

**Gloucester, Cheltenham and Tewkesbury
Joint Core Strategy
2011 - 2031**

**Adoption Version
November 2017**

SD5 – GREEN BELT

Background

- 4.6.1 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.
- 4.6.2 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.
- 4.6.3 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.
- 4.6.4 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.
- 4.6.5 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.
- 4.6.6 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).
- 4.6.7 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.

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

- 4.6.8 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.
- 4.6.9 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.
- 4.6.10 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.

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 plans.***
- 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

- 4.11.3 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.
- 4.11.4 In accordance with Policy SP2, new housing will be delivered within the two main urban centres of Cheltenham and Gloucester and through urban extensions to those centres to meet needs where they arise. Development is directed to Tewkesbury town in accordance with its role as a market town and to rural service centres and service villages. This will include sites allocated in district or neighbourhood plans and additional windfall sites. Windfall development on previously-developed land within cities, towns, rural service

centres and service villages is supported in principle, subject to the other policies in this strategy and the relevant district and neighbourhood plans. In addition to this, proposals that will bring empty space back into use are encouraged.

- 4.11.5 Outside cities, towns, rural service centres and service villages, there are generally insufficient facilities to support development and so they are not considered sustainable locations for residential development. Hence, new residential development is not considered appropriate unless specific exceptions are made within JCS, district or neighbourhood plan policies. For the purpose of this policy (4 ii), infill development means the development of an under-developed plot well related to existing built development. Additional special circumstances where housing development may be acceptable are listed in NPPF Paragraph 55.
- 4.11.6 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

- 4.11.7 Delivery will be by developers, registered providers and specialist housing providers, working in partnership with local authorities.
- 4.11.8 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.
- 4.11.9 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.
- 4.11.10 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.
- 4.11.11 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

- 4.12.1 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.
- 4.12.2 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

4.12.3 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.

- 4.12.4 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.
- 4.12.5 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.
- 4.12.6 New housing should be designed in a way that enables households, including older people and those with disabilities, to live comfortably. This will include having adequate space to allow home working or study, space for visitors in housing for older people, and space to allow ease of movement in specialist accommodation. Within the JCS area this will be achieved by meeting or 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.
- 4.12.7 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.
- 4.12.8 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.
- 4.12.9 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

- 4.12.10 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.

- 4.12.11 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.
- 4.12.12 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.
- 4.12.13 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.
- 4.12.14 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.

SD13 – GYPSIES, TRAVELLERS & TRAVELLING SHOWPEOPLE

Background

- 4.14.1 '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 (GTTSA) 2013. This update provides a robust and credible evidence base to inform plan making.
- 4.14.2 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													
	TB C	GC C	CB C	Sub - Tot al	TBC	GCC	CBC	Sub- Tota l	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
Sub-Total	43	1	2	46	16	0	0	16	19	1	1	21	83
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
Sub-Total	18	8	0	26	3	4	0	7	3	4	0	7	40

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 Co-operate' to provide for traveller needs, in order to provide more flexibility in the identification of sites, including the preparation of joint development plans. Further to this, the assessment confirms issues with the ability to bring forward sites for traveller communities in urban areas for reasons such as limited land availability and site viability. Depending on the availability of deliverable sites, it may also be necessary to work with other Gloucestershire authorities to address needs arising from their communities.

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.