the viability of the JCS affordable housing policy and of the JCS as a whole, taking account of the cumulative requirements of all policies and the potential for Section 106 and Community Infrastructure Levy contributions.
- 4.12.6** The policy reflects a strategic partnership approach to affordable housing delivery across the JCS area. This consistency of approach will help to ensure that full housing needs can be met in a way that supports urban regeneration and does not place onerous requirements on any individual local authority. The latest evidence from the 2015 SHMA, which emerged through the JCS examination, determined that there is a need for 638 affordable houses per year across the JCS area.
- 4.12.7** 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 to 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 to meet the overall need for affordable housing across the wider area.
- 4.12.8** Policy SD12 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.
- 4.12.9** 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 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 detailed viability evidence to determine the appropriate balance.
- 4.12.10** 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. If the 5 unit threshold is applied, payment of affordable housing and tariff style contributions on developments of 6 – 10 units should be sought as a cash payment 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.
- 4.12.11** In accordance with Policy SD11, 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.

**4.12.12** 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 needs of these communities who are identified either within or outside the Government's definition set out through the Planning Policy for Traveller Sites.

**4.12.13** To allow for delivery of rural affordable housing, it may be necessary to make an exception to the general locational requirements of Policy SP2 in accordance with Policy SD10. A strategic approach to rural exception sites is therefore provided as part of Policy SD12. When considering proposals for housing on rural exception sites, local authorities will consider whether allowing a limited proportion of market housing would facilitate the provision of new affordable housing. Further policy and guidance will be provided in District plans where required.

### *Delivery*

**4.12.14** Affordable housing will be secured through planning conditions and obligations, including Section 106 agreements. Planning conditions and obligations will also be used to ensure that affordable housing remains at an affordable price for future eligible households.

**4.12.15** Delivery will be by developers, registered providers and specialist housing providers working in partnership with local authorities and, in certain circumstances, the Homes and Communities Agency. Early pre-application discussions will be expected in all affordable housing negotiations. Where necessary, District plans will support this policy by providing further policies and guidance on implementation.

**4.12.16** The JCS approach to affordable housing delivery is to balance provision across the JCS area. It is, however, recognised that affordable housing need varies across the area with higher levels of need in Gloucester City than other districts. To ensure that provision meets localised needs, the JCS authorities will therefore need to employ a partnership approach to affordable housing nominations. Within the Strategic Allocations, this affordable housing partnership will have a critical role in determining the proportion of new affordable housing to be allocated to each local authority district.

# SD13 – GYPSIES, TRAVELLERS & TRAVELLING SHOWPEOPLE

## *Background*

- 4.13.1** ‘Planning Policy for Traveller Sites’ (PPTS) was first published by the Government in March 2012 and aligned planning policy for traveller communities more closely with other forms of housing. It introduced, for example, the requirement for councils to demonstrate a five-year supply of pitches / plots against locally-assessed targets based on robust local evidence. A replacement to the original 2012 PPTS was first published on the 31 August 2015 by the Department of Communities and Local Government, which provides a new definition of Gypsies, Travellers and Travelling Showpeople for planning purposes. Under the new guidance only those people of nomadic habit of life, including those that have ceased to travel temporarily on grounds only of their own / their family or dependants educational or health needs or old age, are defined as Travellers in planning terms. 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 completed in March 2017, replacing the Gloucestershire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTTSAA) 2013. This update provides a robust and credible evidence base to inform plan making.
- 4.13.2** 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. Tewkesbury Borough is home to the majority of communities within the JCS area. Policy SD13 sets out criteria to guide site allocations in District plans and to help determine planning applications for Gypsy, Traveller and Travelling Showpeople communities. The supporting text further details the number of pitches and plots, identified through the GTAA (2017), that are required between 2016 and 2031. Policy SD11 further provides a hook to ensure the needs of those members of the community who do not meet the planning definition are addressed through District plans. Site allocations to provide for this need will be considered through the District plans.



## Policy SD13: Gypsies, Travellers and Travelling Showpeople

- 1. Existing permanent residential and transit Gypsy, Traveller and Travelling Showpeople sites will be protected from development to alternative uses**
- 2. Proposals for new permanent and temporary, residential and transit Gypsy, Traveller and Travelling Showpeople sites will be assessed against the following criteria:**
  - i. Proposals on sites in areas of sensitive landscape will be considered in accordance with Policy SD6 (Landscape Policy) and Policy SD7 (The Cotswolds Area of Outstanding Natural Beauty). In all other locations the proposal must not have an unacceptable impact on the character and appearance of the landscape and the amenity of neighbouring properties, and should be sensitively designed to mitigate any impact on its surroundings;**
  - ii. The site has safe and satisfactory vehicular and pedestrian access to the surrounding principal highway network;**
  - iii. No significant barriers to development exist in terms of flooding, poor drainage, poor ground stability or proximity to other hazardous land or installation where other forms of housing would not be suitable;**
  - iv. The site is situated in a suitable location in terms of access to local amenities, services and facilities, including schools, shops, health services, libraries and other community facilities;**
  - v. The site can be properly serviced and is supplied with essential services, such as water, power, sewerage and drainage, and waste disposal. The site should also be large enough to enable vehicle movements, parking and servicing to take place, having regard to the number of pitches / plots on site, as well as enabling access for service and emergency vehicles, including circulation space along with residential amenity and play areas.**

***This policy contributes towards achieving Objectives 5, 8 and 9.***

### ***Explanation***

**4.13.3** The Gloucestershire GTAA 2017 sets out the need for new pitches / plots resulting from existing traveller communities in Gloucestershire between a new base date of 2016 and the plan end date of 2031. The assessment shows that within the JCS area, there is a need for at least 83 pitches for Gypsies and Travellers, and 40 plots for Travelling Showpeople, regardless of their status under the planning definition.

The breakdown of needs for the different communities, and by those who meet the definition, those who do not and those where their status is unknown, is set out in Table C4.



Table C4		2016 - 2021				2021 - 2026				2026 - 31				
Gypsies and Travellers														
	TBC	GCC	CBC	Sub-Total	TBC	GCC	CBC	Sub-Total	TBC	GCC	CBC	Sub-Total	Total	
A. Travelling households	4	0	0	4	0	0	0	0	1	0	0	1	5	
B. Non-travelling households	14	1	0	15	5	0	0	5	6	1	0	7	27	
C. Not Known	25	0	2	27	11	0	0	11	12	0	1	13	51	
<b>Sub-Total</b>	<b>43</b>	<b>1</b>	<b>2</b>	<b>46</b>	<b>16</b>	<b>0</b>	<b>0</b>	<b>16</b>	<b>19</b>	<b>1</b>	<b>1</b>	<b>21</b>	<b>83</b>	
Travelling Showpeople														
A. Travelling households	18	6	0	24	2	1	0	3	2	1	0	3	30	
B. Non-travelling households	0	0	0	0	0	0	0	0	0	0	0	0	0	
C. Not Known	0	2	0	2	1	3	0	4	1	3	0	4	10	
<b>Sub-Total</b>	<b>18</b>	<b>8</b>	<b>0</b>	<b>26</b>	<b>3</b>	<b>4</b>	<b>0</b>	<b>7</b>	<b>3</b>	<b>4</b>	<b>0</b>	<b>7</b>	<b>40</b>	

**4.13.4** The Housing Act 1985 requires Local Authorities to assess and plan for the needs of all communities residing in their areas. With this in mind, the JCS provides hooks for the District plans to consider site allocations for all members of the traveller community through a combination of Policies SD13 'Gypsies, Travellers and Travelling Showpeople' and SD11 'Housing Mix and Standards'. Furthermore, the affordable requirement for 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 SD12 'Affordable Housing'.

**4.13.5** The GTTSAA 2013 stated that if transit pitches are considered necessary, a transit site of at least 10 pitches should be provided within Gloucestershire. Alternatively, the report recommended the use of a formal 'temporary toleration' policy, to meet the needs of Gypsies and Travellers moving through the County, without the need to establish a formal transit site, which can often be difficult to manage and maintain. Since the GTTSAA was published in 2013, two transit sites have been granted planning permission in Gloucestershire, one at Morton Valence in Stroud District for six pitches and one at Minsterworth for eight pitches; 14 transit pitches in total. The suggested need arising from the GTTSAA has therefore been exceeded. However, the 2017 GTTAA presents alternative options to further meet any future need in any event.

**4.13.6** The nature of existing provision in Gloucestershire means that a very significant proportion of the needs arise in Tewkesbury Borough. However, PPTS sets out that where there are special or strict planning constraints across an area, local planning authorities should consider working together through the 'duty to cooperate' 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.

### *Delivery*

**4.13.7** The purpose of Policy SD13 is to provide a criteria-based policy to be used in the assessment of potential site allocations and planning applications. Supporting text sets out the accommodation needs of the community and that site allocations to provide for these needs will be considered through District plans.

# SD14 – HEALTH AND ENVIRONMENTAL QUALITY

## Background

**4.14.1** The JCS contains a framework of policies to support the health and well-being of local communities through provision of appropriate housing, employment opportunities, access to services, walking and cycling routes, green infrastructure, wildlife habitats, and a high-quality built and historic environment that is clean, safe and accessible. Policies are also in place to address the possible impacts of development including transport impacts, climate change and flooding.

**4.14.2** Within the JCS area, a need for new housing and employment development coincides both with areas of existing high environmental quality and areas that are in need of physical regeneration. Policy SD14 aims to ensure that development does not have any unacceptable impacts on human health or environmental quality, and that where possible it secures benefits.

## Policy SD14: Health and Environmental Quality

- 1. High-quality development should protect and seek to improve environmental quality. Development should not create or exacerbate conditions that could impact on human health or cause health inequality.**
- 2. New development must:**
  - i. Cause no unacceptable harm to local amenity including the amenity of neighbouring occupants;**
  - ii. Result in no unacceptable levels of air, noise, water, light or soil pollution or odour, either alone or cumulatively, with respect to relevant national and EU limit values;**
  - iii. Result in no exposure to unacceptable risk from existing or potential sources of pollution. For example, by avoiding placing sensitive uses in locations where national or EU limit values are exceeded, or by incorporating acceptable mitigation measures into development;**
  - iv. Incorporate, as appropriate, the investigation and remediation of any land contamination within the site;**
  - v. Ensure that any risks associated with land instability are satisfactorily resolved;**
  - vi. Take into account the quality and versatility of any agricultural land affected by proposals, recognising that the best agricultural land is a finite resource;**
  - vii. Have regard to any areas of tranquillity that are identified in adopted or emerging District plans and neighbourhood plans;**
  - viii. Avoid any adverse impact from artificial light on intrinsically dark landscapes.**
- 3. Proposals for development at Strategic Allocations, and other development proposals as appropriate, must be accompanied by a health impact assessment.**

***This policy contributes towards achieving Objectives 4, 6 and 9.***

## Explanation

- 4.14.3** Levels of health deprivation vary across the JCS area (information can be found in the Government's Index of Multiple Deprivation). Overall levels of deprivation in Cheltenham and Tewkesbury Borough are lower than the English average, while deprivation in Gloucester City is higher than average. However, there are smaller pockets of deprivation across the three districts, revealing health inequality between communities. Sizeable areas of central, north-west and south-east Gloucester are in the most deprived 20% nationally for health, as are smaller pockets in east, west and central Cheltenham and in the south of Tewkesbury town. In all three districts, there is a significant difference between the life expectancy in the least and most deprived areas.
- 4.14.4** There is an increasing body of evidence about the links between planning, health and well-being (for example, the Marmot Review 2010). Factors that are considered to impact on our physical and mental health include street layout and connectivity, safety and security, opportunities for social interaction and our ability to cope with extreme weather events. These factors are covered by a range of JCS policies including Policy SD4 and infrastructure policies. There is also a link between poor local environmental quality, poor health and socio-economic deprivation. Policy SD14 therefore recognises that the quality of the environment around us is an important determinant of human health. Environmental quality includes the quality of soil, air and water and local levels of noise and light.
- 4.14.5** Policy SD14 is also supported by Policy SD10, which encourages proposals that bring empty housing back into residential use and Policy SD11, which encourages improvements to the quality of the existing housing stock.

## Delivery

- 4.14.6** The protection and improvement of environmental quality will be achieved through local regeneration initiatives, transport plans and careful development management. Planning conditions and obligations will be used to address risks to environmental quality, secure mitigation measures, and help fund ongoing monitoring and management. Developers will need to demonstrate how their proposals meet the criteria of Policy SD14 through submission of relevant plans and technical reports having regard to national PPG. Specific assessments, such as an assessment of the impact of development on air, noise or light, may be required at the discretion of the Local Planning Authority.
- 4.14.7** District plans will provide detailed policies, as required, for the protection and promotion of human and environmental health, for example specific standards or criteria relating to noise pollution and air quality management. Local authorities will also give consideration to whether there are any areas of tranquillity that ought to be identified and protected through District plans.
- 4.14.8** Environmental protection and public health professionals and enforcement officers will have an important role in ensuring that new development complies with regulatory regimes and supports the delivery of national and local objectives. For example, new development in Air Quality Management Areas should be consistent with local air quality action plans.
- 4.14.9** Applications which may require health impact assessments should first be screened to determine whether it is necessary for a full assessment to take place.

# PART 5

## - Infrastructure Policies

### Introduction

- 5.1.1** Successful and sustainable communities depend upon physical, green and social and community infrastructure to meet the needs of residents and businesses. Infrastructure encompasses a very wide range of provision including transport, public utilities and waste management, flood management measures, social and community infrastructure such as affordable housing, health care facilities and sports provision, green infrastructure, culture, faith and spiritual facilities, education, leisure and tourism, and other community facilities ranging from community meeting halls to children's play areas.
- 5.1.2** It is important to appreciate that whilst there is a considerable degree of funding from governmental and other public sources, a significant amount of the money for provision of new or enhancement of existing infrastructure comes in the form of financial contributions from developers or in the form of payment in kind through direct provision of facilities or services. Clearly, there is only so much that a developer can be expected to contribute to infrastructure provision without threatening the economic viability of the proposal. This may be particularly so in respect of the redevelopment of brownfield land. In encouraging, where feasible, the redevelopment of brownfield land, the local planning authorities will on a case-by-case basis take into account evidence of any mitigating circumstances that affect the viability of redevelopment. Equally, a planning authority cannot reasonably be expected to allow development that will have an unacceptable impact on existing infrastructure.
- 5.1.3** Where viability appears finely balanced, hard choices may sometimes need to be made in prioritising what is to be provided and / or when it is to come forward during the life of the development. For this reason, it is crucial to consider infrastructure provision 'in the round' and not to look at items in isolation from each other. This approach is endorsed by Government at Page 3 of the National Infrastructure Plan 2013: *'The government recognises that meeting the UK's infrastructure ambitions requires a long-term sustainable plan, which means taking a cross-cutting and strategic approach to infrastructure planning, funding, financing and delivery'*.
- 5.1.4** Recognition of the need to provide sufficient infrastructure to enable and support sustainable development and economic growth is inherent within the NPPF. Whilst infrastructure is referenced frequently throughout the NPPF, several core planning principles and key sections relate specifically to it (such as Parts 4, 5, 8 and 10).
- 5.1.5** In acknowledging the central importance of infrastructure to the delivery of the plan's policies and proposals, the JCS is supported by an Infrastructure Delivery Plan (IDP). Its function is to assess the infrastructure and services that will be required to support the levels of housing and employment growth proposed in the plan. In doing so, the IDP fulfils several roles:
- It provides evidence supporting the preparation and delivery of the JCS;
  - It presents estimated infrastructure costs and secured sources of infrastructure funding, including the potential for developer contributions towards infrastructure through S106 planning obligations. In due course, it will also be the evidence base underpinning any Community Infrastructure Levy (CIL) charging schedule for each of the three constituent local planning authorities;
  - It identifies whether any Nationally Significant Infrastructure Projects (NSIPs) are expected to come forward within the JCS area. Currently there are no NSIPs in the JCS area registered with the Planning Inspectorate.
- 5.1.6** In addition to enabling development to come forward, securing delivery of infrastructure will contribute to the achievement of JCS objectives. These include limiting flood risk, reducing dependency on the car, and enhancing access to community services within local centres.

# INF1 – TRANSPORT NETWORK

## Background

- 5.2.1** Providing choice in modes of travel can help achieve sustainable development while contributing to wider economic, environmental and community objectives. Having access to different ways of travelling also contributes towards the quality of environment and the sense of place created by development, and influences the desirability of an area as a place to live or to locate a business.
- 5.2.2** The NPPF states that ‘The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel’. The ONS data on commuting patterns collected from the Annual Population Survey (2010 and 2011) indicates a high proportion of people both living and working within the JCS area. This self-containment highlights the potential for short-distance trips to transfer where appropriate to non-car modes, such as public transport, walking or cycling – something which the NPPF considers to be a core planning principle. Enabling the transfer to non-car modes requires a co-ordinated approach across several policy and delivery areas, and the JCS seeks to achieve this through its policies on design and infrastructure. This policy contributes to the delivery of the strategy’s ambitions and strategic objectives.
- 5.2.3** The preparation and implementation of transport strategy is primarily a matter for the Local Transport Plan. The role of the development plan is to reflect, support and enable the implementation of transport objectives through its land-use policies and proposals.
- 5.2.4** 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 along with the JCS transport implementation strategy (TIS), need to be read together. The LTP is the key strategy for the delivery of essential transport infrastructure to support the delivery of growth identified through the JCS. The preparation of this and other relevant parts of the JCS are the result of co-operation between the planning authorities and the Local Highway Authority. The Transport Implementation Strategy sits alongside the JCS and provides important explanation and guidance on the interpretation of policies relevant to the provision of transport in the JCS.
- 5.2.5** Highways England is a government company that is charged with operating, maintaining and improving the strategic road network in the area including the M5, M50, A40, A46 and A417. Highways England also contributes to local transport policy formulation and implementation by engaging with the Local Highway Authority through the periodic LTP review process and other relevant consultations. Ongoing partnership working also happens through regular liaison and operation meetings.



# Policy INF1: Transport Network

- 1. Developers should provide safe and accessible connections to the transport network to enable travel choice for residents and commuters. All proposals should ensure that:**
  - i. Safe and efficient access to the highway network is provided for all transport modes;**
  - ii. Connections are provided, where appropriate, to existing walking, cycling and passenger transport networks and should be designed to encourage maximum potential use;**
  - iii. All opportunities are identified and taken, where appropriate, to extend and / or modify existing walking, cycling and public transport networks and links, to ensure that credible travel choices are provided by sustainable modes.**
- 2. Planning permission will be granted only where the impact of development is not considered to be severe. Where severe impacts that are attributable to the development are considered likely, including as a consequence of cumulative impacts, they must be mitigated to the satisfaction of the Local Planning Authority in consultation with the Highway Authorities and in line with the Local Transport Plan**
- 3. Developers will be required to assess the impact of proposals on the transport network through a Transport Assessment. The assessment will demonstrate the impact, including cumulative impacts, of the prospective development on:**
  - i. Congestion on the transport network;**
  - ii. Travel safety within the zone of influence of the development;**
  - iii. Noise and / or atmospheric pollution within the zone of influence of the development;**
- 4. Where appropriate the Local Planning Authority may require applications to be accompanied by a Travel Plan that has full regard to the criteria set out in the NPPF.**

**This policy contributes towards achieving Objectives 1, 2, 3, 4, 5, 6, 7 and 9.**

## **Explanation**

- |   |   |
|---|---|
| <p><b>5.2.6</b> All development influences travel patterns either through new trips on the network or the re-routing of existing trips. This may occur on a micro-level by providing a single access point onto the highway network, or the macro-level where a range of infrastructure improvements are required to provide a range of travel choices for a Strategic Allocation.</p>  | <p><b>5.2.8</b> 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 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><b>5.2.7</b> 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 SD4 sets out the approach to sustainable travel modes and choice in new development in regards to masterplanning, design and layout.</p> |   |

**5.2.9** 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. 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.

**5.2.10** Where known air or noise quality issues exist and a significant increase in car-based travel is expected from a development, all relevant environmental assessments must be completed as part of the planning application process. Particular issues exist at congested junctions within urban areas and on routes with a high volume of slow-moving traffic. Gloucester, Cheltenham and Tewkesbury have declared five Air Quality Management Areas (AQMAs) under Section 83 of the Environment Act 1995 where Nitrogen Dioxide (NO<sub>2</sub>) exceedances occur due to traffic-related emissions.

### *Delivery*

**5.2.11** The policies will be implemented through the development management process.

**5.2.12** The County Council has provided a number of useful documents which provide advice for developers.

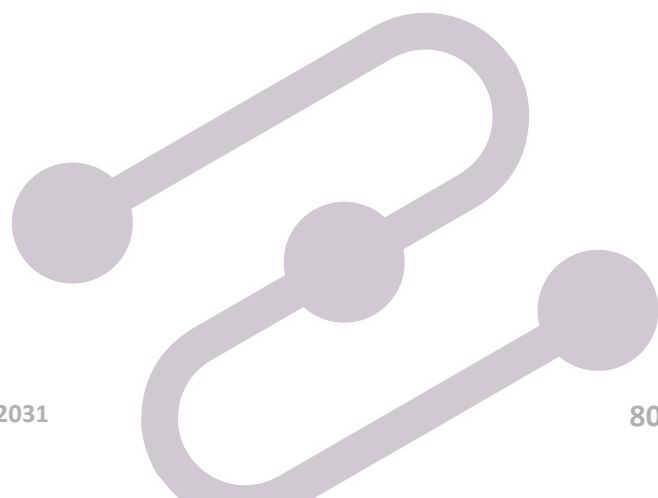
These are all available through Gloucestershire County Council's website ([www.gloucestershire.gov.uk](http://www.gloucestershire.gov.uk)) and are periodically updated and amended to ensure they remain fit for purpose.

- **The Transport Implementation Strategy (TIS)** - this strategy sits alongside the JCS providing important explanation and guidance on implementation for decision makers interpreting policies in the JCS, particularly INF1 and transport elements of policies SD4 (design) and SA1 (Strategic Allocations);
- **Local Transport Plan 2015-2031** – provides an overview of the strategic context of the transport network within the county, setting out strategy, policies and investment priorities. The LTP is a living document which will be updated and amended to reflect changing policy at the national and local level. This would enable the LTP to be responsive to any significant transport infrastructure needs that may arise through the JCS plan period, including future reviews;
- **Local Developer Guide 2013** – provides a brief overview for developers on the type of infrastructure considerations that should be taken into account when making a planning application;
- **Manual for Gloucestershire Streets and its appendices** – provides guidance to developers, their consultants and design engineers, local planning authorities, Parish and Town Councils and the public, on how new development within Gloucestershire can contribute towards the provision of a safe and sustainable transport network within the County.

# INF2 – FLOOD RISK MANAGEMENT

## Background

- 5.3.1** Flooding is a significant issue in the JCS area, which covers parts of the Severn and Avon rivers as well as a large number of smaller watercourses. A considerable amount of the land in the west of the area is part of the functional floodplain. The Rivers Severn and Avon pose the greatest flood risk within Tewkesbury, particularly during periods of high flows at the place where the two watercourses meet. Nearly all the borough area drains into the Severn, with the exception of small areas in the far east of the borough which ultimately drain into the Thames. Flooding from surface water is also a problem as the draining of surface water is closely linked to main river levels, with the largely impermeable geology and gentle topography of the borough contributing to increased likelihood of surface water flooding.
- 5.3.2** The majority of flood risk in Gloucester City arises from the smaller river catchments. While the Severn is capable of coming out of its bank and flooding a large area, flood risk is reduced by the presence of defences. Nevertheless, the Severn may contribute to flooding as the effects of high flows in the smaller streams may be worsened by the elevated levels in the Severn, making it difficult for them to discharge. As part of its ongoing commitment to reducing flood risk within the county all participating councils will, subject to meeting other national and local policy objectives, support any development that contributes physically or financially to the delivery of any proposed flood alleviation plans or schemes that have a wider benefit to communities at risk within the Plan area.
- 5.3.3** Cheltenham Borough occupies a low-lying urban area of the lower Severn catchment. Of particular relevance is the River Chelt, which flows through the centre of Cheltenham and is regulated by a flood alleviation scheme. The high degree of urbanisation, coupled with the small size of the catchments and impermeable underlying rock, mean that the greatest flood risk in the area is from surface water overloading of the old drainage system, particularly during intense rainfall events.





## Policy INF2: Flood Risk Management

- 1. Development proposals must avoid areas at risk of flooding, in accordance with a risk-based sequential approach. Proposals must not increase the level of risk to the safety of occupiers of a site, the local community or the wider environment either on the site or elsewhere. For sites of strategic scale, 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**
- 2. Minimising the risk of flooding and providing resilience to flooding, taking into account climate change, will be achieved by:**
  - i. Requiring new development to, where possible, contribute to a reduction in existing flood risk;**
  - ii. Applying a sequential test for assessment of applications for development giving priority to land in Flood Zone 1, and, if no suitable land can be found in Flood Zone 1, applying the exception test;**
  - iii. Requiring new development that could cause or exacerbate flooding to be subject to a flood risk assessment which conforms to national policy and incorporates the latest available updates to modelling and climate change data and historic data and information and guidance contained in the authorities' Strategic Flood Risk Assessments and Supplementary Planning Documents, in order to demonstrate it will be safe, without increasing flood risk elsewhere;**
  - iv. Requiring new development to incorporate suitable Sustainable Drainage Systems (SuDS) where appropriate in the view of the local authority to manage surface water drainage: to avoid any increase in discharge into the public sewer system; to ensure that flood risk is not increased on-site or elsewhere; and to protect the quality of the receiving watercourse and groundwater. Where possible, the authorities will promote the retrofitting of SuDS and encourage development proposals to reduce the overall flood risk through the design and layout of schemes which enhance natural forms of drainage. Developers will be required to fully fund such mitigation measures for the expected lifetime of the development including adequate provision for ongoing maintenance;**
  - v. Working with key partners, including the Environment Agency and Gloucestershire County Council, to ensure that any risk of flooding from development proposals is appropriately mitigated and the natural environment is protected in all new development.**

**This policy contributes towards achieving Objective 6.**

### Explanation

**5.3.4** The NPPF seeks to ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas of high risk. Accordingly, in proposing strategic site allocations to meet demand for development, the JCS authorities have applied a sequential, risk-based approach to avoid, where possible, flood risk to people and property and to manage any residual risk, taking account of the impacts of climate change.

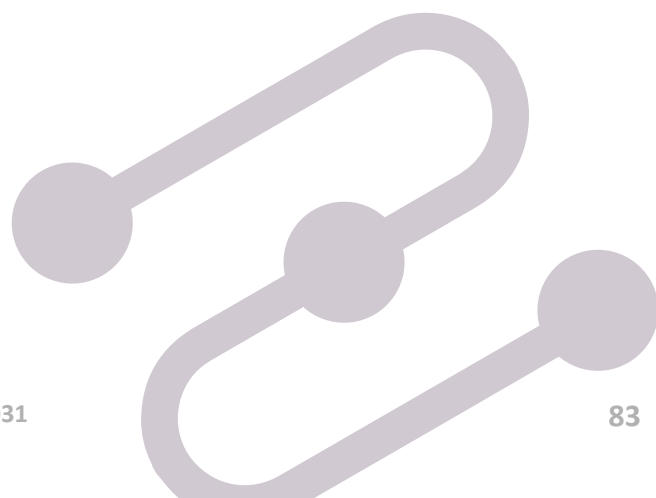
**5.3.5** The Environment Agency regularly updates the 'Flood Map for Planning' showing areas at high (1 in 100 year), medium (1 in 1,000 year) and low (less than 1 in 1,000 year) risk of flooding (these are Flood Zones 3, 2 and 1 respectively).

To complement these maps, Gloucestershire County Council, the Lead Local Flood Authority (LLFA), prepared a SFRA Level 1 for the county (September 2008). This assessed all 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.

- 5.3.6** To provide more site-specific information, SFRA Level 2 reports were commissioned by the JCS authorities. These involved a more detailed review of flood hazard (flood probability, flood depth, flood velocity, rate of onset of flooding), taking into account the presence of flood risk management measures such as flood defences. In doing this, the JCS authorities have applied the definitions used in the Flood and Water Management Act 2010.
- 5.3.7** To ensure that flood information is up to date when taking planning decisions about flood risk, planning allocations will be required to ensure that the modelling and flood flows used to justify the flood zones set out in any application take account of updates and changes to the models used. Particular regard should be had to changes and updates to models relating to rainfall predictions and climate change data.
- 5.3.8** As an overarching principle, all new development should seek to provide an overall reduction in flood risk. The risk of flooding can be reduced by:
- Using a sequential approach to determining the suitability of land for development;
  - Ensuring that all flood risk management infrastructure is maintained over a development's lifetime;
  - Seeking to ensure that watercourses are left in open space and are well integrated into existing Green Infrastructure wherever possible;
  - 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 underground water storage tanks may not necessarily be suitable or desirable. Developers will need to think creatively about the most sustainable SuDS solutions, taking into account principles of good design and the effect of the scheme on the development as a whole and its surroundings. For more information see the LLFA guidance on SuDS;
  - Where a Surface Water Management Plan shows the presence of pluvial flooding, the development will need to compensate for the pluvial flood volume lost by providing additional flow and storage capacity within the developments surface water drainage system and attenuation storage;
  - Ensuring that all flood management designs which form part of planning applications are fully implementable and free from legal or design impediments which are likely to affect their usefulness;
- Considering and acting on the cumulative impact of existing and new development, for example: Ensuring that works to raise the highway levels where the highway is subject to fluvial flooding will only be permitted if provision is made at the same time to provide additional flood flow capacity under the highway to ensure no adverse impacts upstream.
- This list is not exhaustive.
- 5.3.9** The cumulative impact of development of strategic scale will need to be considered as part of the site-specific development management process. This cumulative assessment is most appropriate at the sub-catchment scale, where development areas have the potential to influence downstream flows that could impact existing settlements, or permitted or allocated developments. The vulnerability of development from other sources of flooding will be considered as well as the effect of the new development on surface water run-off.
- 5.3.10** Construction that is resilient (rather than resistant) is favoured because it can be achieved more consistently and is less likely to encourage occupiers to remain in buildings that could be inundated by rapidly-rising water levels. Flood resistance and resilience measures should not be used to justify development in inappropriate locations, and in isolation are unlikely to make all types of development safe.
- 5.3.11** The JCS authorities will, in principle, support measures proposed by the Environment Agency and others to reduce flood risk, including increasing the quality / quantity of the floodplain, defending areas at risk of flooding, and restoring culverted watercourses back to open channels. This will help to reduce flood risk to counteract the increased threat of flooding through climate change, and provide environmental benefits.

### *Delivery*

- 5.3.12** The NPPF sets out the requirement to adopt a sequential, risk-based approach to the location of development at risk of flood.
- 5.3.13** National Planning Policy Guidance (PPG) requires that, where necessary, the Exception Test should now be applied in the circumstances set out in the Flood Risk and Coastal Change section of that document.
- 5.3.14** In addition to the formal Sequential Test, the NPPF sets out the requirement for developers to apply the sequential approach to locating development within the site.
- 5.3.15** Developers should carefully follow guidance from the Environment Agency and Gloucestershire County Council, as well as that contained in the Development Plan, on the correct way to demonstrate that the exception and sequential tests have been properly applied.
- 5.3.16** Large-scale development should contribute to meeting with the objectives of the EU Water Framework Directive in line with the Severn River Basin Management Plan.
- 5.3.17** 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'.



# INF3 – GREEN INFRASTRUCTURE

## Background

- 5.4.1** The term ‘green infrastructure’ is used to describe the network of high-quality green spaces, watercourses and other environmental features in an area. Because of the value of green infrastructure, individual features are often described as ‘assets’. These assets may be large or small, natural or man-made, ranging from expansive natural landscapes to individual trees and green roofs.
- 5.4.2** Strategic green infrastructure assets in the JCS area include The Cotswolds AONB, the River Severn and its washlands, and strategic corridors between major assets and populations including rivers, floodplains, pedestrian and cycle routes.
- 5.4.3** Local green infrastructure assets include but are not limited to public parks, private gardens, recreation grounds, amenity space, play space, allotments, woodlands and orchards.
- Linear features such as Public Rights of Way, local cycle paths, footpaths, bridleways, railway embankments, roadside verges, hedgerows, rivers, brooks and the floodplain are particularly important for connectivity. Finally, individual features, including trees, make a valuable contribution to the network.
- 5.4.4** All development, including development at Strategic Allocations, should make a positive contribution to green infrastructure in the JCS area, helping to establish and reinforce networks for ecology, recreation and active travel that are resilient to current and future pressures including climate change. The purpose of this policy is to ensure that individual assets and the integrity and connectivity of the network are planned, protected and enhanced, recognising that networks extend across local authority boundaries at landscape scale.

## Policy INF3: Green Infrastructure

- 1. The green infrastructure network of local and strategic importance will be conserved and enhanced, in order to deliver a series of multifunctional, linked green corridors across the JCS area by:**
  - i. Improving the quantity and / or quality of assets;**
  - ii. Improving linkages between assets in a manner appropriate to the scale of development, and**
  - iii. Designing improvements in a way that supports the cohesive management of green infrastructure;**
- 2. Development proposals should consider and contribute positively towards green infrastructure, including the wider landscape context and strategic corridors between major assets and populations. Where new residential development will create, or add to, a need for publicly accessible green space or outdoor space for sports and recreation, this will be fully met in accordance with Policy INF4. Development at Strategic Allocations will be required to deliver connectivity through the site, linking urban areas with the wider rural hinterland**
- 3. Existing green infrastructure will be protected in a manner that reflects its contribution to ecosystem services (including biodiversity, landscape / townscape quality, the historic environment, public access, recreation and play) and the connectivity of the green infrastructure network. Development proposals that will have an impact on woodlands, hedges and trees will need to include a justification for why this impact cannot be avoided and should incorporate measures acceptable to the Local Planning Authority to mitigate the loss. Mitigation should be provided on-site or, where this is not possible, in the immediate environs of the site**
- 4. Where assets are created, retained or replaced within a scheme, they should be properly integrated into the design and contribute to local character and distinctiveness. Proposals should also make provisions for future maintenance of green infrastructure.**

***This policy contributes towards achieving Objectives 4, 6, 7 and 9.***

## Explanation

- 5.4.5** According to Natural England, green infrastructure needs to be planned and delivered at all spatial scales from national to neighbourhood levels. The greatest benefits will be gained when this network is designed and managed as a multi-functional resource, capable of delivering a wide range of environmental and quality of life benefits (ecosystem services) for local communities. These include social and health benefits associated with recreational space, walking and cycling networks and opportunities for social interaction; environmental benefits such as enhanced biodiversity and flood mitigation; and economic benefits associated with an environment that is attractive to residents, visitors and investors. Design and management of the green infrastructure network should also respect and enhance the character and distinctiveness of an area with regard to habitats and landscape types.
- 5.4.6** The JCS authorities have produced a Green Infrastructure Strategy based on an assessment of the area's environmental assets. The strategy identifies two key regional / sub-regional green infrastructure assets in the area: The Cotswolds AONB to the east and the River Severn and its washlands to the west. The River Severn area has been promoted by the JCS authorities as a potential Regional Park. This would recognise the special habitat qualities of the area as well as its importance for the quiet enjoyment of the countryside. Below this, at an intermediate level, the strategy seeks to link these two assets and the main urban areas through a number of green corridors, most of which are watercourses. At a local level, the strategy identifies watercourse corridors as key green infrastructure assets in the urban areas. Ideally, all green infrastructure should link with these areas and form a co-ordinated network. The Green Infrastructure Strategy therefore includes a vision that everyone living in the JCS area can, within 300 metres (five minutes' walk-time), access a green infrastructure corridor or asset. From there, people will be able to travel through interconnected and multi-functional green spaces to ultimately emerge into the strategic assets of The Cotswolds AONB or the Severn and its washlands.
- 5.4.7** Enhancement of green infrastructure and ecological networks will require existing assets to be retained (where appropriate), improved and better managed, and new features to be created. It is recognised that the growth to be delivered through the JCS may increase demands on green spaces through increased recreational use.
- This will require careful management, particularly for ecologically sensitive sites. This could include requiring developer contributions for such provision (for example, a contribution towards the management of the Cotswolds Beechwoods Special Area of Conservation [SAC]). The JCS authorities will work together with key stakeholders, such as Natural England and the Environment Agency, to develop management and mitigation packages for important green and ecological networks and to discuss how future development can contribute to this. Policy on developer contributions is set out in Policy INF7. New green infrastructure should combine with established green spaces to thread through and surround the built environment, connecting urban areas and villages with the natural and agricultural areas beyond. This will require delivery of both large- and small-scale interventions at local, intermediate and strategic / landscape level. Development at Strategic Allocations will need to deliver connectivity through the site, linking urban areas with the wider rural hinterland.
- 5.4.8** As green infrastructure networks are enhanced by new development, it is important that other incidental green infrastructure assets are not lost or allowed to deteriorate. These include private gardens, cemeteries and allotments which will not all be identified on proposals maps but are nevertheless an essential element of the wider green infrastructure network.

## Delivery

- 5.4.9** Delivery of a comprehensive green infrastructure network across the JCS area will require a co-ordinated approach to implementing improvements associated with new developments. This will be pursued in the context of Gloucestershire's Strategic Green Infrastructure Framework and the JCS Green Infrastructure Strategy. The JCS local authorities will work with their neighbours beyond the JCS area to deliver green infrastructure improvements in cross-boundary locations.
- 5.4.10** Delivery will be achieved primarily through the development management process. This will include landscaping, trees and other planting that meets the requirements of Policy SD4. Innovative features such as green roofs and living walls can also contribute to the network. Where new development creates a need for publicly-accessible green space, developers will need to make provision in accordance with Policy INF4.

- 5.4.11** Moving towards achieving the vision of the Green Infrastructure Strategy will require each development proposal to consider how it can contribute to improving connectivity in the network. Key linkages between areas of green infrastructure will be targeted through the JCS-wide Strategic Green Infrastructure Map and the urban area green infrastructure maps contained in the Green Infrastructure Strategy. Proposals that improve the accessibility of the green infrastructure network for sports, play and travel, for example by creating, improving or extending footpaths, bridleways and cycling links, will therefore be encouraged. Accessibility improvements should take account of the need to protect the ecological function of these corridors in accordance with Policy SD9.
- 5.4.12** Where specific policies are required to designate and protect local green infrastructure assets (such as public parks, sports pitches, allotments or local green space), these will be included in District plans and illustrated on associated Policies Maps. Other detailed policies relating to green infrastructure provision and protection, such as tree-planting requirements and Tree Preservation Orders, will also be contained in District plans where necessary. Ancient woodland and veteran trees will be protected in accordance with the NPPF.
- 5.4.13** 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.
- 5.4.14** Mechanisms and funding streams associated with other countywide and local strategies will help to secure improvements to green infrastructure. These include strategies for parks and open spaces, biodiversity / nature conservation and local transport. Landscape-scale projects that support the delivery of Policy SD9 will particularly be encouraged. Proposals that enable the expansion, buffering and re-connection of native and ancient woodland will also be encouraged.
- 5.4.15** District plans may include policy or guidance on making provision for play space or improvements to recreational provision associated with growing populations.

# INF4 – SOCIAL & COMMUNITY INFRASTRUCTURE

## Background

- 5.5.1 Everyone living and working in the JCS area should have access to facilities that meet their everyday needs. Essential social and community infrastructure includes schools, health services, community and spiritual centres, libraries, sports pitches, open space, and children’s crèche and play provision. Other cultural and sports facilities, such as museums, galleries and entertainment venues, serve the community whilst also providing an important tourist attraction. By bringing people together and providing opportunities for social and physical activity, all these facilities contribute to quality of life, health and well-being in the area.

## Policy INF4: Social and Community Infrastructure

- 1. Proposals to develop land or buildings currently or previously in use as a community facility will demonstrate, including evidence of engagement with relevant local community groups and partner organisations, why the facility is no longer required and, as appropriate, how, when and where suitable local replacement facilities will be provided. Provision of replacement facilities will have regard to the locational and other relevant elements of this policy**
- 2. Where new residential development will create, or add to, a need for community facilities, it will be fully met as on-site provision and / or as a contribution to facilities or services off-site. New or refurbished provision will be of an appropriate type, standard and size. From an early stage, developers will be expected to engage with the relevant local authorities and infrastructure providers and, as appropriate, relevant local community groups where they exist, to ensure that new provision meets the needs of the community that it will serve and is fit for purpose**
- 3. Social and community infrastructure should be centrally located to the population it serves and be easily accessible on foot and by bicycle. It should be located so as to have the potential to be well-served by public transport. Developers should aim to provide flexible, multifunctional facilities within mixed-use developments, creating shared space which maximises benefits to the community and minimises land-take. In the case of open space, ‘easily accessible’ means it is located within reasonable walking distance of the development it serves. New facilities should be accessible to all members of the community, and be planned and phased in parallel with new development.**

***This policy contributes towards achieving Objectives 6, 7, 8 and 9.***

## Explanation

- 5.5.2 By providing and helping to maintain social and community infrastructure, development has an important role in promoting social well-being and creating healthy, inclusive communities. For the purpose of this policy and having regard to the JCS IDP, infrastructure in this respect includes facilities for education and training, health and social care, community and culture, village halls, local shops and pubs, libraries, places of worship, major sporting attractions, leisure centres and children’s play provision. Infrastructure for health, social care and education are essential community facilities that will need to be assessed in accordance with the NPPF.

**5.5.3** It is important that new development, which will add to the combined needs of the community, contributes to new or expanded facilities to ensure that these additional needs are met. For provision to be sufficient and timely, it must be brought forward in parallel with new housing and other development so that facilities are available for use when needed. Where new development occurs in areas of inequality or undersupply, there may be opportunities to re-connect the area and provide wider benefits. Developers should therefore take opportunities where they exist to integrate new provision with existing facilities (for example, by extending a facility) or to provide it in a location that is accessible to residents of neighbouring areas with identified needs.

**5.5.4** The right location for a community facility will depend on its scale and function. Facilities that serve the day-to-day needs of a community should be located in local centres close to the communities that they serve and should be fully accessible and inclusive. The location of higher-level facilities, such as leisure centres, should be highly accessible to all members of the community and, where possible, should be directed to an allocated site or an appropriate site in an area of undersupply. All facilities should be accessible by walking, cycling and public transport. Mixed-use development can help to ensure that housing and businesses are close to services and that neighbourhoods are safe, lively and well-maintained. Facilities that are flexible and perform a range of functions can also help to generate higher levels of activity whilst making more efficient use of land.

**5.5.5** As stated in the introduction, social and community infrastructure is vitally important in ensuring the quality of life and well-being of communities. For this reason, the redevelopment of a community facility will only be acceptable in certain circumstances; for example, where the facility will be replaced, or where it can satisfactorily be demonstrated that there is no current or future need or demand, or where a marginal loss will result in improvement or provision of a complementary use. Proposals to build on existing sports and recreational buildings or land should be considered in accordance with the criteria in the NPPF.

### *Delivery*

**5.5.6** Delivery will primarily be through the development management process. Through preparation and implementation of the JCS IDP, the three JCS councils, Parish Councils and Neighbourhood Forums will continue to work collaboratively with infrastructure providers, developers and partnership groups to ensure that social and community infrastructure needs of existing and future communities are met. Existing social sustainability initiatives including the partnership between Cheltenham Borough Homes, the Barnwood Trust, Bromford and Sovereign, as well as the Asset Based Community Development (ABCD) initiative at Gloucester city, will be taken forward by the JCS authorities, including through the district level plans.



# INF5 – RENEWABLE ENERGY / LOW CARBON ENERGY DEVELOPMENT

## Background

- 5.6.1** Renewable energy is energy that has been derived from natural resources that are generally regenerative or are practically inexhaustible. As well as the more usual renewable technologies such as wind and solar, there is potential for hydro, biomass and biogas. Some of these technologies, such as biogas, provide opportunities for rural employment as well as biodiversity and landscape benefits.
- 5.6.2** Some renewable energy technologies, such as ground source heat pumps and solar panels, can easily form part of a range of sustainable design and construction measures (set out in Policy SD3) and should be readily incorporated into new developments wherever possible, taking into account the other policies in this plan.
- 5.6.3** 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.
- 5.6.4** The drive for renewable / low carbon sources of energy is not just about reducing greenhouse gas emissions; it also concerns a more secure energy market, long-term cheaper energy costs, and importantly for the JCS, retaining money within the local economy. Installation of plant can also support local job creation.
- 5.6.5** Policy INF5 applies to proposals concerning renewable energy or low carbon energy-generating technologies, including biomass generators, anaerobic digestion plants and other energy from waste technologies, hydropower turbines, and ground-mounted solar photovoltaic arrays. The one exception to this is with wind turbines. Locations for these, unless government guidance changes to the contrary, will be allocated through district level plans or neighbourhood plans where appropriate.

## Policy INF5: Renewable Energy/Low Carbon Energy Development

- 1. Proposals for the generation of energy from renewable resources, or low carbon energy development (with the exception of wind turbines), will be supported, provided the wider environmental, social or economic benefits of the installation would not be outweighed by a significant adverse impact on the local environment, taking into account the following factors:**
  - i. The impact (or cumulative impact) of the scheme, including any associated transmission lines, buildings and access roads, on landscape character, local amenity, heritage assets or biodiversity;**
  - ii. Any effect on a protected area such as The Cotswolds AONB or other designated areas such as the Green Belt;**
  - iii. Any unacceptable adverse impacts on users and residents of the local area, including emissions, noise, odour and visual amenity;**
- 2. Proposals are more likely to be supported when they demonstrate:**
  - i. That they have been designed and sited so as to minimise any adverse impacts on the surrounding area;**
  - ii. Benefits arising directly from the scheme to the local economy, the community and achievement of national targets;**
  - iii. The feasibility and cost-effectiveness of removing any installation and re-instatement of the site in future years;**
  - iv. The net gain of carbon savings, taking into account carbon use through manufacturing and installation of the technology.**

**This policy contributes towards achieving Objectives 1, 3, 4 and 6.**

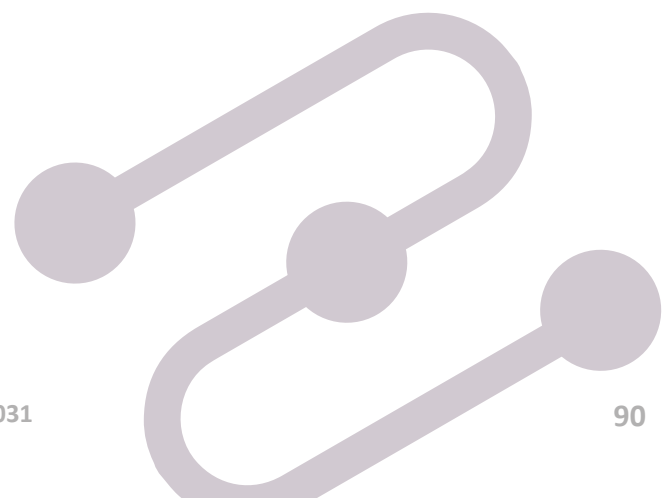
## Explanation

- 5.6.6** The Government has adopted ambitious targets for renewable energy generation. Nationally the expectation is that we will generate 15% of our total energy demand through renewable sources by 2020. This is total energy that includes heat and transport. To achieve this, a step change in the take-up of renewables will be needed, and the planning system has a key role to play in this. There are more ambitious targets for 2030 and beyond.
- 5.6.7** The NPPF makes clear that planning plays a key role in reducing greenhouse emissions and supporting the delivery of renewable and low carbon-associated infrastructure. Amongst other things, local planning authorities should have a positive strategy to promote renewable and low carbon energy, have policies that maximise renewables and low carbon development while ensuring their adverse impacts are satisfactorily addressed, and give support to community-led initiatives.
- 5.6.8** The NPPF suggests that local planning authorities consider identifying suitable areas for renewable energy. Gloucestershire County Council commissioned ENTEC to undertake a study into renewable energy capacity across the county in 2010. It 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.

## Delivery

- 5.6.9** Other than through the technologies incorporated into buildings, design and sustainable construction, delivery of renewable energy development will be through the private sector bringing forward proposals for commercial renewable or low carbon energy generation. This may be significantly influenced by the incentive regimes that are in place at a national level, whether for heat or electricity.
- 5.6.10** The JCS authorities will work in partnership with Gloucestershire County Council, the LEP and other partner organisations, to identify and take advantage of opportunities to increase renewable energy generation, such as the potential for providing combined heat and power to new development, wherever it is compliant with the other policies in this plan.
- 5.6.11** Development management decision-taking will reflect the value and priority attached to moving towards a low-carbon economy and more sustainable energy generation.



# INF6 – INFRASTRUCTURE DELIVERY

## Background

**5.7.1** Government says that 'Infrastructure is the foundation upon which our economy is built. The government remains determined to deliver better infrastructure in the UK to grow the economy and improve opportunities for people across the country.' (National Infrastructure Delivery Plan 2016–2021 Executive Summary).

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.

## Policy INF6: Infrastructure Delivery

- 1. Where infrastructure requirements are generated as a result of individual site proposals and / or having regard to cumulative impact, new development will be served and supported by adequate and appropriate on- and / or off-site infrastructure and services. In identifying infrastructure requirements, development proposals will also demonstrate that full regard has been given, where appropriate, to implementing the requirements of the Joint Core Strategy Infrastructure Delivery Plan**
- 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 infrastructure which is necessary, directly related, and fairly and reasonably related to the scale and kind of the development proposal, including:**
  - i. Broadband infrastructure;**
  - ii. Climate change mitigation / adaptation;**
  - iii. Community and cultural facilities and initiatives;**
  - iv. Early Years and Education;**
  - v. Health and well-being facilities and sport, recreation and leisure facilities;**
  - vi. The highway network, traffic management, sustainable transport and disabled people's access;**
  - vii. Protection of cultural and heritage assets and the potential for their enhancement;**
  - viii. Protection of environmental assets and the potential for their enhancement;**
  - ix. Provision of Green Infrastructure including open space;**
  - x. Public realm;**
  - xi. Safety and security including emergency services.**

*This list of potential infrastructure items is neither exhaustive, sequential nor are its elements mutually exclusive*

- 3. Priority for provision will be assessed both on a site-by-site basis and having regard to the mitigation of cumulative impact, together with implementation of the JCS Infrastructure Delivery Plan**
- 4. Planning permission will be granted only where sufficient provision has been made for infrastructure and services (together with their continued maintenance) to meet the needs of new development and / or which are required to mitigate the impact of new development upon existing communities. Infrastructure and services must be provided in line with an agreed, phased timescale and in accordance with other requirements of this Plan.**

***This policy contributes towards achieving all the JCS Strategic Objectives.***

## *Explanation*

**5.7.2** Growth and development can have a significant impact upon existing infrastructure and services in an area. It is critical that new proposals integrate as seamlessly as possible with existing provision so that local communities are not unacceptably disturbed, disadvantaged or disrupted, environmental impact is minimised, and the efficiency and competitiveness of the economy is not compromised. The Infrastructure Delivery Plan (IDP), which underpins and accompanies the JCS, sets out the infrastructure that is required to ensure that these objectives are upheld. Operating within a plan-led system, developers are therefore required to encompass implementation of the IDP within their proposals.

**5.7.3** The JCS proposes, in Policies SP1 and SP2, a significant level of growth to 2031 and beyond. Strategic Allocations are proposed for several major development sites that are likely to generate the need for new infrastructure and services to be provided on site and in an integrated manner. In addition, the JCS also recognises the potential impact of smaller-scale proposals that cumulatively will have an impact upon the existing provision and pattern of infrastructure within the area. For this reason, the policy incorporates the potential requirement for 'off-site' infrastructure as well as dedicated, on-site provision within a development.

**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, that is fully justified within the planning application, may be acceptable. Nevertheless, if sufficient provision cannot be adequately demonstrated both in terms of infrastructure items and necessary maintenance, planning permission is likely to be refused. For the avoidance of doubt, references to 'new development' include development of all scales and types.

## *Delivery*

### **5.7.5**

This policy will primarily be delivered through the development management process. Prospective developers should begin identification of infrastructure requirements at an early stage in the formulation of a proposal, seeking advice and guidance from infrastructure providers, local authorities and local communities where necessary. This includes the Gloucestershire County Council 'Local Developer Guide: Infrastructure & Services with New Development' (adopted February 2013). There are several policies elsewhere in the JCS that directly or indirectly relate to the provision of infrastructure. Developers should read the JCS as a whole.

# INF7 – DEVELOPER CONTRIBUTIONS

## Background

- 5.8.1** Planning obligations under Section 106 of the Town and Country Planning Act 1990 are used to mitigate harm that may be caused by a development. Obligations are negotiated as part of the planning application process, either as unilateral undertakings or as agreements. The Act enables local planning authorities and developers to negotiate a range of obligations, which can be linked to financial contributions, be restrictive in nature, or require specific works or actions to take place.
- 5.8.2** The Planning Act 2008 and relevant regulations also make provision for a Community Infrastructure Levy (CIL). Following a formal preparation process that includes viability analysis of the plan as well as independent public examination and through setting a charging schedule that sets out local tariffs, CIL empowers local planning authorities to make standard charges on all new development over a certain threshold.
- 5.8.3** The JCS authorities will continue to use S106 planning obligations during a transitional period when consideration is given by each of the three constituent authorities to the introduction of a CIL system. Even where CIL is introduced, it is likely that the S106 mechanism will be retained for use in securing site-specific obligations and particularly in respect of affordable housing.

## Policy INF7: Developer Contributions

- 1. Arrangements for direct implementation or financial contributions towards the provision of infrastructure and services required as a consequence of development, including its wider cumulative impact, and provision where appropriate for its maintenance, will be negotiated with developers before the grant of planning permission. Financial contributions will be sought through the S106 and CIL mechanisms as appropriate**
- 2. Where, having regard to the on- and / or off-site provision of infrastructure, there is concern relating to the viability of the development, an independent viability assessment, funded by the developer and in proportion with the scale, nature and / or context of the proposal, will be required to accompany planning applications. 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.**

***This policy contributes towards achieving all of the JCS Strategic Objectives.***

## Explanation

- 5.8.4** To secure the best use of land, the JCS authorities need to ensure, through the use of conditions and planning obligations attached to planning permissions, that new development provides for the infrastructure, facilities, amenities and other planning benefits which are necessary to support and serve it, and to offset any consequential or potential loss to the local area which may result from the development.

**5.8.5** The JCS authorities recognise that economic viability of development can be finely balanced, particularly where significant infrastructure requirements are identified as being needed to make the proposal acceptable to the Local Planning Authority. The balance may be particularly sensitive in respect of redevelopment of brownfield land and, where evidence is available, the Local Planning Authority will be mindful of that in those cases. It is in the interests both of the Local Planning Authority and the developer that an independent viability assessment is undertaken to enable an objective appraisal to inform negotiations. Whilst the JCS authorities recognise that the viability assessment needs to be proportionate with the nature and scale of the proposal, it should not be assumed that only 'major' development as defined in regulations will be subject to this requirement. It will be a matter for the Local Planning Authority to decide, on a case-by-case basis, the requirement for and scope of viability assessment.

**5.8.6** 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. Publication of viability assessments will be required in full for non-compliant schemes except in exceptional circumstances when it can be proven that publication of certain specific information would harm the commercial confidentiality of the developer to no public benefit.

#### *Delivery*

**5.8.7** This policy will primarily be delivered through the development management process. Early engagement with the Local Planning Authority at pre-application stage is encouraged. Developers may note in this respect that Gloucestershire County Council has adopted a 'Local Developer Guide: Infrastructure & Services with New Development' (February 2013) that relates to infrastructure requirements and associated matters for which it is responsible.



# PART 6

## - Strategic Allocations

### ***POLICY SA1 – STRATEGIC ALLOCATIONS POLICY***

#### ***Background***

**6.1.1** 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 seven Strategic Allocations on the edges of existing urban areas is an important part of the delivery of the JCS as a whole.

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.

**6.1.2** Policy SA1 formally designates these seven 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.

**6.1.3** The Strategic Allocations Report details the process by which the approximate capacity of the sites in Table SA1 was calculated, except for allocations at Twigworth, Winneycroft and West Cheltenham. The capacity of these sites has been informed through the JCS evidence base as it progressed after submission. The approach took into account extensive work carried out over a number of years on the developable areas within these allocation boundaries. Once these areas were identified, the yield of housing predicted to arise from the site was reduced to take into account infrastructure and green space requirements. These reductions in yield are in addition to reductions made to allow for areas already identified solely for green infrastructure within the allocation boundaries. Where available,

## Policy SA1: Strategic Allocations Policy

- 1. New development will be provided within Strategic Allocations in order to deliver the scale and distribution of development set out in Policies SP1 and SP2***
- 2. The Strategic Allocations are listed in Table SA1 and delineated on Plans A1-A7 below and are marked on the policies map. The red lines on Plans A1–A7 mark the boundaries of the allocations and are separately and collectively part of this policy***
- 3. Each Strategic Allocation is supported by site specific policies A1-A7 below to provide further detailed guidance on the development of these sites. These site policies also form part of this policy***
- 4. Development proposals should enable a comprehensive scheme to be delivered across the developable area within each Strategic Allocation. Developers must ensure that the sites provide an appropriate scale and mix of uses, in suitable locations, to create sustainable developments that support and complement the role of existing settlements and communities***
- 5. Proposals must be accompanied by a comprehensive masterplan for the entire Strategic Allocation. This should demonstrate how new development will integrate with and complement its surroundings in an appropriate manner, in accordance with Policy SD4. The JCS authorities will be flexible in considering different approaches to achieving a comprehensive masterplan providing that proposals still take fully into account the development and infrastructure needs of the wider allocation and demonstrate that it would not prejudice the sustainable delivery of the entire allocation***
- 6. Strategic Allocations should seek in all cases to retain and enhance areas of local green space within the boundary of the allocation, which meet the criteria in the NPPF and relevant national guidance whilst delivering the scale and distribution of development required by this policy. This is in addition to the requirements of Policy INF3***
- 7. Infrastructure should be planned and provided comprehensively across the site taking into account 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 INF6 and INF7***
- 8. The transport strategy to support the delivery of Strategic Allocations should align with and where appropriate contribute to the wider transport strategy contained within the Local Transport Plan, including priority transport corridors and junctions. The development of Strategic Allocations must encourage the use of walking, cycling and the use of public transport and ensure that transport demands arising from the development can be effectively mitigated in accordance with Policy INF1.***

***This policy contributes towards achieving Objectives 1, 2, 4, 6, 7, 8 and 9.***



**Table SA1**

	Indicative Housing Site Total	Indicative Housing to be delivered up to 2031	Hectares of Employment Land to be delivered up to 2031
A1 Innsworth & Twigworth	2,295	2,295	9.1
A2 South Churchdown	1,100	1,100	17.4
A3 North Brockworth	1,500	1,500	3
A4 North West Cheltenham	4,285	4,285	23.4
A5 Ashchurch	N / A	N / A	14.3
A6 Winneycroft	620	620	N / A
A7 West Cheltenham	1,100	1,100	45
<b>Total</b>	<b>10,900</b>	<b>10,900</b>	<b>112.2</b>

**Explanation**

**6.1.4** Proposals for development at Strategic Allocations must have regard to all relevant planning policies in the plan as well as Policy SA1, including site specific policies A1-A7.

**Delivery**

**6.1.5** Development proposals concerning Strategic Allocations must be in accordance with the provisions of the Development Plan as a whole, including:

- Retained policies from the 2006 Cheltenham and Tewkesbury Local Plans and associated Supplementary Planning Documents and Guidance;
- Adopted or emerging Gloucester, Cheltenham or Tewkesbury District plans;
- Adopted or emerging Minerals or Waste Plans of Gloucestershire County Council;
- Emerging or adopted neighbourhood plans.

**6.1.6** 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 or neighbourhood plans in conformity with the JCS.

**Strategic Allocations, Policies & Maps**

**6.1.7** The red lines on each of the Strategic Allocations plans show the policy allocation area, and are drawn to follow identifiable boundaries such as roads and watercourses wherever available. Areas of land and buildings which may not be suitable or available for development or redevelopment are included within these boundaries. However, site allocations work has indicated that a development of the scale set out in Table SA1 will be achievable within these locations.

**6.1.8** 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.

**6.1.9** 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. 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.

## Policy A1 - Innsworth & Twigworth

*The Strategic Allocation identified at Innsworth & Twigworth (as shown on Policies map Plan A1) will be expected to deliver:*

- i. Approximately 2,295 new homes;*
- ii. Approximately 9 hectares of employment generating land;*
- iii. A local centre including the provision of an appropriate scale of retail, healthcare and community facilities to meet the needs of the new community;*
- iv. New primary and secondary education schools and facilities;*
- v. A green infrastructure network of approximately 100 hectares, corresponding with flood zones 2 and 3;*
- vi. Protection to key biodiversity assets, including a new nature reserve with the green infrastructure area to support the restoration of the SSSI and improve the ecology of the area to support restoration of the SSSI, improve the ecology of the area and contribute to water quality enhancements;*
- vii. Adequate flood risk management across the site and ensure that all more vulnerable development is located wholly within flood zone 1. This includes measures to reduce flood risk downstream through increasing storage capacity;*
- viii. Flood risk management will be a critical part of master planning the site in linking the Innsworth and Twigworth areas, avoiding overland flow routes and addressing surface water flooding. Detailed flood risk assessments must utilise the latest flood risk modelling information for the whole site and any other areas impacted by the development in terms of flood risk;*
- ix. A layout and form of development that respects the landscape character as well as the character, significance and setting of heritage assets and the historic landscape.*
- x. A layout and form that integrates, where appropriate, important hedgerows within the development;*
- xi. A layout and form that reduces the impact of electricity pylons and high voltage lines; with the siting of residential development being a particular consideration;*
- xii. Primary vehicle accesses from A38, Innsworth Lane and explore the potential for a new main junction onto the A40 to the south of the site;*
- xiii. The potential for a highway link through both the Innsworth and Twigworth sites linking the A38 and A40;*
- xiv. Measures necessary to mitigate the traffic impact of the site, including the use of travel plans to encourage the use of more sustainable transport modes;*
- xv. High quality public transport facilities and connections within and adjacent to the site;*
- xvi. Safe, easy and convenient pedestrian and cycle links within the site and to key centres, providing segregated links where practical.*

### *Plan A1 – Innsworth & Twigworth*

**6.1.10** This Strategic Allocation lies to the north of Gloucester and is bounded by Innsworth Lane and Innsworth Technology Park to the south, open countryside to the west, Down Hatherley Lane to the north, and Frogfurlong Lane and Imjin Barracks to the east.

The residential settlement of Innsworth lies to the south of the site and Twigworth and Down Hatherley to the north. The Hatherley Brook and its associated floodplain run through the centre of the site which also includes a Site of Special Scientific Interest.

## Policy A2 - South Churchdown

*The Strategic Allocation identified at South Churchdown (as shown on Policies map Plan A2) will be expected to deliver:*

- i. Approximately 1,100 new homes;*
- ii. Approximately 17 hectares of employment generating land;*
- iii. Provision of an appropriate scale of retail, healthcare and community facilities to meet the needs of the new community;*
- iv. Contribution to primary and secondary education schools and facilities;*
- v. A green infrastructure network of approximately 50 hectares, including protection and enhancement of visual linkages from Tinker's Hill and Churchdown through to Innsworth Ditch, and the safeguarding of Pirton Brake ancient woodland and buffer strip along the railway line. Habitat creation and management should complement the reserve at Horsbere flood management scheme to the immediate south of the Railway line and contribute to water quality enhancements;*
- vi. A landscape buffer along the route of the A40 and the railway line including the protection of views from Tinkers Hill / Churchdown Hill;*
- vii. Protection to key biodiversity assets, including Innsworth Ditch and the safeguarding of the ponds and associated biodiversity at Pirton Court;*
- viii. Adequate flood risk management across the site and ensure that all more vulnerable development is located wholly within flood zone 1;*
- ix. A layout and form of development that respects the landscape character, as well as the character significance and setting of heritage assets, and separation of the villages Churchdown, Innsworth, Longlevens and Elmbridge;*
- x. A layout and form of development that respects the character and setting of Pirton Farmhouse and Barn;*
- xi. A layout and form that reduces the impact of electricity pylons and high voltage lines; with the siting of residential development being a particular consideration;*
- xii. Primary vehicle accesses from B4063 Cheltenham Road East and Pirton Lane and explore the potential for a new access junction to the site from the A40;*
- xiii. Measures necessary to mitigate the traffic impact of the site, including the use of travel plans to encourage the use of more sustainable transport modes;*
- xiv. High quality public transport facilities and connections within and adjacent to the site*
- xv. Safe, easy and convenient pedestrian and cycle links within the site and to key centres, providing segregated links where practical. This should include enhancement of Sustrans Route 41 to extend the route through the site;*
- xvi. Safeguard land for an extension to the planned park and ride facility at Elmbridge.*

### *Plan A2 – South Churchdown*

**6.1.11** This Strategic Allocation lies to the south of Churchdown and Innsworth and is bounded to the west by the A40 and the A417, to the north by Innsworth, to the north east by Churchdown, and to the south by the mainline Gloucester-to-Cheltenham railway. The site is bisected by the A40 Golden Valley dual carriageway.

Part of the site is currently the subject of a planning application to the County Council for a Park and Ride facility at Elmbridge. Existing offices and a new emergency fire and ambulance response station are located adjacent to the Elmbridge Court roundabout at the west of the site. The heritage asset of Pirton Court lies to the north east of the site at Pirton Lane, and an historic orchard is located to the west of the site.

## Policy A3 - North Brockworth

*The Strategic Allocation identified at North Brockworth (as shown on Policies map Plan A3) will be expected to deliver:*

- i. Approximately 1,500 new homes;*
- ii. Approximately 3 hectares of employment generating land;*
- iii. Provision of an appropriate scale of retail, healthcare and community facilities to meet the needs of the new community;*
- iv. New primary and secondary education schools and facilities;*
- v. A green infrastructure network of approximately 27 hectares including provision across the A46 and along Court Road towards Churchdown and along Horsbere Brook;*
- vi. The retention of the small traditional orchard to the east of the allocation;*
- vii. A layout and form of development that respects the character, significance and setting of the heritage asset at Brockworth Court and integrates, where appropriate, historically important hedgerows within the development;*
- viii. Adequate flood risk management across the site and ensure that all more vulnerable development is located wholly within flood zone 1. Proposals should not adversely impact on the Horsebere Brook Flood Alleviation Scheme or the standard of protection it provides;*
- ix. Protection to key biodiversity assets, including facilitating the active management of Horsbere Brook for biodiversity and water quality enhancements;*
- x. Primary vehicle accesses from Delta Way, Valiant Way and Court Road;*
- xi. Measures necessary to mitigate the traffic impact of the site, including the use of travel plans to encourage the use of more sustainable transport modes;*
- xii. High quality public transport facilities and connections within and adjacent to the site*
- xiii. Safe, easy and convenient pedestrian and cycle links within the site and to key centres, providing segregated links where practical. Particular consideration should be given to the upgrading of the pedestrian and cycle crossing on Valiant Way between residential and employment areas.*

### *Plan A3 – North Brockworth*

**6.1.12** This Strategic Allocation lies to the north of Brockworth and is bounded to the south by Mill Lane and the existing built form of Brockworth and Hucclecote, to the west by the M5, to the north by the A417 dual carriageway, and to the east by the A46 Shurdington Road.

The site includes the designated heritage assets of Church of St George and Brockworth Court, and Roman and medieval archaeology is prevalent across the site. Two historic orchards are located within the site.

## Policy A4 - North West Cheltenham

*The Strategic Allocation identified at North West Cheltenham (as shown on Policies map Plan A4) will be expected to deliver:*

- i. Approximately 4,285 new homes;*
- ii. A 10 hectare B-class office park;*
- iii. 13 hectares of predominantly non B-Class employment generating land for local centre(s) including the provision of an appropriate scale of retail, healthcare and community facilities to meet the needs of the new community;*
- iv. New primary and secondary education schools and facilities;*
- v. A green infrastructure network of approximately 100 hectares which will conserve the River Swilgate and Hyde Brook corridors, protecting important trees and hedgerows where appropriate, and contribute to water quality enhancements;*
- vi. Protection to key biodiversity assets including through the development of a Biodiversity Management Plan;*
- vii. Adequate flood risk management across the site and ensure that all more vulnerable development is located wholly within flood zone 1;*
- viii. A layout and form of development that respects the landscape character and separation of the villages of Brockhampton, Elmstone Hardwicke, Swindon Village and Uckington.*
- ix. A layout and form that respects the character, significance and setting of heritage assets that may be affected by development;*
- x. A layout and form that respects areas of high landscape character and visual sensitivity, including key views into the site from the surrounding key visual and landscape receptors*
- xi. Primary vehicle accesses from the A4019 Tewkesbury Road, secondary access from Runnings Road / Manor Road, and public transport only access to Swindon Village via Quat Goose Lane;*
- xii. Measures necessary to mitigate the traffic impact of the site, including the use of travel plans to encourage the use of more sustainable transport modes;*
- xiii. High quality public transport facilities and connections within and adjacent to the site, including a multi-use transport hub with circa 350 parking spaces;*
- xiv. Safe, easy and convenient pedestrian and cycle links within the site and to key centres, providing segregated links where practical;*
- xv. Take into account of the indicative Local Green Spaces identified on the Policies Map with consideration of the special features of that area which make it suitable for this designation.*

### *Plan A4 – North West Cheltenham*

**6.1.13** This Strategic Allocation is located adjacent to the north-western edge of Cheltenham, north of the A4019 Tewkesbury Road and west of the Gallagher Retail Park, Kingsditch Industrial Estate and Swindon Village. The land is predominantly in mixed agricultural use.

There are a number of watercourses within the site boundary, including the Swilgate, Hyde Brook and Leigh Brook. Two watercourses that converge towards Elmstone Hardwicke have associated land within the functional floodplain.

## Policy A5 - Ashchurch

*The Strategic Allocation identified at Ashchurch (as shown on Policies map Plan A5) will be expected to deliver:*

- i. Approximately 14 hectares of employment generating land;*
- ii. A green infrastructure network of approximately 5 hectares including a green corridor along the route of the Tirlle Brook and a woodland belt at the southern boundary of the site to minimise harm to views from Oxenton Hill and contribute to water quality enhancements;*
- iii. Adequate flood risk management across the site and ensure that all more vulnerable development is located wholly within flood zone 1;*
- iv. Primary vehicle access from the A46 and a secondary access from Fiddington Lane;*
- v. Measures necessary to mitigate the traffic impact of the site, including the use of travel plans to encourage the use of more sustainable transport modes. This shall include consideration of the operation of the Strategic Road Network;*
- vi. Development that does not prejudice future highway improvements to the A46. This may include requirements to safeguard sufficient land to allow for the delivery of future highway infrastructure improvements around the A46 and M5 Junction 9;*
- vii. High quality public transport facilities and connections within and adjacent to the site. This may include measures that will help facilitate an enhanced rail passenger service from Ashchurch for Tewkesbury station and bus advantage measures along the A438 / A46 corridor where practical;*
- viii. Safe, easy and convenient pedestrian and cycle links within the site and to key centres and the railway station, providing segregated links where practical.*

### *Plan A5 – Ashchurch*

**6.1.14** This Strategic Allocation lies to the south and east of Junction 9 of the M5, immediately south of the A46. It is bounded to the east by the main railway line. The Tirlle Brook forms the southern boundary of the Strategic Allocation area.

The current land use is predominantly agricultural, whereas the adjacent area to the north of the site is characterised by existing employment uses.



## Policy A6 - Winneycroft

*The Strategic Allocation identified at Winneycroft (as shown on Policies map Plan A6) will be expected to deliver:*

- i. At least 620 new homes;*
- ii. A comprehensive green infrastructure network will be provided on site, including the provision of on-site allotments, a new on-site community orchard, and the retention of protected trees to support and improve the ecology of the area and contribute to water quality enhancements;*
- iii. Areas of informal and formal recreation space on-site including the provision of permanent changing facilities;*
- iv. Adequate flood risk management across the site, including betterment works to the Sudbrook to provide downstream attenuation and the potential for a sustainable drainage system for the M5 drainage to reduce the impact on the Sudbrook;*
- v. A layout and form that integrates, where appropriate, important hedgerows within the development;*
- vi. A layout and form that respects the landscape character of the edge of city setting and the transition to suburban and rural character to the south and east of the site and the Cotswold AONB;*
- vii. A layout and form that respects the setting of all heritage assets including Winneycroft Farm and the adjacent historic orchard area;*
- viii. A layout and form that reduces the impact of electricity pylons and high voltage lines; with the siting of residential development being a particular consideration;*
- ix. Primary vehicle accesses from Corncroft Lane and Winneycroft Lane;*
- x. Measures necessary to mitigate the traffic impact of the site, including the use of travel plans to encourage the use of more sustainable transport modes;*
- xi. High quality public transport facilities and connections within and adjacent to the site;*
- xii. Safe, easy and convenient pedestrian and cycle links within the site and to key centres and the wider green infrastructure network, providing segregated links where practical.*

### *Plan A6 - Winneycroft*

- 6.1.15** 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.

## Policy A7 – West Cheltenham

*The Strategic Allocation identified at West Cheltenham (as shown on Policies map Plan A7) will be expected to deliver:*

- i. Approximately 1,100 new homes;*
- ii. Approximately 45 hectares of B-class led employment land to be focussed upon a cyber security hub and other high technology and high 'Gross Value Added' generating development and ancillary employment uses;*
- iii. All development should be employment led, delivery of housing must be in tandem with employment development;*
- iv. A comprehensive masterplan and development strategy for the Strategic Allocation, set within the context of the safeguarded land at West Cheltenham, which includes:*
  - a) A delivery strategy for employment focussed land release*
  - b) A positive impact on the regeneration of neighbourhoods in west Cheltenham*
  - c) Integrates built form and a comprehensive network of accessible green infrastructure, including local green space. The network will incorporate and protect notable natural features, including the Hatherley Brook, the Fiddlers Green Key Wildlife Site and important trees and hedgerows, and contribute to water quality enhancements.*
- v. Vehicle accesses from Fiddlers Green Lane and B4634 Old Gloucester Road and facilitate links to the M5 J10 for strategic movements to and from the site;*
- vi. Measures necessary to mitigate the traffic impact of the site, including the use of travel plans to encourage the use of sustainable transport modes;*
- vii. High quality public transport facilities and connections within and adjacent to the site.*
- viii. Safe, easy and convenient pedestrian and cycle links within the site, to key centres and with neighbouring existing development and the wider green infrastructure network;*
- ix. A distribution of development that takes account of the proximity of the Hayden sewage treatment works and incorporates appropriate spatial planning arrangements and mitigation measures designed to minimise material impacts on residential properties and commercial premises. Development which is likely to be significantly affected by odours will not be permitted within the Odour Monitoring Zone identified on the policies map;*
- x. A landscape buffer to the western boundary of the site which will provide screening between the development and the Hayden sewage treatment works;*
- xi. A layout and form that respects landscape character, significance and setting of the heritage assets at Hayden Farmhouse and Barn;*
- xii. 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.*

### *Plan A7 – West Cheltenham*

**6.1.17** 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.



# PART 7

## - Delivery, Monitoring & Review

### *Delivery (including Housing Implementation Strategy)*

- 7.1.1** 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, 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.
- 7.1.2** 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.
- 7.1.3** 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.

### *Monitoring*

- 7.1.4** 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.
- 7.1.5** The NPPF sets out that plans should be flexible to adapt to changing circumstances. 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.
- 7.1.6** In order to ensure effective monitoring, a Monitoring Framework has been prepared, setting out key indicators that will track the delivery of the plan.
- 7.1.7** The tables below set out the indicators in relation to each JCS objective. They include any specifically-identified target, the source of the data, and the frequency of monitoring. The range of indicators reflects the JCS's relationship with other plans and programmes and therefore includes relevant national indicators and other local indicators such as those from the Local Transport Plan (LTP).
- 7.1.8** The monitoring outcomes will be reported through a single JCS Authority Monitoring Report (AMR) which will be regularly updated. 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.

**7.1.9** 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 of the following measures to bring forward development:

- Working with developers and infrastructure providers to remove obstacles to the delivery of sites;
- Seeking alternative sources of funding if problems with infrastructure provision is delaying development of key strategic sites;
- The early release of safeguarded land;
- Identifying alternative site(s) in general accordance with the distribution strategy of this plan as set out in Policies SP1 and SP2 which may be delivered through District plans;
- Working with other authorities under the duty to cooperate to address any unmet needs. This will include continued cross-boundary working with Stroud District Council and Wychavon District Council.

#### *Review*

#### *Housing Supply Review Mechanism*

**7.1.10** To reflect the government’s emphasis on flexibility, the methodology for a JCS review in whole or in part is based upon a trigger mechanism. The trigger mechanism solely for monitoring purposes is a 10% buffer applied to the Housing Requirement of each JCS Authority on an annual basis. This mechanism will serve as an early warning to the JCS Authorities when a housing land supply shortfall could be imminent and corrective action is required. Thus the mechanism would be triggered where completions in any year fell below 110% of the Trajectory.

**7.1.11** **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 Housing Implementation Strategy), this will trigger the need for the consideration of a partial or full JCS review.**

**7.1.12** In line with the Gloucestershire devolution bid to the Government, any full or partial review is intended to be aligned with the other Gloucestershire authorities. This is intended to begin within 5 years of adoption of the JCS in line with national guidance.

*“We will work together to achieve ... core strategies and local plans ... and coordination*

*of plan reviews by 2020” (Gloucestershire Devolution Bid - September 2015)*

#### *Retail Review*

**7.1.13** Notwithstanding the above trigger mechanism, a single issue review of the JCS will be undertaken for the Retail and Town Centres policy (SD2) immediately after the adoption of the JCS. This single issue review will take approximately 2 years to complete.

#### *Gloucester Housing Supply Review*

**7.1.14** As presented in the housing trajectories below, Gloucester City has an identified shortfall against the total JCS housing requirement of 1,072 dwellings. Despite this shortfall, Gloucester City can maintain at least a 5.8 years supply of housing land and sufficient sites to deliver housing in the short to medium term. However, it is critical that the shortfall is addressed over the plan period and the JCS authorities are providing an approach to dealing within this in a strategic and plan-led way.

**7.1.15** **To deal with the shortfall the JCS authorities will undertake an immediate review of Gloucester’s housing supply following the adoption of the JCS.**

**7.1.16** It has not been possible to identify sites within the JCS now to meet all of Gloucester’s housing requirements for the entire plan period. However, the JCS authorities are committed to continue to working, through a review of the plan, to identify and allocate sites that will deliver housing growth.

**7.1.17** A review of the plan will explore the further potential for sites to meet Gloucester’s needs in the latter part of the plan period.

**7.1.18** This review will allow consideration of any other development options that become available, both within and outside the JCS area. This could include further development opportunities within the urban area that are not currently deliverable, as well as exploring the potential for urban extensions. The JCS authorities have a Statement of Cooperation in place with Stroud District regarding the need to explore meeting unmet needs arising from the JCS area within Stroud District where it is reasonable to do so and consistent with achieving sustainable development. As such, it is important than any review is undertaken in tandem with the review of the Stroud Local Plan so that all potential development alternatives are comprehensively explored using agreed site assessment criteria through the plan-making process.

## *Tewkesbury Housing Supply Review*

- 7.1.19** As presented in the housing trajectories below, Tewkesbury Borough has an identified shortfall against the total JCS housing requirement of 2,455 dwellings. This shortfall has been significantly exacerbated by a recent decision by the Defence Infrastructure Organisation regarding the now delayed release of the MoD Ashchurch Strategic Allocation which was expected to deliver 2,125 dwellings to 2031. Despite this shortfall, Tewkesbury Borough can maintain at least a 6.3 years supply of housing land and sufficient sites to deliver housing in the short to medium term. However, it is critical that the shortfall is addressed over the plan period and the JCS authorities are providing an approach to dealing with this in a strategic and plan-led way.
- 7.1.20** **To deal with the shortfall the JCS authorities will undertake a review of Tewkesbury's housing supply immediately after the adoption of the JCS.**
- 7.1.21** There remains development potential within the Tewkesbury town and Ashchurch area to meet the housing requirements of the Borough. However, there exists barriers and uncertainty over delivery / availability of sites at the current time which means any alternative Strategic Allocations are not possible within the JCS now. However, the JCS authorities are committed to continue to working, through a review of plan, to identify and allocate sites that will deliver housing and employment growth.
- 7.1.22** The MoD Ashchurch allocation area continues to be an option for sustainable development. The DIO have confirmed the intention to release part of the site for development and there is land that was within the allocation that is not in the DIO / MoD ownership. These land parcels have the potential for release within the plan period and could deliver up to 1,600 dwellings. The challenge for these sites that remain available is around access, masterplanning and infrastructure provision which would need to be overcome before an allocation could be made.
- 7.1.23** A site at Fiddington has been presented as an omission site through the JCS examination and, as concluded in the Inspector's Interim Report (May 2016), it is the only other sustainable strategic site around Tewkesbury town within the JCS area. The site does therefore have potential to meet the development needs of the Borough, however, there are concerns about deliverability at the current time.
- This revolves around the highway infrastructure needs of the area and investigations into a new 'off-line' alternative to the A46 through Ashchurch. Until more is known about the delivery of this infrastructure then allocation of the site at Fiddington in the JCS now is not considered to be appropriate.
- 7.1.24** In addition to this, there is potential within the wider Tewkesbury town and Ashchurch area that present options to meeting housing requirements. This includes sites not discussed through the JCS to date, including those presented through the Tewkesbury Strategic Assessment of Land Availability. However, more site investigation and evidence gathering would need to be undertaken to assess whether they are sustainable options and provide certainty over their deliverability.
- 7.1.25** The Borough Council have submitted a bid for the HCA Capacity Fund in order to support the delivery of growth in this area and unlock housing sites both within and beyond the current plan period. This will include facilitating the earlier release of sites where possible, particularly exploring the potential to bring forward the remaining development parcels on the MoD Strategic Allocation where access and place making are challenges. However it will also involve support for developing a strategy for longer-term growth, looking beyond sites that have been identified through the JCS process and incorporating the impact and opportunities of an off-line A46 route. This will include support for a Development Delivery Plan, including strategic masterplanning, to provide a comprehensive approach which addresses issues such as place making, transport, community building, social infrastructure and green infrastructure. This work will help to inform the review of the JCS and the issue of Tewkesbury's housing supply.
- 7.1.26** Outside of the JCS area a site Mitton, in Wychavon District, has been promoted to the JCS examination as an omission site which could help meet the requirements of Tewkesbury Borough. The JCS authorities are working with Wychavon on the potential and possible release of land at Mitton to deal with 500 homes coming forward to meet Tewkesbury's needs. The JCS authorities will continue to work with Wychavon on the potential delivery of the site in the context of the South Worcestershire Development Plan and the Bredon Neighbourhood Plan.

# Policy REV1: Gloucester and Tewkesbury Housing Supply Review

***A partial review of the housing supply for Gloucester and Tewkesbury will commence immediately upon adoption of the JCS. On adoption, the authorities will publish a Local Development Scheme to set out the timescales for completion. The review will cover the allocation of sites to help meet any shortfall in housing supply against the JCS housing requirements for the respective authorities.***

## *Trajectories*

**7.1.27** 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.

**7.1.28** Then again for each Council is a chart which graphically illustrates the requirement versus completions on a cumulative basis. For each Council, the 5 years supply calculation is provided.

### ***Approach to Previous Delivery Shortfalls Against the Housing Requirement***

**7.1.29** 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.

**7.1.30** The use of the Liverpool approach has been found to be acceptable in a recent Inspector's report on the Basingstoke and Deane Local Plan 2011-2029 dated 6th April 2016. In his report, the Inspector states (at paragraph 94):

*“The Council’s reasons for pursuing the Liverpool approach are linked to its partial reliance on several large sites, which require the provision of significant infrastructure prior to the completion of the first dwellings.*

*These major allocations, which I deal with below in more detail, are sustainably located, near to the main urban areas, especially Basingstoke; they can achieve economies of scale and important community and environmental provision. In my view, these benefits outweigh the delay in their implementation. I therefore support the use of the Liverpool approach for Basingstoke and Deane.”*

**7.1.31** 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 Deane is comparable and relevant to the JCS.

**7.1.32** 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 Deane example, would allow time for these sites to come forward to help meet the previous shortfall and deliver the ongoing annual requirements.

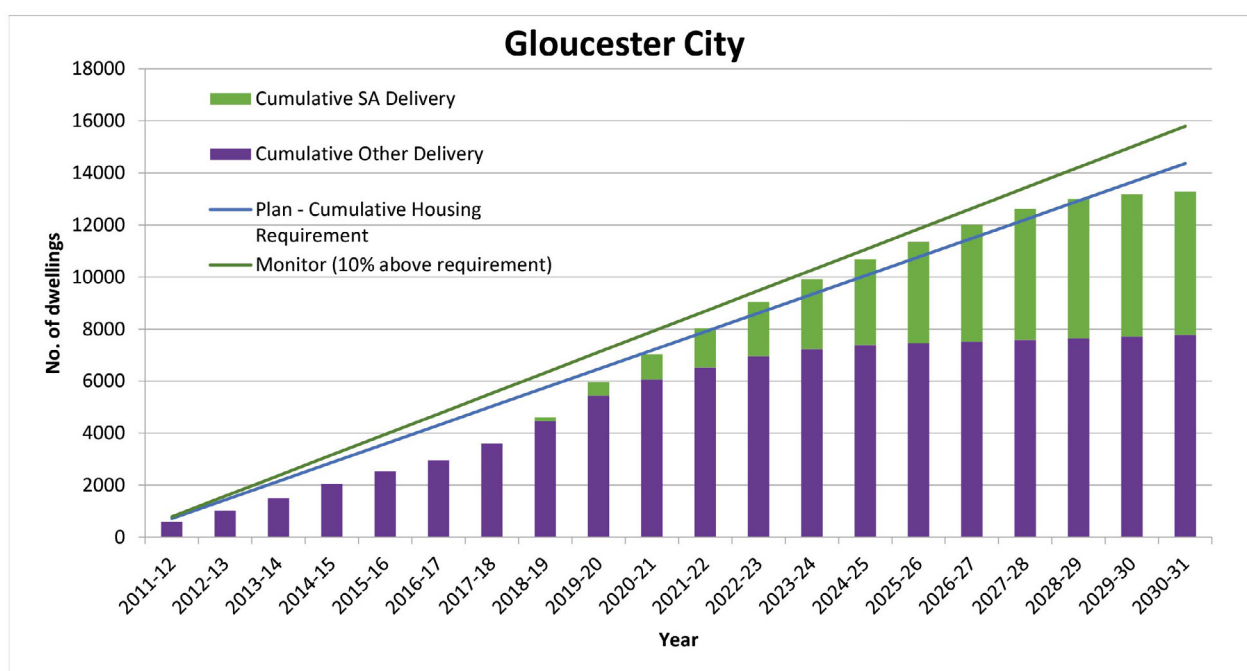
**7.1.33** The JCS authorities have therefore prepared trajectory scenarios that use both the Sedgefield and Liverpool approaches to demonstrate the impact that each would have on the 5 year supply calculations. The Inspector has accepted that the Liverpool approach is justified within the JCS area and supports the use of this approach in her Interim Report (Exam 232, Para 26).

## Gloucester

7.1.34 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 3 years of the plan period shows the shortfall.

However, an early review of Gloucester's housing supply will enable sites to be identified to meet the full requirement in the JCS area and supports the use of this approach in her Interim Report (Exam 232, Para 26).

Gloucester					Liverpool			
Year	Other Delivery	SA Delivery	Total Projected Completions	Cumulative Completions	Plan - Annual Housing Requirement	Plan - Cumulative Housing Requirement	Monitor - No. of dwellings above or below cumulative requirement	Manage - annual requirement taking account of past/projected completions
2011-12	593	0	593	593	718	718	125	718
2012-13	430	0	430	1,023	718	1,436	413	724
2013-14	476	0	476	1,499	718	2,154	655	740
2014-15	554	0	554	2,053	718	2,872	819	754
2015-16	470	0	470	2,523	718	3,590	1,067	766
2016-17	439	0	439	2,962	718	4,308	1,346	785
2017-18	640	0	640	3,602	718	5,026	1,424	808
2018-19	857	150	1,007	4,609	718	5,744	1,135	820
2019-20	977	375	1,352	5,961	718	6,462	501	805
2020-21	622	450	1,072	7,033	718	7,180	147	760
2021-22	464	525	989	8,022	718	7,898	-124	731
2022-23	431	600	1,031	9,053	718	8,616	-437	706
2023-24	273	600	873	9,926	718	9,334	-592	669
2024-25	162	600	762	10,688	718	10,052	-636	644
2025-26	64	600	664	11,352	718	10,770	-582	627
2026-27	64	595	659	12,011	718	11,488	-523	621
2027-28	64	545	609	12,620	718	12,206	-414	613
2028-29	64	325	389	13,009	718	12,924	-85	615
2029-30	64	100	164	13,173	718	13,642	469	690
2030-31	64	50	114	13,287	718	14,360	1,073	953



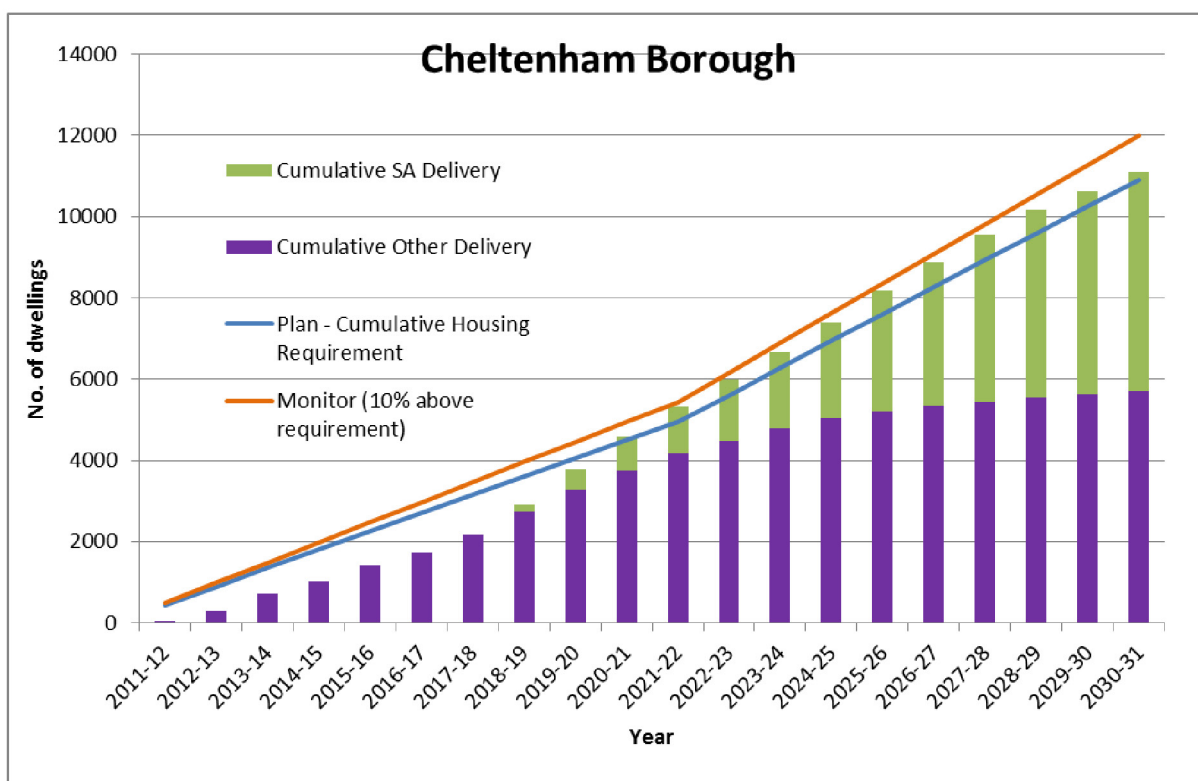
	Pre Adoption Delivery	Explanation	5% Buffer	
A	GCC Annual Housing Requirement		718	718
B	Number of years into the plan period to adoption		7	7
C	Requirement to plan adoption		4308	4308
D	Actual Delivery 2011-2017		2962	2962
E	Total anticipated Delivery to Plan adoption	E = D	2962	2962
F	Anticipated shortfall on adoption	F = C – E	1346	1346
	<b>5YHLS from Adoption</b>		<b>Sedgefield</b>	<b>Liverpool</b>
G	5 Year Requirement	G = A X 5	3590	3590
H	Remainder of plan period		13	13
I	Plan Period Shortfall to be met within the five year period	I, Sedge= F, Liv= (F/H) X 5	1346	518
J	NPPF Buffer	J = 5% of (G+I)	247	205
K	Total no. of dwellings required	K = G + I + J	5183	4313
L	Total anticipated supply		4965	4965
M	Percentage of total requirement met	M = K / L	95.8%	115.1%
N	Supply in Years	N = K / L X 5	4.8	5.8

## Cheltenham

**7.1.35** The chart below for Cheltenham, illustrates a historic undersupply, but an over-supply in the middle and later plan period giving comfortable 5 year supply.

A step trajectory has been employed up to 2021/2022, which improves the 5 year supply.

Cheltenham					Liverpool			
Year	Other Delivery	SA Delivery	Total Projected Completions	Cumulative Completions	Plan - Annual Housing Requirement	Plan - Cumulative Housing Requirement	Monitor - No. of dwellings above or below cumulative requirement	Manage - annual requirement taking account of past/projected completions
2011-12	33	0	33	33	450	450	417	450
2012-13	268	0	268	301	450	900	599	471
2013-14	413	0	413	714	450	1,350	636	482
2014-15	316	0	316	1,030	450	1,800	770	485
2015-16	397	0	397	1,427	450	2,250	823	495
2016-17	297	0	297	1,724	450	2,700	976	501
2017-18	448	0	448	2,172	450	3,150	978	515
2018-19	564	160	724	2,896	450	3,600	704	520
2019-20	528	365	893	3,789	450	4,050	261	504
2020-21	480	310	790	4,579	450	4,500	-79	472
2021-22	418	335	753	5,332	450	4,950	-382	443
2022-23	314	360	674	6,006	663	5,613	-393	412
2023-24	313	360	673	6,679	663	6,276	-403	619
2024-25	243	485	728	7,407	663	6,939	-468	613
2025-26	188	580	768	8,175	663	7,602	-573	596
2026-27	140	580	720	8,895	663	8,265	-630	568
2027-28	83	580	663	9,558	663	8,928	-630	537
2028-29	93	510	603	10,161	663	9,591	-570	506
2029-30	79	380	459	10,620	663	10,254	-366	473
2030-31	92	380	472	11,092	663	10,917	-175	480



	Pre Adoption Delivery	Explanation	20% Buffer	
A	CBC Annual Housing Requirement		450	450
B	Number of years into the plan period to adoption		7	7
C	Requirement to plan adoption		2700	2700
D	Actual Delivery 2011-2017		1724	1724
E	Total anticipated Delivery to Plan adoption	E = D	1724	1724
F	Anticipated shortfall on adoption	F = C – E	976	976
	<b>5YHLS from Adoption</b>		<b>Sedgefield</b>	<b>Liverpool</b>
G	5 Year Requirement	G = A X 5	2250	2250
H	Remainder of plan period		13	13
I	Plan Period Shortfall to be met within the five year period	I, Sedge= F, Liv= (F/H) X 5	975	375
J	NPPF Buffer	J = 20% of (G+I)	645	525
K	Total no. of dwellings required	K = G + I + J	3870	3150
L	Total anticipated supply 2017 to 2022		3539	3539
M	Percentage of total requirement met	M = K / L	91.4%	112.3%
N	Supply in Years	N = K / L X 5	4.6	5.6

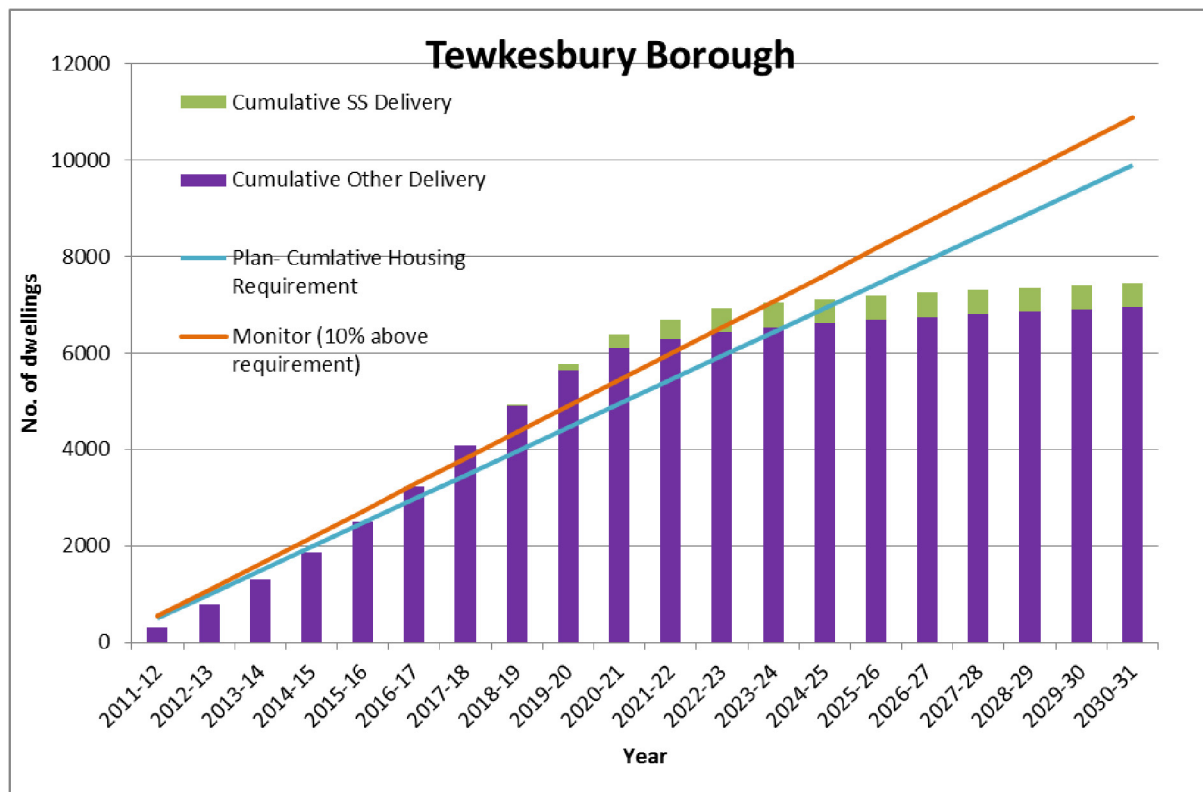


## Tewkesbury

**7.1.36** The charts below for Tewkesbury, demonstrates sufficient housing land supply, including a 5 year supply, until the middle of the plan period at 2024 / 25 where there is a shortfall against

the cumulative housing requirements. This will enable adequate time to undertake an immediate review of Tewkesbury's housing supply while maintaining a 5 year supply.

Tewkesbury							Sedgefield	
Year	Other Delivery	SA Delivery	Total Completions and Projected Completions	Cumulative Completions	Plan - Annual Housing Requirement	Plan - Cumulative Housing Requirement	Monitor - No. of dwellings above or below cumulative requirement	Manage - annual requirement taking account of past/projected completions
2011-12	318	0	318	318	495	495	177	495
2012-13	462	0	462	780	495	990	210	530
2013-14	513	0	513	1,293	495	1,485	192	537
2014-15	572	0	572	1,865	495	1,980	115	533
2015-16	631	0	631	2,496	495	2,475	-21	518
2016-17	728	0	728	3,224	495	2,970	-254	491
2017-18	863	0	863	4,087	495	3,465	-622	444
2018-19	824	25	849	4,936	495	3,960	-976	371
2019-20	715	125	840	5,776	495	4,455	-1,321	300
2020-21	481	125	606	6,382	495	4,950	-1,432	231
2021-22	178	125	303	6,685	495	5,445	-1,240	209
2022-23	147	100	247	6,932	495	5,940	-992	247
2023-24	106	0	106	7,038	495	6,435	-603	297
2024-25	76	0	76	7,114	495	6,930	-184	374
2025-26	76	0	76	7,190	495	7,425	235	458
2026-27	61	0	61	7,251	495	7,920	669	542
2027-28	56	0	56	7,307	495	8,415	1,108	629
2028-29	46	0	46	7,353	495	8,910	1,557	717
2029-30	46	0	46	7,399	495	9,405	2,006	806
2030-31	46	0	46	7,445	495	9,900	2,455	896



	Pre Adoption Delivery	Explanation	20% Buffer
A	TBC Annual Housing Requirement		495
B	Number of years into plan adoption		7
C	Requirement to plan adoption		2970
D	Actual Delivery 2011-2017		3224
E	Total anticipated Delivery to Plan adoption (2011 to 2017)	E = D	3224
F	Anticipated over supply on adoption	F = C – E	-254
	<b>5YHLS from Adoption</b>		<b>Sedgefield</b>
G	5 Year Requirement	G = A X 5	2475
H	Remainder of plan period		13
I	Plan Period over supply to offset over the five year period	I = F	-254
J	NPPF Buffer	J = 20% of (G+I)	444
K	Total no. of dwellings required	K = G + I + J	2665
L	Total anticipated supply 2017 to 2022		3336
M	Percentage of total requirement met	M = K / L	125.2%
N	Supply in Years	N = K / L X 5	6.3

## Strategic Allocations Trajectory (including Mitton in Wychavon)

Site Name	District	Net Site Capacity	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31
Land at West Cheltenham (whole site)	Cheltenham/ Tewkesbury Borough	1100		25	50	50	75	100	100	100	100	100	100	100	100	100
North West Cheltenham (whole site)	Cheltenham/ Tewkesbury Borough	4285		135	315	260	260	260	260	385	480	480	480	410	280	280
Innsworth	Tewkesbury Borough	1300		25	50	50	125	150	150	150	150	150	150	150		
Twigworth	Tewkesbury Borough	995		25	50	50	50	125	150	150	150	150	145			
South Churchdown	Tewkesbury Borough	1100			50	100	100	100	100	100	100	100	100	100	100	50
North Brockworth	Tewkesbury Borough	1500		75	150	150	150	150	150	150	150	150	150	75		
Winnycroft	Gloucester City	620		50	100	100	100	75	50	50	50	45				
Mitton	Wychavon District	500		25	125	125	125	100								
<b>Total Delivery</b>				<b>335</b>	<b>865</b>	<b>885</b>	<b>985</b>	<b>1060</b>	<b>960</b>	<b>1085</b>	<b>1180</b>	<b>1175</b>	<b>1125</b>	<b>835</b>	<b>480</b>	<b>430</b>

### Monitoring Framework

**7.1.37** 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.

Building a strong and competitive urban economy			
Indicator	Target	Source	Period
Net additional jobs created by sector (employment generating uses)	A minimum of 39,500 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)	192ha of employment land delivered 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
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

<b>Ensuring vitality of town centres</b>			
<b>Indicator</b>	<b>Target</b>	<b>Source</b>	<b>Period</b>
Net additional floorspace from retail, leisure, office and other main town centres uses created within defined city/town centres	Linked to strategic centre allocations in the District Plans	Annual Employment Monitoring	Annually
Net additional floorspace from retail, leisure, office and other main town centre uses created outside designated centres/contrary to policy	No target but annually assessed	Annual Employment Monitoring	Annually

<b>Supporting a prosperous rural economy</b>			
<b>Indicator</b>	<b>Target</b>	<b>Source</b>	<b>Period</b>
Number of homes provided with fibre broadband by milestone area against set target.	Target to be agreed, but progress to be monitored on an annual basis	Gloucestershire County Council/'Fastershire'	Annually
Net additional employment floorspace created within the rural areas by use class per annum	No target but annually assessed	Annual Employment Monitoring	Annually
Net retail floorspace in rural areas (Change of Use from A1)	No net loss of floorspace	Annual Employment Monitoring	Annually

<b>Conserving and enhancing the environment</b>			
<b>Indicator</b>	<b>Target</b>	<b>Source</b>	<b>Period</b>
Net changes to Key Wildlife Sites, Special Areas of Conservation, SSSIs, Special Protection Areas, Ramsar sites and other protected areas	No net loss	Gloucestershire Wildlife Trust/Internal Monitoring	Annually
Condition of SSSIs and other areas of landscape and biodiversity importance	To maintain the protection of SSSIs and continually manage and enhance areas of landscape and biodiversity importance	Natural England	Annually
Type of development granted permission in the Green Belt	No inappropriate development in the Green Belt	Internal monitoring	Annually
Listed Buildings, Conservation Areas and Scheduled Monuments on the 'at-risk register'	Align to Local Authority's targets or net reduction on an annual basis	Local authority BAR registers. English Heritage – Heritage at Risk register	Annually
Net changes in the number of Listed Buildings, Registered Parks and Gardens, Conservation Areas, Battlefield and sites of archaeological importance including Scheduled Monuments	No net loss	Internal monitoring	Annually

<b>Delivering excellent design in new developments</b>			
<b>Indicator</b>	<b>Target</b>	<b>Source</b>	<b>Period</b>
Proportion of Strategic Sites with comprehensive masterplans completed and agreed with the local planning authority	All Strategic Sites to have comprehensive masterplans to guide their future development	Internal monitoring	Annually

<b>Meeting the challenges of climate change</b>			
<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	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
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

<b>Promoting Sustainable Transport</b>			
<b>Indicator</b>	<b>Target</b>	<b>Source</b>	<b>Period</b>
Increase use of bus	Increase number of bus passenger journeys	LTP Annual Progress Report	Annually
Increase use of cycling	Increase the number of cycle users at sites across the county	LTP Annual Progress Report	Annually
Increase use of rail	Increase the number of rail ticket sales from railway stations	LTP Annual Progress Report	
Journey time reliability on primary strategic routes	Maintain average journey times at 2015/16 levels	LTP Annual Progress Report	Annually
Number of peak hour vehicle journeys	Restrict growth in the number of peak hour vehicle journeys on local access routes	LTP Annual Progress Report	Annually

<b>Delivering a wide choice of quality homes</b>			
<b>Indicator</b>	<b>Target</b>	<b>Source</b>	<b>Period</b>
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
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
Cumulative housing completions on JCS Strategic Allocations.	Minimum 75% of the annual cumulative requirement of the three districts.	Internal monitoring	Annually

<b>Promoting healthy communities</b>			
<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.	LTP Annual Progress Report	Annually
Maintain bus passenger access to facilities	Maintain level of access to GP services and facilities by public transport within 45 mins	LTP Annual Progress Report	Annually
Number of essential community facilities lost or gained through the development process	No loss of community facilities	Internal monitoring	Annually



# Appendix 1

## - Superseded Policies

### *Cheltenham Borough Local Plan 2006*

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.

POLICY REF	POLICY HEADING	SUPERSEDED BY JCS? YES / NO	SUPERSEDING JCS POLICY / POLICIES
CP 1	<i>Sustainable Development</i>	YES	SD10, SD14
CP 2	<i>Sequential Approach to Location of Development</i>	NO	
CP 3	<i>Sustainable Environment</i>	NO	
CP 4	<i>Safe and Sustainable Living</i>	NO	
CP 5	<i>Sustainable Transport</i>	YES	SD4, INF1
CP 6	<i>Mixed Use Development</i>	NO	
CP 7	<i>Design</i>	NO	
CP 8	<i>Provision of Necessary Infrastructure and Facilities</i>	YES	INF4, INF6, INF7
PR 1	<i>Land Allocated for Housing Development</i>	NO	
PR 2	<i>Land Allocated for Mixed Use Development</i>	NO	
PR 3	<i>Land Safeguarded for Transport Schemes</i>	DELETED	
BE 1	<i>Open Space in Conservation Areas</i>	NO	
BE 2	<i>Residential Character in Conservation Areas</i>	NO	
BE 3	<i>Demolition in Conservation Areas</i>	DELETED	
BE 4	<i>Timing Of Demolition in Conservation Areas</i>	NO	
BE 5	<i>Boundary Enclosures in Conservation Areas</i>	NO	
BE 6	<i>Back Lanes in Conservation Areas</i>	NO	
BE 7	<i>Parking on Forecourts or Front Gardens in Conservation Areas</i>	NO	
BE 8	<i>Demolition of Listed Buildings</i>	DELETED	



POLICY REF	POLICY HEADING	SUPERSEDED BY JCS? YES / NO	SUPERSEDING JCS POLICY / POLICIES
BE 9	<i>Alteration of Listed Buildings</i>	DELETED	
BE 10	<i>Boundary Enclosures to Listed Buildings</i>	NO	
BE 11	<i>Buildings of Local Importance</i>	NO	
BE 12	<i>Advertisements and Signs</i>	DELETED	
BE 13	<i>Advertisements and Signs in Conservation Areas</i>	NO	
BE 14	<i>Advertisement Hoardings in Conservation Areas</i>	NO	
BE 15	<i>Projecting Signs in Conservation Areas</i>	NO	
BE 16	<i>Petrol Filling Stations and Car Sales in Conservation Areas</i>	NO	
BE 17	<i>Advertisements And Signs On Listed Buildings</i>	NO	
BE 18	<i>Design and Landscaping of New Roads</i>	YES	SD4
BE 19	<i>Nationally Important Archaeological Remains</i>	NO	
BE 20	<i>Archaeological Remains of Local Importance</i>	NO	
GE 1	<i>Public Green Space</i>	NO	
GE 2	<i>Private Green Space</i>	NO	
GE 3	<i>Development Within Extensive Grounds</i>	YES	SD4, SD9, INF3
GE 4	<i>Pittville Park and Bouncers Lane Cemetery</i>	NO	
GE 5	<i>Protection and Replacement of Trees</i>	NO	
GE 6	<i>Trees And Development</i>	NO	
GE 7	<i>Accommodation and Protection of Natural Features</i>	NO	

POLICY REF	POLICY HEADING	SUPERSEDED BY JCS? YES / NO	SUPERSEDING JCS POLICY / POLICIES
CO 1	<i>Landscape Character</i>	YES	SD4, SD6, SD7
CO 2	<i>Development within or affecting the AONB</i>	YES	SD7
CO 3	<i>Rebuilding or Replacement of Buildings in the AONB</i>	YES	SD7
CO 4	<i>Extension of Buildings in the AONB</i>	NO	
CO 5	<i>Definition of Green Belt</i>	YES	SD5
CO 6	<i>Development in the Green Belt</i>	YES	SD5, SD10
CO 7	<i>Rebuilding or Replacement of Dwellings in the Green Belt</i>	NO	
CO 8	<i>Extension of Dwellings in the Green Belt</i>	DELETED	
CO 9	<i>Development at Cheltenham Racecourse</i>	YES	SD5
CO 10	<i>Agricultural Land</i>	YES	SD14
CO 11	<i>Agricultural and Forestry Dwellings</i>	NO	
CO 12	<i>Farm Diversification Projects</i>	YES	SD1, SD4, SD6
CO 13	<i>Conversion of Rural Buildings</i>	NO	
CO 14	<i>Development Abutting the Countryside</i>	YES	SD4, SD6
NE 1	<i>Habitats of Legally Protected Species</i>	YES	SD9
NE 2	<i>Designated Nature Conservation Sites</i>	YES	SD9
NE 3	<i>Biodiversity and Geodiversity of Local Importance</i>	YES	SD9
NE 4	<i>Contaminated Land</i>	YES	SD14
EM 1	<i>Employment Uses</i>	YES	SD1

POLICY REF	POLICY HEADING	SUPERSEDED BY JCS? YES / NO	SUPERSEDING JCS POLICY / POLICIES
EM 2	<i>Safeguarding of Employment Land</i>	NO	
HS 1	<i>Housing Development</i>	YES	SD10
HS 2	<i>Housing Density</i>	YES	SD10
HS 3	<i>Sub-Division of Existing Dwellings</i>	YES	SD4
HS 4	<i>Affordable Housing</i>	YES	SD12
HS 5	<i>Mixed Communities</i>	YES	SD11
HS 6	<i>Elderly Persons Housing</i>	YES	SD11
HS 7	<i>Loss of Residential Accommodation</i>	DELETED	
HS 8	<i>Houses in Multiple Occupation</i>	NO	
RT 1	<i>Location of Retail Development</i>	NO	
RT 2	<i>Retail Development in the Core Commercial Area</i>	NO	
RT 3	<i>Non-A1 Uses in Primary Shopping Frontages</i>	NO	
RT 4	<i>Retail Development in Local Shopping Centres</i>	NO	
RT 5	<i>Non-A1 Uses In Local Shopping Centres</i>	NO	
RT 6	<i>New Local Shopping Centres</i>	DELETED	
RT 7	<i>Retail Development in Out of Centre Locations</i>	DELETED	
RT 8	<i>Individual Convenience Shops</i>	NO	
RT 9	<i>Car Sales</i>	NO	
RT 10	<i>Access to Upper Floors of Commercial Premises</i>	NO	

POLICY REF	POLICY HEADING	SUPERSEDED BY JCS? YES / NO	SUPERSEDING JCS POLICY / POLICIES
RC 1	<i>Existing Community Facilities</i>	YES	INF4
RC 2	<i>Youth and Adult Outdoor Playing Facilities</i>	NO	
RC 3	<i>Outdoor Playing Facilities in Educational Use</i>	YES	INF4
RC 4	<i>Casual Play Space</i>	NO	
RC 5	<i>Development of Amenity Space</i>	NO	
RC 6	<i>Play Space in Residential Development</i>	NO	
RC 7	<i>Amenity Space in Housing Developments</i>	NO	
RC 8	<i>New Public Green Space</i>	NO	
RC 9	<i>Honeybourne Line Footpath / Cycleway</i>	NO	
RC 10	<i>Allotments</i>	NO	
RC 11	<i>Recreation and Sport in the Countryside</i>	YES	SD5, SD6, SD7
RC 12	<i>Golf Courses</i>	YES	SD5, SD6, SD7
RC 13	<i>Public Rights of Way in the Countryside</i>	YES	INF3
UI 1	<i>Development in Flood Zones</i>	YES	INF2
UI 2	<i>Development and Flooding</i>	YES	INF2
UI 3	<i>Sustainable Drainage Systems</i>	YES	INF2
UI 4	<i>Maintenance Strips for Watercourses</i>	NO	
UI 5	<i>Culverting of Watercourses</i>	YES	INF2
UI 6	<i>Development Near Sewage Treatment Works</i>	YES	SD5, SD14
UI 7	<i>Renewable Energy</i>	YES	SD3, SD4, SD14, INF5

POLICY REF	POLICY HEADING	SUPERSEDED BY JCS? YES / NO	SUPERSEDING JCS POLICY / POLICIES
UI 8	<i>Telecommunications Installations</i>	YES	<i>INF6, SD14</i>
TP 1	<i>Development and Highway Safety</i>	YES	<i>SD4, INF1</i>
TP 2	<i>Highway Standards</i>	YES	<i>SD4, INF1</i>
TP 3	<i>Servicing of Shopping Facilities</i>	DELETED	
TP 4	<i>Long-Stay Car Parking</i>	NO	
TP 5	<i>Extension of Private Car Parking Facilities</i>	DELETED	
TP 6	<i>Parking Provision In Development</i>	DELETED	

*Tewkesbury Borough Local Plan 2006*

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).

POLICY REF	TITLE	SUPERSEDED BY JCS? YES / NO	SUPERSEDING JCS POLICY / POLICIES
GNL2	<i>DESIGN REQUIREMENTS FOR MAJOR DEVELOPMENT PROPOSALS</i>	YES	SD4
GNL6	<i>PROVISION FOR ART</i>	NO	
GNL8	<i>ENERGY EFFICIENT DEVELOPMENT</i>	YES	SD3
GNL11	<i>IMPLEMENTATION</i>	YES	INF6, INF2
GNL13	<i>ADVERTISEMENTS</i>	NO	
GNL15	<i>NEW COMMUNITY FACILITIES</i>	YES	INF4
GNL17	<i>PRE-SCHOOL CHILDCARE FACILITIES</i>	NO	
HOU1	<i>HOUSING ALLOCATIONS</i>	NO	
HOU2	<i>LARGER SETTLEMENTS CONTAINING A PRIMARY LEVEL OF COMMUNITY FACILITIES AND SERVICES</i>	YES	SP2, SD10
HOU3	<i>OTHER VILLAGES (INFILLING ONLY)</i>	YES	SP2, SD10
HOU4	<i>OTHER SETTLEMENTS / RURAL AREAS</i>	YES	SP2, SD10
HOU5	<i>NEW HOUSING DEVELOPMENT WITHIN EXISTING RESIDENTIAL AREAS</i>	YES	SP2, SD4, SD10, SD11
HOU6	<i>REFURBISHMENT OF EXISTING DWELLINGS</i>	NO	
HOU7	<i>REPLACEMENT DWELLINGS</i>	NO	
HOU8	<i>DOMESTIC EXTENSIONS</i>	NO	
HOU9	<i>CONVERSIONS / SUB-DIVISION</i>	NO	
HOU10	<i>CHANGE OF USE OF AGRICULTURAL LAND TO RESIDENTIAL CURTILAGE</i>	NO	

POLICY REF	TITLE	SUPERSEDED BY JCS? YES / NO	SUPERSEDING JCS POLICY / POLICIES
HOU11	<i>ELDERLY PERSONS' ACCOMMODATION (INDEPENDENT UNITS) / SPECIAL NEEDS HOUSING</i>	YES	SD11
HOU12	<i>MOBILE HOMES</i>	NO	
HOU13	<i>AFFORDABLE HOUSING</i>	YES	SD12
HOU14	<i>AFFORDABLE HOUSING (EXCEPTIONS SCHEMES)</i>	YES	SD12
HOU16	<i>MINSTERWORTH TRAVELLERS' SITES</i>	NO	
GRB1	<i>GREEN BELT</i>	YES	SD5
EMP1	<i>MAJOR EMPLOYMENT SITES</i>	NO	
EMP2	<i>EMPLOYMENT USES WITHIN SETTLEMENTS OUTSIDE ALLOCATED SITES</i>	NO	
EMP3	<i>RURAL BUSINESS CENTRES</i>	NO	
EMP4	<i>RURAL EMPLOYMENT POLICY</i>	YES	SD1
EMP5	<i>EXISTING EMPLOYMENT USES OUTSIDE SETTLEMENTS, ALLOCATED SITES AND RURAL BUSINESS CENTRES</i>	YES	SD1
TPT1	<i>ACCESS FOR DEVELOPMENT</i>	YES	INF1
TPT3	<i>PEDESTRIAN NETWORKS</i>	NO	
TPT5	<i>CYCLE NETWORK ENHANCEMENT</i>	NO	
TPT6	<i>CYCLE PARKING</i>	NO	
TPT8	<i>PARK AND RIDE PROVISION</i>	NO	
TPT9	<i>PUBLIC TRANSPORT CORRIDORS</i>	NO	
TPT10	<i>RAILWAY STATIONS</i>	NO	
TPT11	<i>SUPPORT FOR RESTORATION OF GLOUCESTERSHIRE WARWICKSHIRE RAILWAY</i>	NO	

POLICY REF	TITLE	SUPERSEDED BY JCS? YES / NO	SUPERSEDING JCS POLICY / POLICIES
TPT13	<i>M5 JUNCTION 9 TO A46 ASTON CROSS</i>	NO	
TPT14	<i>TEWKESBURY NORTHERN BYPASS CORRIDOR PROTECTION</i>	NO	
TPT16	<i>NEW PETROL FILLING STATIONS</i>	NO	
TPT18	<i>PROTECTION OF POTENTIAL FREIGHT RAILHEADS</i>	YES	SA1
HEN2	<i>CONSERVATION AREA: SETTING AND IMPACT</i>	NO	
HEN6	<i>SHOPFRONTS IN CONSERVATION AREAS</i>	NO	
HEN7	<i>BLINDS AND CANOPIES IN CONSERVATION AREAS</i>	NO	
HEN17	<i>ADVERTISEMENTS ON LISTED BUILDINGS</i>	NO	
HEN24	<i>HISTORIC BATTLEFIELDS</i>	NO	
EVT1	<i>ENERGY</i>	YES	INF5
EVT2	<i>LIGHT POLLUTION</i>	YES	SD14
EVT3	<i>NOISE POLLUTION</i>	YES	SD14
EVT5	<i>DEVELOPMENT IN HIGH, AND LOW TO MEDIUM FLOOD RISK AREAS</i>	YES	INF2
EVT8	<i>DEVELOPMENT NEAR SEWAGE TREATMENT WORKS</i>	NO	
EVT9	<i>SUSTAINABLE URBAN DRAINAGE SYSTEMS</i>	YES	INF2
LND2	<i>SPECIAL LANDSCAPE AREA (SLA)</i>	NO	
LND3	<i>LANDSCAPE PROTECTION ZONE (LPZ)</i>	NO	
LND4	<i>LANDSCAPE - COUNTRYSIDE PROTECTION</i>	YES	SD6
LND5	<i>IMPORTANT OPEN SPACES</i>	NO	



POLICY REF	TITLE	SUPERSEDED BY JCS? YES / NO	SUPERSEDING JCS POLICY / POLICIES
LND6	<i>HISTORIC PARKS AND GARDENS</i>	NO	
LND7	<i>LANDSCAPING OF NEW DEVELOPMENTS</i>	YES	INF3, SD6, SD4
TOR1	<i>GENERAL POLICY</i>	NO	
TOR2	<i>SERVICED / SELF CATERING ACCOMMODATION</i>	NO	
TOR4	<i>NEW STATIC CARAVAN / LOG CABIN / CHALET SITES</i>	NO	
TOR5	<i>TOURING CARAVAN AND CAMPING SITES</i>	NO	
TOR6	<i>EXTENSIONS TO EXISTING CARAVAN / CAMP SITES</i>	NO	
TOR7	<i>FARM DIVERSIFICATION</i>	YES	SD1
TOR9	<i>HEREFORDSHIRE AND GLOUCESTERSHIRE CANAL</i>	NO	
RET1	<i>TEWKESBURY TOWN CENTRE PRIMARY SHOPPING FRONTAGES</i>	NO	
RET2	<i>TEWKESBURY TOWN CENTRE MIXED USE FRONTAGES</i>	NO	
RET3	<i>RETAIL AREAS</i>	NO	
RET4	<i>NEW LOCAL FACILITIES</i>	NO	
RET5	<i>VILLAGE SHOPS AND PUBLIC HOUSES</i>	NO	
RET6	<i>NEW RETAIL PROPOSALS</i>	YES	SD2
RET8	<i>GARDEN CENTRES</i>	NO	
RET9	<i>FARMSHOPS / PICK-YOUR-OWN</i>	YES	SD1
RCN1	<i>OUTDOOR PLAYING SPACE</i>	NO	
RCN2	<i>PROVISION OF SPORTS FACILITIES</i>	NO	

POLICY REF	TITLE	SUPERSEDED BY JCS? YES / NO	SUPERSEDING JCS POLICY / POLICIES
RCN3	<i>NEW ARTS, ENTERTAINMENT AND LEISURE FACILITIES</i>	YES	INF4, SD2
RCN4	<i>RECREATION IN AONB / SLA / LPZ</i>	NO	
RCN6	<i>HORSE RIDING FACILITIES</i>	NO	
RCN7	<i>GOLF COURSES AND DRIVING RANGES</i>	NO	
RCN8	<i>RECREATIONAL AND COMMERCIAL USE OF PONDS AND LAKES</i>	NO	
RCN9	<i>NOISE NUISANCE CAUSED BY SPORTS IN THE COUNTRYSIDE</i>	YES	SD14
RCN10	<i>ALLOTMENTS</i>	NO	
NCN3	<i>PROTECTION OF OTHER SITES OF NATURE CONSERVATION OR GEOLOGICAL / GEOMORPHOLOGICAL INTEREST</i>	NO	
NCN5	<i>PROTECTION OF IMPORTANT NATURAL FEATURES / BIODIVERSITY</i>	YES	SD9
NCN6	<i>NEW AND RESTORED PONDS</i>	NO	
AGR2	<i>AGRICULTURAL DWELLINGS</i>	NO	
AGR3	<i>REMOVAL OF AGRICULTURAL WORKERS' OCCUPANCY CONDITIONS</i>	NO	
AGR4	<i>AGRICULTURAL DIVERSIFICATION</i>	YES	SD1
AGR5	<i>NEW AGRICULTURAL BUILDINGS</i>	NO	
AGR6	<i>RE-USE AND ADAPTATION OF RURAL BUILDINGS – GENERAL</i>	NO	
AGR7	<i>RE-USE AND ADAPTATION OF RURAL BUILDINGS – RETENTION OF CHARACTER</i>	NO	

## LOCAL POLICIES

AC1	<i>LAND ADJACENT TO RAILWAY AT NORTHWAY LANE, NORTHWAY</i>	NO	
AC3	<i>COWFIELD FARM SOUTH</i>	NO	
BI1	<i>GILDERS CORNER</i>	NO	
BI2	<i>NORTH OF DEAN FARM, BISHOPS CLEEVE</i>	NO	
BI3	<i>MALVERN VIEW, BISHOPS CLEEVE</i>	NO	
BI4	<i>CLEEVE BUSINESS PARK, BISHOPS CLEEVE</i>	NO	
BR1	<i>BROCKWORTH AND HUCCLECOTE HOUSING SITES</i>	NO	
BR2	<i>GLOUCESTER BUSINESS PARK</i>	NO	
BR3	<i>BROCKWORTH / HUCCLECOTE DISTRICT CENTRE</i>	NO	
BR5	<i>MILL LANE, BROCKWORTH</i>	NO	
BR6	<i>KENNEL LANE, BROCKWORTH</i>	NO	
CH1	<i>SOUTH EAST CAMP</i>	YES	SD5
CH2	<i>GLOUCESTERSHIRE AIRPORT</i>	YES	SD5
CH3	<i>ST JOHN'S AVENUE / PARTON ROAD</i>	NO	
HU1	<i>HUCCLECOTE ROAD, HUCCLECOTE</i>	NO	
SD1	<i>HILLVIEW NURSERIES, SHURDINGTON</i>	NO	
SD2	<i>FARM LANE / LECKHAMPTON LANE, SHURDINGTON</i>	YES	SP2, SA1
SO1	<i>NOVERTON LANE / MILL LANE, SOUTHAM</i>	NO	
TY1	<i>ACCESS TO THE RIVER NETWORK</i>	NO	
TY2	<i>LAND EAST OF PRIORS PARK</i>	NO	

LOCAL POLICIES			
TY3	<i>BISHOPS WALK / SPRING GARDENS</i>	NO	
TY4	<i>OLDBURY EMPLOYMENT SITE</i>	NO	
TY5	<i>BREDON ROAD, TEWKESBURY</i>	NO	
TY6	<i>TEWKESBURY – BACK OF MAIN STREETS</i>	NO	
TY7	<i>OLD RAILWAY LINE, TEWKESBURY</i>	NO	
UC1	<i>BARBRIDGE NURSERIES, UCKINGTON</i>	NO	

### **Gloucester Local Plan 1983**

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
<i>Introduction</i>	NO	
<i>Objectives</i>	NO	
<i>Finance</i>	NO	
<i>Employment policies</i>	NO	
<i>E.1 Release of industrial land sufficient for 5 years requirement</i>	NO	
<i>E.2 Release of office development sufficient to cater for 5 years requirement</i>	NO	
<i>H.1 Release of land for residential development to cater for 5 years requirement</i>	NO	
<i>H.1c Provision of additional housing sites to those identified in H1a will be encouraged in the city centre</i>	NO	
<i>H.1e Density and quality of housing development</i>	NO	

Local Plan policy	Superseded by JCS ? Yes / No / Partial	Superseding JCS policy
<i>H.3 Preservation and revitalisation of older housing stock</i>	NO	
<i>H.4 Housing provision for those whose needs are not met by the private sector</i>	YES	SD11
<i>H.4b Provision of grants for adaptation of homes for the registered disabled</i>	NO	
<i>A.1a Heights of buildings and protection of views</i>	NO	
<i>A.2 Particular regard will be given to the city's heritage in terms of archaeological remains, listed buildings and conservation areas</i>	NO	
<i>A.2d Demolition of listed buildings in conservation areas</i>	NO	
<i>A.3a Investigation and resolution of environmental problems caused by traffic on Bristol Road and Barton Street</i>	NO	
<i>A.4e Development on or around Robinswood Hill will not be permitted except where there are exceptional circumstances</i>	NO	
<i>A.5a The inclusion of tourist related uses within the comprehensive redevelopment of the Docks area will be encouraged</i>	NO	
<i>A.5c Conservation and maintenance of structures and settings of City's historic fabric (various sites)</i>	NO	
<i>A.5d Redevelopment of Blackfriars as a tourist attraction</i>	NO	
<i>A.6a Provision of coach parking facilities at Westgate Street and the Docks</i>	NO	
<i>A.7 Encourage provision of an adequate level and mix of accommodation to satisfy visitor demand</i>	NO	
<i>A.7a Provision of appropriate self-catering accommodation, Conference Centre and central area hotels</i>	NO	
<i>A.7b Encourage Guest House developments along main radial routes and the city centre</i>	NO	

Local Plan policy	Superseded by JCS ? Yes / No / Partial	Superseding JCS policy
<i>T.1e Pedestrian priority within traffic management schemes in the main shopping area of the city</i>	NO	
<i>T.1f Pedestrian priority in the city centre outside the main shopping area</i>	NO	
<i>T.2d Measures to facilitate rear access servicing</i>	NO	
<i>T.3 Introduction of traffic regulation and control measures along Bristol Road and Southgate Street</i>	NO	
<i>T.3a Access to existing and future industrial premises will be assisted, where necessary, by traffic management and other measures</i>	NO	
<i>T.3b Consideration will be given to traffic management along Bristol Road</i>	NO	
<i>T.4a Differential charging of short and long stay car parks to discourage inappropriate use</i>	NO	
<i>T.4k Provision of car parking at private development in accordance with the Councils car parking standards</i>	NO	INF1, INF6
<i>T.5b Early introduction of new bus services with new residential development</i>	YES	INF1, INF3, INF6
<i>T.6 Measures will be introduced to encourage cycling</i>	YES	INF1, INF3, INF6
<i>T.6c Encourage cyclist-only routes</i>	YES	SD2
<i>S.1 Maintain and strengthen Gloucester's role as a sub-regional shopping centre and concentrate comparison shopping in the city except in exceptional circumstances</i>	YES	SD2
<i>S.1a Major comparison shopping will not usually be permitted outside the main shopping area</i>	YES	
<i>S.1e Conversion of shops to other uses at ground floor level will not normally be allowed in the main shopping area</i>	NO	

Local Plan policy	Superseded by JCS ? Yes / No / Partial	Superseding JCS policy
<i>S.2b Major convenience shopping will not usually be permitted outside the main shopping area</i>	NO	
<i>S.3 Continued provision of shopping facilities to meet local needs outside the City Centre will be encouraged</i>	NO	
<i>S.3a Neighbourhood shopping facilities will be encouraged and sometimes required in developing residential areas</i>	NO	
<i>S.3b The City Council will seek to maintain the existing neighbourhood shopping provision in the City</i>	NO	
<i>L.1 Retain public open space, provision with new development, and attempt provision where a shortfall has been identified</i>	NO	
<i>L.1a Retain existing areas of public open space</i>	NO	
<i>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</i>	NO	
<i>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</i>	NO	
<i>L.2b Seek to provide additional sports facilities on public open space in new developments</i>	YES	INF6
<i>L.3c Inclusion of leisure facilities within the Docks redevelopment and financial contribution towards the cost of transferring the British Waterways Museum to Gloucester</i>	NO	
<i>L.3d Maintenance and protection of Robinswood Hill Country Park</i>	NO	

