



CHEL TENHAM

BOROUGH COUNCIL

Notice of a meeting of Council

Thursday, 10 November 2011

2.30 pm

Council Chamber, Municipal Offices

Membership	
Councillors:	Anne Regan, Barbara Driver (Chair), Garth Barnes, Ian Bickerton, Nigel Britter, Chris Coleman, Tim Cooper, Bernard Fisher, Jacky Fletcher, Wendy Flynn, Rob Garnham, Les Godwin, Penny Hall, Colin Hay (Vice-Chair), Rowena Hay, Diane Hibbert, Sandra Holliday, Peter Jeffries, Steve Jordan, Robin MacDonald, Paul Massey, Helena McCloskey, Andrew McKinlay, Heather McLain, Paul McLain, John Rawson, Diggory Seacome, Duncan Smith, Malcolm Stennett, Charles Stewart, Klara Sudbury, Lloyd Surgenor, Jo Teakle, Pat Thornton, Jon Walklett, Andrew Wall, John Webster, Paul Wheeldon, Simon Wheeler and Roger Whyborn

The Council has a substitution process and any substitutions will be announced at the meeting

Agenda

1.	PRAYERS	
2.	APOLOGIES	
3.	DECLARATIONS OF INTEREST	
4.	TO APPROVE AND CONFIRM THE MINUTES OF THE MEETING HELD ON THE 10 OCTOBER 2011	(Pages 1 - 18)
5.	PUBLIC QUESTIONS These must be received no later than 10am on the fifth working day before the date of the meeting	
6.	COMMUNICATIONS BY THE MAYOR	
7.	COMMUNICATIONS BY THE LEADER OF THE COUNCIL	
8.	MEMBER QUESTIONS	
9.	JOINT CORE STRATEGY: DEVELOPING THE PREFERRED OPTION Report of the Leader	(Pages 19 - 580)

10.		<p>NOTICES OF MOTION Proposed by: Councillor Rawson Seconded by: Councillor Massey</p> <p>This Council, bearing in mind the impact on the local community of the proposed replacement of the overbridge at junction 10 of the M5 (Piffs Elm), including:</p> <ul style="list-style-type: none"> a) potential traffic disruption and congestion resulting in longer journey times; b) extra costs to Cheltenham residents, such as higher fuel costs and potentially higher bus fares; and c) extra operating costs for local businesses at a time when the economy is already weak; <p>resolves as follows:</p> <ol style="list-style-type: none"> 1. To urge the Highways Agency to look at every possible way of keeping the duration of the work to a minimum, and certainly to a significantly shorter timeframe than the period of up of a year that has been quoted; 2. To urge the Highways Agency and the Department of Transport to work with Gloucestershire Highways, the County Council, Tewkesbury Borough Council and Cheltenham Borough Council to resolve the traffic problems arising from the lengthy closure of the motorway bridge and part of Tewkesbury Road, bearing in mind this may require measures such as weight restrictions, road resurfacing and junction improvements to cope with displaced traffic on minor routes; and to urge the Department of Transport to provide additional funding to Gloucestershire Highways to carry out these works; 3. To urge the Highways Agency and the Department of Transport to reconsider offering financial compensation to businesses worst affected by the bridge and road closure, bearing in mind the relatively long duration of the works and the impact they will have; 4. To urge the Highways Agency and the Department of Transport to reconsider combining the bridge replace with works to create a full motorway interchange at Piffs Elm; or, failing this, to ensure that the specification of the new bridge is such that it could be part of a full interchange at a later date; and 	
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		5. To seek the support of Cheltenham's local MPs for these measures.	
11.		TO RECEIVE PETITIONS	
12.		ANY OTHER ITEM THE MAYOR DETERMINES AS URGENT AND WHICH REQUIRES A DECISION	
13.		<p>LOCAL GOVERNMENT ACT 1972 -EXEMPT INFORMATION The Council is recommended to approve the following resolution:-</p> <p>“That in accordance with Section 100A(4) Local Government Act 1972 the public be excluded from the meeting for the remaining agenda items as it is likely that, in view of the nature of the business to be transacted or the nature of the proceedings, if members of the public are present there will be disclosed to them exempt information as defined in paragraphs 1,3 and 5 Schedule (12A) Local Government Act 1972, namely:</p> <p>Paragraph 1; Information relating to any individual.</p> <p>Paragraph 3; Information relating to the financial or business affairs of any particular person (including the authority holding that information)</p> <p>Paragraph 5; Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings</p>	
14.		<p>EXEMPT MINUTES To approve the exempt minutes of the meeting held on the 10 October 2011</p>	(Pages 581 - 588)
15.		<p>REQUEST FOR DISCRETIONARY ALLOWANCE UNDER THE LOCAL GOVERNMENT (DISCRETIONARY PAYMENTS) REGULATIONS 1996 To follow</p>	

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Council

**Monday, 10th October, 2011
2.30 - 7.10 pm**

Attendees	
Councillors:	Barbara Driver (Chair), Anne Regan, Garth Barnes, Ian Bickerton, Chris Coleman, Tim Cooper, Jacky Fletcher, Wendy Flynn, Rob Garnham, Les Godwin, Penny Hall, Colin Hay (Vice-Chair), Rowena Hay, Diane Hibbert, Sandra Holliday, Peter Jeffries, Steve Jordan, Robin MacDonald, Paul Massey, Helena McCloskey, Andrew McKinlay, Heather McLain, Paul McLain, John Rawson, Diggory Seacome, Malcolm Stennett, Charles Stewart, Klara Sudbury, Lloyd Surgenor, Jo Teakle, Pat Thornton, Jon Walklett, Andrew Wall, John Webster, Paul Wheeldon, Simon Wheeler and Roger Whyborn

Minutes

1. PRAYERS

Reverend Tim Mayfield opened the meeting with a prayer.

2. APOLOGIES

Apologies had been received from Councillors Smith, Fisher and Britter.

3. DECLARATIONS OF INTEREST

The Mayor invited the Borough Solicitor to give some advice mainly for the benefit of Planning Committee members in connection with items 9 (Starevhall Farm petition) and item 16 (North Place and Portland Street).

The Borough Solicitor advised Planning Committee members that they were entitled to participate in the debate but there was a need for them to approach any future applications relating to Starvehall Farm and North Place and Portland Street with an open mind.

No interests were declared.

4. TO APPROVE AND CONFIRM THE MINUTES OF THE MEETING HELD ON THE 27 JUNE 2011

The minutes of the last meeting had been circulated with the agenda.

Upon a vote it was unanimously

RESOLVED that the minutes of the meeting held on the 27 June 2011 be agreed and signed as an accurate record.

5. PUBLIC QUESTIONS

No public questions were received.

6. COMMUNICATIONS BY THE MAYOR

The Mayor called for all members to stand for a minutes silence in memory of Amanda James, Elections Manager who had been with the Council since 1990, Ian Williams who had worked as a Visiting Officer in revenues for more than 20 years and Wendy Stanton, a cleaner at the Municipal Offices who had all passed away recently.

She had been asked to mention the Prestbury Memorial which she had been shocked and appalled to learn had fallen victim to vandalism.

She passed on the thanks of Tony Mason, who, on behalf of the Cheltenham Branch of the Royal Air Force, had written to thank the Aldermen and Councillors who had supported the Battle of Britain commemoration. He had commented that such a demonstration of civic support was deeply appreciated by all ages and ranks.

As part of Nightstops ten year celebrations, the Mayor had met with some Cheltenham based host families, whom she had thanked on behalf of the people of Cheltenham for the support they offer to homeless people.

She reminded members about the mock debate with sixth formers from a local school which was scheduled to take place in the Council Chamber at 10am the following day (Tuesday 11 October).

7. COMMUNICATIONS BY THE LEADER OF THE COUNCIL

For those colleagues that were not aware, the Leader confirmed that he had been notified by Gloucestershire County Council that the A4019 bridge would be shut for repair as it was in a potentially dangerous state. The current indication was that the bridge would be closed for one year from March 2012 and whilst he accepted that the repairs were wholly necessary he was concerned about the impact this would have on the town and the disruption that a year long closure would cause.

A response to the National Planning Policy Framework would be sent this week and whilst Cabinet felt that it was not practicable to set up a group as proposed by the Planning Committee, the letter that had been drafted did cover the comments made by that committee.

He echoed the sentiments of the Mayor in acknowledging the sad loss of staff recently, in particular, Amanda James, Elections Manager, who he worked with closely over the years in his role as an Election Agent. Her hard work and commitment to make 'every vote count' would be a great loss to the Council.

8. MEMBER QUESTIONS

The following responses were given to the member questions received.

1. Question from Councillor Smith to Cabinet Member Sustainability

	<p>Given the financial mess he has created by introducing his brown bin recycling scheme for green waste,</p> <ul style="list-style-type: none"> (i) Will the cabinet member give his word that he will not try to introduce any further stealth charges for recyclables, either by charging for additional bins or bags or by sending the public to facilities where they would be charged (ii) Will he specifically confirm that he will retain free recycling of green waste and other recyclables for members of the public who wish to take their own waste to the Cheltenham depot (iii) Will he confirm that he will resist any attempt to put financial or other barriers in the way of Cheltenham residents who wish to continue to recycle
	<p>Response from Cabinet Member Sustainability</p>
	<p>I do not accept the brown bin scheme is a mess, it is more than covering its costs, and had the administration retained the previous scheme, it would have cost the Cheltenham tax payer over £400,000 compared to the new scheme. The Council is working on various approaches to further increase take up of the new scheme.</p> <p>The questioner will know well that the annual local government settlement from central government never keeps pace with cost inflation. Further, the precise details of this year's settlement are not yet known. Given the ongoing need, year on year, to close this gap through the 'bridging the gap' process, I cannot give the sort of detailed open-ended assurances he seeks. I can however say that the regulations greatly limit the range of waste for which charging is permitted.</p> <p>All options are currently being examined, with a view to promoting those which maximise both recycling rates and minimise the burden on Council tax. I can also say that I envisage re-invoking the member working group on waste in the implementation of new schemes, e.g. for bagged waste, noting that those on this cross-party group have agreed that it has been very helpful.</p>
<p>2.</p>	<p>Question from Councillor Smith to Cabinet Member Sustainability</p>
	<p>Can the cabinet member confirm if he will be taking up the government's offer to fund the re-introduction of weekly refuse collection?</p>
	<p>Response from Cabinet Member Sustainability</p>
	<p>Full details of the offer are not yet known, but based on all we know so far, I have no intention of re-introducing weekly collections of <u>residual</u> waste.</p> <p>It is our experience that the recent introduction of <u>weekly food waste</u> collections, by this administration, combined with alternate weekly collections of refuse with dry re-cyclate has enabled recycling rates to increase from 35% to 50% in the first quarter of 2011/12. Moreover the new scheme has proved very popular with the public, with few reported</p>

	<p>complaints, and many plaudits. All the major increases in recycling figures have happened under Liberal Democrat administrations. It is also saving the local taxpayer approximately £500,000 per year in Landfill tax, though much of that net benefit flows to the County Council not the Borough. In short the new scheme has been a huge success, for which this council should be very proud, and upon which its officers have worked very hard and to great effect.</p>
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In the absence of the questioner, Councillor Smith, the questions were read by Councillor Seacome and the responses by the Cabinet Member Sustainability and there were no supplementary questions.

9. PETITION REGARDING STARVEHALL FARM AND PLAYING FIELDS

The Mayor referred members to Appendix 1 which set out the process for dealing with petitions at Council. She invited Councillor Hibbert, as petition organiser, to present the petition;

“We the undersigned petition Cheltenham Borough Council as follows: We wish the protection you have afforded Starvehall Farm and the recreation land adjacent to Prestbury Parish Council playing field in the local plan that ends in 2011 be included in the new Local Development Framework currently being developed”.

In her statement, Councillor Hibbert attributed the fact that the petition had in excess of 1700 signature,s to it being a vital open space to the communities which it separated, Oakley, Pittville and Prestbury.

In 2006, the Council found sufficient reason to afford the site protection, which the community were calling for again. She had attended a number of seminars recently at which it had been suggested that the number of new homes needed was being drastically exaggerated in the context of the economic climate.

In summary, she asked that Council consider whether housing needs could be met without surrendering Starvehall Farm and Playing Fields, taking account of the fact that local Schools were at full capacity and the NHS and Police resources were stretched in this area already. She welcomed the Officers comments on the environmental implications.

In response to a question from another member, the Leader confirmed that matters had progressed since the report was compiled and as such the issue would now be considered by the Planning Committee at their meeting on the 17 November.

The Mayor invited the Leader as the Cabinet Member whose portfolio was most relevant to the petition to speak on the subject of the petition.

The Leader understood the concerns of those that had organised and signed the petition. This was an important site but stressed Council could not assume the role of the Planning Committee.

In respect of the land at Starvehall Farm, no designation of this area was made by the Local Plan which had a plan end date of 2011. He reminded members

that all plan policies would be retained until replaced by the current Local Development Framework arrangements or its prospective successor.

He agreed with the issue raised about housing numbers and emphasised the difficulty associated with projecting needs 20 years in advance and he hoped that numbers would be included in the consultation as they would be key to the entire process.

The Leader hoped that colleagues would support the resolution set out in the report.

In response to a question, the Leader reiterated that all plan policies would be retained until replaced by the current Local Development Framework arrangements or its prospective successor. Cheltenham was however, in a stronger position than other areas to have its Local Plan upheld given that it was fairly modern (2006). A sentiment reaffirmed by a recent planning review which had commented that the Council had a good Local Plan.

Upon a vote it was unanimously

RESOLVED that officers consider the issues raised by the petition as part of the Local Development Framework or the new Cheltenham Local Plan.

10. REVIEW OF THE CONSTITUTION

The Cabinet Member Corporate Services introduced the report which had been circulated with the agenda. He explained that there had been an aim across the four authorities in the GO project to agree a common set of financial rules which would be a cheaper and more effective approach. He commended officers for the great job they had done in achieving this. He highlighted the reference to the strategic cross party member working group in paragraph 4.4. The consideration of the best way to scrutinise commissioning was now part of the scrutiny review and likewise the review of the overall commissioning plan was being carried out by the group leaders on a regular basis. Therefore he considered the strategic cross party member working group had done its job and could now be disbanded. He indicated that Cabinet portfolios in appendix 2.2 were slightly out of date and these would be amended and all members made aware.

A member suggested that the designations of Cabinet Members should be listed in the appendix rather than naming individuals which would eliminate the need to change the Constitution every time the membership of the Cabinet changed. The Cabinet Member Corporate Services considered naming individuals was quite helpful and typically portfolios changed at the same time as individuals and therefore an update to the Constitution would still be necessary. He did not consider updating the Constitution was a big issue. In response to a question he acknowledged the omission of the risk of scores in the risk assessment and would ensure they were added.

The Mayor was very keen to open up the Council meeting to members of the public by enabling them to ask questions without the need for too many rules and regulations. She indicated that she had brought this idea back from her visit to Göttingen in Germany and she had discussed it with the Chief Executive

and had e-mailed Councillors Smith and Colin Hay asking them to consider it as members of the Constitution working group.

Councillor Jordan advised members that Gloucester City had been doing this for some time with a slot in their Council meeting for the public to ask questions without notification. He said there was a balance to be achieved as members may not be able to respond to unnotified questions and will only be able to supply a written response at a later date. The challenge with notified questions was to find the shortest possible time to allow for guaranteed answers to be prepared and set the deadline accordingly. This would be a reasonable matter for debate.

Another member suggested that the first challenge was to get more public attending the meeting and this could be achieved by more publicity and making the meeting more interesting.

The Cabinet Member Corporate Services agreed that the Constitution working group would consider these ideas as part of their review of the procedural rules. He was in favour of encouraging the public to attend but the council was bound by process and must consider issues of cost when considering more publicity. For example many councils webcast their meetings but this was expensive and not something that the council could afford at this time.

Resolved unanimously that

- 1. The Financial Rules set out at Appendix 1 be approved for implementation on 1st April 2012.**
- 2. Authority be delegated to the Director of Resources, in consultation with the Chair of Audit Committee, to make any textual or other amendments to the Financial Rules approved under paragraph 1 above, which arise from further consideration by the GO partnership and which do not materially affect the approved Rules.**
- 3. Part 3 Responsibilities for Functions set out in Appendix 2 and the Corporate Policy Table in Appendix 3 be approved in principle subject to**
 - a. Leader/Cabinet approving the Executive Functions set out in Part 3E (Appendix 2).**
 - b. Consequential amendments to be approved by Council following further consideration by the Constitution Working Group.**
- 4. The progress of the Overview and Scrutiny Review be noted and the timescales be agreed.**

11. STATEMENT OF ACCOUNTS

The Chairman of the Audit Committee, Councillor Wall, explained that last year Council had delegated authority to the Audit Committee to review and approve the audited Statement of Accounts.

The Audit Committee had discussed the Statement of Accounts 2010/11 at their meeting on the 23 September and identified no issues for further investigation

and as such Councillor Wall had signed the accounts to signify their approval by the Council.

He highlighted that KPMG had described their audit of the financial statements as a 'model audit' owing to the excellent quality of the accounts and supporting papers. Staff were to be commended for this, given that this had been achieved in the first year of a new accounting system.

The Cabinet Member Corporate Services highlighted that not only had this been the first year of a new accounting system, officers had undertaken a sizeable piece of work to re-do last years accounts in order to draw comparisons, for which officers were to be congratulated.

Upon a vote it was unanimously

RESOLVED that Council note the decision of the Audit Committee to approve the Statement of Accounts for 2010/11, including the Annual Governance Statement and note that the Chair of the Audit Committee, Councillor Wall, signed the accounts to formally signify their approval by the Council.

12. REVIEW OF POLLING DISTRICTS, PLACES AND STATIONS

The Chief Executive introduced the report which formed part of the statutory duty to review polling stations, polling districts and polling places every four years.

As a result of the consultation exercise, three changes were suggested. Two of these suggestions were being recommended for approval and were set out in the report. The third suggestion was that the Polling Station at St. Michaels Cornerstone Centre changed to either Berkhamstead School or Cheltenham Town Football Club. Given that St. Michaels Cornerstone Centre was located in the centre of the Polling District and as the Elections Office had not received any previous complaints from electors in this polling district and nor were there any records of any incidents either in or surrounding the polling station, the existing polling station would remain.

The Chief Executive noted that if approved the consultation period would continue for a further six weeks, during which time individuals would have the right to make representations to the Electoral Commission.

Upon a vote it was unanimously

RESOLVED that the following changes to polling districts, places and stations be approved;

College Ward, Polling District FB – change from Naunton Park Primary School, Naunton Lane to Emmanuel Church, Fairfield Parade

Up Hatherley Ward, West Ward of the Parish of Up Hatherley – move Broad Oak Way and Caernarvon Close from Polling District SA to Polling District SB

Up Hatherley Ward, West Ward of the Parish of Up Hatherley – move 2-8 Coombe Glen Lane, Hollis Road and Hollis Gardens from Polling District SA to Polling District SC

Up Hatherley Ward, West Ward of the Parish of Up Hatherley – move 315 to 365 Hatherley Road from Polling District SA to Polling District SC

Up Hatherley Ward, West Ward of the Parish of Up Hatherley – move 15-25 and 22-36 Montgomery Road from Polling District SA to Polling District SC

Up Hatherley Ward, West Ward of the Parish of Up Hatherley – move 4-8 Greatfield Lane from Polling District SB to Polling District SC

The full list of polling districts, polling places and polling stations as set out in appendix 6 and 7 is published for a further period of six weeks, during which time individuals have the right to make representations to the Electoral Commission.

13. NOTICES OF MOTION

Councillor Bickerton, seconded by Councillor Jeffries, proposed the following motion;

“This Council considers there are alternatives to mass incineration of domestic waste. This is mature technology which has economic advantage both in the short-term and overall life cycle costs, more environmentally friendly, and compatible with the planned future improved recycling rates across the County.

The Council requests of Gloucestershire County Council, as part of the Waste Management Strategy of reducing Landfill, that alternative UK waste technologies are considered in detail along with the existing incinerator schemes being put forward for Javelin Park/Haresfield.”

Councillor Bickerton, as proposer of the motion, felt that there were three key elements for consideration in opting for any form of waste scheme namely economics, environment and health.

The Government’s Review of Waste Policy 2011 by DEFRA which was guided by what he described as a waste hierarchy, with prevention at the top, followed by, reuse, recycling and incineration. He did not consider burning waste to avoid landfill a very green policy, reporting that the UK burned a relatively small amount in comparison to other EU countries, just 9% at present.

The evidence of the medical hazards of incineration were getting harder to ignore. During his research of the issue he had considered several reports, including the 1996 Elliot publication, an extensive piece of work which collected data on all cancer patients within a 3km radius of 20 of the 72 incinerator sites – 14 million people. The research showed a 5-8% increase in risk of cancer near incinerator sites, which equated to over 11,000 cancer deaths a year.

He also read an extract from a fairly recent comprehensive report on The Health Effects of Waste Incinerators, 4th report of the British Society for Ecological Medicine, 2nd edition, June 2008, Dr Jeremy Thompson and Dr Honor Anthony (71pp)

“Since the publication of this report, important new data has been published strengthening the evidence that fine particulate pollution plays an important role in both cardiovascular and cerebrovascular mortality and demonstrating that the danger is greater than previously realised. More data has also been released on the dangers to health of ultrafine particulates and about the risks of other pollutants released from incinerators. With each publication the hazards of incineration are becoming more obvious and more difficult to ignore.”

Councillor Bickerton said he understood the importance of getting the economics of any waste strategy correct, but there was a need to protect public health and the environment.

Councillor Jeffries, as seconder of the motion, was invited to speak in support but had nothing further to add.

Councillor Whyborn, seconded by Councillor Wheeldon, proposed an amendment to add a third paragraph to the motion:

“Therefore Cheltenham Borough Council calls upon Gloucestershire County Council, to pause on the selection of incinerator schemes, until other processes have been fully evaluated in terms of their economic, health and environmental impact, and that these process comparisons must be objectively demonstrated, scrutinised and debated in public.”

Councillor Bickerton accepted the amendment and this became the substantive motion.

Councillor Godwin said that the wording of the motion gave the impression that the county council had not carried out an evaluation on the alternative options and asked for clarity on this matter.

It was noted that this question should be answered by the proposer of the motion at the end of the debate.

Speaking in support of the motion, the Cabinet Member Sustainability said that he had wrestled with the issue for some time and had not wanted to give his view until he had gathered evidence on a viable alternative. He had now visited the Mechanical Biological Treatment (MBT) plant at Avon which consisted of sorting technology followed by composting technology and a refused derived fuel which resulted in far less residual waste than incineration. He acknowledged the public concerns about incineration on the grounds of health especially but also the public had concerns about the cost and on environmental grounds. He was concerned about the secrecy of the County Council in publishing their findings on appraisals of alternatives which had made a meaningful public debate impossible. He felt that there should be a proper, informed and public debate on all the viable process options before the County Council went ahead with the £500 M purchase of the incinerator. If recycling was to increase in the future and residual waste reduced then the incineration may become uneconomic. For the collection authority smaller local plants which minimise lengths of journeys may be more favourable. He felt there should be a challenge to the County's Technology neutral approach as there was great public interest in the choice of technology.

Speaking against the motion, members made a number of points.

- The motion was not clear as it did not detail the alternative options for consideration.
- As a member of the county council, Councillor McLain said that a full evaluation had been done and there had been a technology neutral procurement process.
- The motion was three years out of date and any review at this stage would be costly and the county council may have to pay compensation to the contractor and continue to pay higher landfill charges.
- Cheltenham Borough Council had been given extensive opportunities to comment on the scheme but the Cabinet Member Sustainability had chosen to write a letter to the county council rather than make a formal reply to the consultation.
- Any alternative technologies such as mechanical biological treatment (MBT) still resulted in residual waste which had to be disposed of.
- The county council had had expert advice from Professor Harrison.
- It was disingenuous to raise health scares based on spurious research on Google.
- The contract allowed for flexibility should recycling rate increase in the future.
- If members opposing the proposals wanted smaller residual waste sites, it would be difficult to identify potential sites within the urban conurbation of Cheltenham.

Other members highlighted that it was a long process and it was never too late to stop and review something that was a matter of great public concern. Indeed new technologies may have arisen during the course of this process which now needed to be looked at and there were good examples at Swindon and other councils in the South West which could be studied. The county council appeared to be focusing too much on the financial aspects of the decision and playing down the health and environmental issues.

Councillor Hall, speaking as the Chair of the Environment Overview and Scrutiny Committee expressed her disappointment that at no point had any concerns been raised with the committee by the Cabinet Member Sustainability or any other members. It would have enabled the issue to be reviewed in a non political environment.

Regarding the consultation, the Leader advised that the council had tried to work closely with the county council but this was difficult as the county council had refused to share any details of the contract with district councils. Consequently the council had responded to the county on the location of waste sites but had made it clear that they did not have the details to respond on methods. He hoped there could now be a more public debate on this issue.

In his summing up as proposer of the motion, Councillor Bickerton disputed that any of the research he had referred to could be classed as "spurious" and was all from well respected sources. In response to the earlier question from Councillor Godwin, he said that the alternatives had not been investigated correctly and the county council should look closely at what was happening in

the South West. In terms of the economics, he advised that a UK government WRAP report, August 2008 found that in the UK, median incinerator costs per ton were generally higher than those for MBT treatments by £18 per metric ton; and £27 per metric ton for most modern (post 2000) incinerators.

He urged members to consider the health impact on the residents near the proposed sites of incinerators and support the motion.

Upon a vote on the motion as amended it was CARRIED.

(Voting: For 24, Against 8 with 4 abstentions)

14. TO RECEIVE PETITIONS

No petitions were received.

15. ANY OTHER ITEM THE MAYOR DETERMINES AS URGENT AND WHICH REQUIRES A DECISION

There was one additional urgent item which featured on the agenda as Item 19 (Local Government (Discretionary Payments) Regulations 1996).

16. NORTH PLACE AND PORTLAND STREET - PROGRESS UPDATE

The Mayor invited Jeremy Williamson, the Managing Director of the Cheltenham Development Task Force to make his presentation.

Jeremy Williamson advised that the presentation was in two halves, the first half would be open to the public but the second half would need to be taken in exempt session given the financial and commercially sensitive content. The public would be permitted to return to the chamber for the debate.

He apologised on behalf of Graham Garbutt, the Independent Chair of the Advisory Board, who had hoped to attend but was unable to for medical reasons.

He introduced the presentation (see attached) and highlighted that the number of residential properties referred to in the presentation, 122, differed from the 130 referenced within the report that was circulated in advance of the meeting. This was a consequence of the decision to create more houses and less apartments.

The following responses were given by Jeremy Williamson to questions from members;

- Construction time would be 18 months.
- Diverts to alternative parking would be in place but there were no funds for an electronic signage system.
- Cosmetic improvements could be made to the Grosvenor Terrace car park, though this would require funding.
- The revised development brief for this site was approved by Council in December 2010. The brief allowed for uses including residential, commercial and/or leisure and therefore did not exclude a hotel or food store.

- It would be for the Planning Committee to undertake an Impact Assessment in determining whether there was a need for a hotel and ultimately the planning application.
- The level of response to the consultation (168 of a possible 120,000 residents) was an unfortunate reality of any such consultation. Key issues had been identified as a result of the exercise which would be addressed by the applicant. There would be further consultation at the appropriate time.
- An option for underground/croft parking was included in the development brief but not stipulated. The proposed scheme did include residential under-croft parking.
- An exact figure for those against the proposal for a food store would be made available to Councillor Godwin outside of the meeting.

The Mayor moved a resolution and it was;

RESOLVED that in accordance with Section 100A(4) Local Government Act 1972 the public be excluded from the meeting for the remaining agenda items as it is likely that, in view of the nature of the business to be transacted or the nature of the proceedings, if members of the public are present there will be disclosed to them exempt information as defined in paragraph 3, Part (1) Schedule (12A) Local Government Act 1972, namely:

Paragraph 3; Information relating to the financial or business affairs of any particular person (including the authority holding that information)

Members of the public were ushered from the public gallery.

Jeremy Williamson talked through the slides of the presentation which contained financial and commercially sensitive information and answered questions relating to this information.

Once discussion had concluded, members of the public were welcomed back to the Chamber.

The Mayor addressed the public and explained that she had been contacted by members of the public who were under the impression that this item would go before Council in November.

Whilst she understood their concern about the change of date, this item was simply giving Council an opportunity to make its views known to the Cabinet in advance of them making a decision on Tuesday 18 October. She reassured members of the public that they were able to put questions to the Cabinet. Members called for the deadline to be extended from 10am on Tuesday 11 October to 10am on Thursday 13 October. This was agreed and would be publicised on the website.

Those speaking in defence of the scheme had been impressed with the process thus far and urged those with concerns to consider the bigger picture and accept that there would be elements of any scheme that some people would not fully support.

Councillor Wheeldon spoke as the Ward Councillor for the St. Pauls area and as a resident of Cheltenham, living within 300 metres of the site. The majority of residents within his Ward had welcomed the inclusion of a food store and personally, he was delighted that the new homes would be constructed to code 4 sustainability, resulting in utility bills 30-40% lower than average. He put forward Crabtree Place as a short term parking solution and queried whether parking at the Prince of Wales Stadium could be considered as a long term solution.

The Leader apologised to the public for any confusion regarding the date on which this item would come before Council. The decision was for Cabinet but given the magnitude of the decision it was important that Council were in agreement. Ultimately the Council could only proceed with something that a developer was willing to deliver and Council had agreed the scheme brief in December. This was not to say that the Planning Committee did not have a role to play.

The Cabinet Member Built Environment thanked his Council colleagues for what had been a generally positive discussion and welcomed the acknowledgement of some members that there were many varying aspirations for the site, which included concert halls, ice rinks, etc. He accepted that there were concerns, including those legitimate concerns of residents in close proximity to the site about short and long term parking solutions.

Upon a vote it was unanimously

RESOLVED that Council recommend to Cabinet that it should appoint Augur Buchler Partners Limited as the preferred bidder to undertake the redevelopment of North Place and Portland Street sites.

17. LOCAL GOVERNMENT ACT 1972 -EXEMPT INFORMATION

The Council was recommended to approve the resolution as set out on the agenda.

Upon a vote it was unanimously

RESOLVED that in accordance with Section 100A(4) Local Government Act 1972 the public be excluded from the meeting for the remaining agenda items as it is likely that, in view of the nature of the business to be transacted or the nature of the proceedings, if members of the public are present there will be disclosed to them exempt information as defined in paragraph 3, Part (1) Schedule (12A) Local Government Act 1972, namely:

Paragraph 3; Information relating to the financial or business affairs of any particular person (including the authority holding that information)

Members of the public were asked to vacate the gallery.

18. TREASURY MANAGEMENT ISSUE

The Chief Executive introduced the exempt report which had been circulated with the agenda. The report asked Council to note a decision that the Chief Executive had taken on a financial matter following the urgency procedures set out in Rule 4 of the Council's Constitution.

Resolved to note the report.

19. REQUEST FOR DISCRETIONARY ALLOWANCE UNDER THE LOCAL GOVERNMENT (DISCRETIONARY PAYMENTS) REGULATIONS 1996

The Director of Human Resources and Organisational Development provided members with a verbal briefing update on the developments regarding the discretionary payment to a former employee of the council. Members were given the opportunity to ask questions on the information they had been given.

The Director of Human Resources and Organisational Development undertook to provide appropriate briefings as required.

Barbara Driver
Chair

North Place & Portland Street

Council Meeting

10th October 2011



Process

- OJEU framework – competitive dialogue
- 4 bids evaluated down to 2
- Final bidder – Augur Buchler
- Public engagement exercise
- Receipt of final bid including
 1. Scheme designs recognising that this is not a planning application
 2. Financial proposal
 3. Legal structure



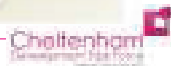
Site connections



Aerial View



Trinity Square



Positive coverage



North Place and Portland Street Car Parks Redevelopment
 An exciting new development in the heart of Cheltenham town centre.
 52% in favour
 45% against
 3% no preference

Public engagement

Scheme evolution

- Feedback from planning team and public has influenced design
- Planning team continue to support the overall scheme
- Issues of detail will need to be resolved prior to any planning application

What is being delivered?

- 122 housing units (39 houses & 83 apartments) – of which 40% affordable
- Bus node
- 2 Public squares
- Foodstore
- Hotel 102 beds
- Improved linkages with town centre

Public concerns

- Amenity impacts on near neighbours
- Impact of foodstore and hotel
- Traffic impact

All of which will be dealt with through the planning process - impact assessment

- Architectural style
- Car parking solution

These are a response to the brief and commercial decisions

Other concerns

- Will we meet the Brewery public inquiry requirements?
- What happens during construction?

800 car space requirement

- Brewery development public inquiry outcome
- Target 800 spaces to be maintained in the vicinity
- This will be maintained by provision at
 - North Place 300
 - NCP 365
 - High Street 126
 Total 791

What happens during construction?

- Existing capacity $484 + 329 = 813$ with an occupancy rate of 76% = 618
- Need to utilise existing spare capacity in:-
 1. Grosvenor Terrace c300 spaces
 2. NCP opposite Brewery c120
 3. Beechwood c150
 4. High street 30
 5. St James's 65
- Short term financial loss



Next Steps

- 14/10/11 consideration of scheme by Development Task Force
- 18/10/11 Cabinet decision
- Potential call-in, followed by OJEU "standstill notice" followed by Award Notice
- Target 16/11/11 exchange of contracts
- 01/02/12 target planning application



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Cheltenham Borough Council
Council – 10 November 2011

Joint Core Strategy: developing the preferred option
Report of the Leader

Accountable member	Councillor Steve Jordan
Accountable officer	Jane Griffiths, Director of Commissioning
Accountable scrutiny committee	Environment
Ward(s) affected	All
Executive summary	<p>Following proposals set out in the Decentralisation and Localism Bill (2010); Cheltenham Borough Council is now the decision maker in determining long term development needs for the Borough. The importance of this change is significant and Cheltenham now needs to identify the provision for meeting the Borough's development needs. The Joint Core Strategy (JCS) is the strategic development plan being prepared to help determine these long term needs over a plan period to 2031.</p> <p>The JCS recognises that coherent spatial planning requires local authorities to look beyond its immediate administrative boundaries; the JCS therefore provides a framework for development in Cheltenham, Gloucester and Tewkesbury for the next 20 years to 2031. Looking beyond the immediate built up boundary for Cheltenham results in the need for debate around meeting long term needs and the potential resultant incursion into the green belt and the wider countryside. This is a contentious issue for the Borough.</p> <p>To ease consideration the 20 year period has been broken down, firstly looking at the first 10 years up to 2021 and secondly the last 10 years of the plan 2021 – 2031.</p> <p>This report summarises the Developing the Preferred Options document and seeks Council approval to publish the document for public consultation. The purpose of the Council meeting is to enable the JCS to progress to the arena of wider public debate and draw out areas of concern arising from members in respect of the emerging document.</p> <p>Based on Cheltenham Community Strategy, the council's corporate strategy sets out the council's vision for the area and the JCS is a way in which these strategic objectives might be met; particularly to address the issue of affordable housing.</p> <p>Publication of the JCS for public consultation will enable residents in the JCS area and wider stakeholders to engage in a meaningful dialogue and debate about the future of the area, particularly what they will want the urban and rural areas to be like in 20 years time, and how we might be able to accommodate housing need whilst at the same time protecting the things we value and hold dear about the area.</p>

Recommendations	<ol style="list-style-type: none">1. Council approve publication of the draft “Developing the Preferred Options Consultation Document”, set out in appendix 1, for the purposes of consultation;2. Council notes that the officer recommendation is that of the 4 illustrative scenarios presented Scenario B would best meet the assumed development needs of the Joint Core Strategy area for the first 10 years of the plan period to 2021;3. Council notes that Scenario A is the only one that would protect the current green belt;4. Council confirms its intention to protect green belt and open countryside around Cheltenham;5. During the consultation stage (December 2011 – February 2012) further assessment of scenarios is undertaken for Cheltenham and reported back to Council alongside responses received to the 4 scenarios set out in the consultation document by the communities of Cheltenham and wider stakeholders;6. Council requests that the further work includes testing more radical approaches to defining affordability which help meet local housing need;7. Appendix 2: Response Report on Consultation Carried out to date (October 2011) is published as part of the consultation exercise;8. Appendix 3 The Sustainability Appraisal is published as part of the consultation exercise;9. Authority be delegated to the Director of commissioning in consultation with the Leader to make any necessary minor revisions to the draft document prior to publication taking account of any issues arising from the consideration of the document by Tewkesbury Borough Council and Gloucester City Council.
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Financial implications	<p>Cheltenham Borough Council has committed £60,000 along with Gloucester City Council and Tewkesbury Borough Council for 2011/12 to support delivery of the JCS. The JCS reserve has a balance of £234,580 carried over from 2010/11 to support the current and future funding of the joint working arrangements, including completion of the evidence base and future contribution to meeting costs of an independent examination. However further funding is required from 2012/13 to meet Cheltenham's costs in relation to reviewing the wider local plan as the Local Plan reserve will have been fully utilised in 2011/12. Future consideration will be required to approve a new budget for this.</p> <p>Contact officer: Andrew Sherbourne – Principal Accounting Technician</p> <p>andrew.sherbourne@cheltenham.gov.uk, 01242 264337</p>
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<p>Legal implications</p>	<p>The JCS is produced for consultation as the key document in the Council's Local Development Documents produced jointly with the Councils of Gloucester City and Tewkesbury Borough.</p> <p>Developing the Preferred Options document on approval by Members for public consultation should be given some weight for development control purposes. Members will be given advice on how much weight it is appropriate to give at the time an application is determined. The weight to attach to the document will depend on the stage it has reached and will increase as successive stages are completed. The nearer the JCS proceeds to formal adoption the greater the weight it will have.</p> <p>The Decentralisation and Localism Bill is expected to receive Royal Assent at the end of 2011. This includes the Government's intention to abolish Regional Spatial Strategies. The JCS is being progressed on the basis that it is anticipated that the South West Regional Spatial Strategy will no longer be part of the development plan when the JCS is submitted for examination.</p> <p>The statutory requirements for public consultation in the development plan process are set out in the Council's Statement of Community Involvement published under section 18 of the Planning and Compensation Act 2004 ("the Act").</p> <p>The statutory process for adoption of local development documents is set out in the Act and requires the Council to produce the relevant documents in accordance with the Act and Regulations and to engage in public consultation on those documents. Once the Councils are satisfied that the development documents are ready they must, under section 20 (1) of the Act submit them to an independent expert for examination. The expert will be an Inspector and the purpose of an independent examination of the joint core strategy is to determine:</p> <p>(a) whether it satisfies the requirements of sections 19 and 24(1) of the Act and Regulations as specified and</p> <p>(b) whether it is sound</p> <p>To be sound a core strategy should be justified, effective and consistent with National Policy.</p> <p><i>"Justified" means that the document must be:</i></p> <ul style="list-style-type: none"> • founded on a robust and credible evidence base • the most appropriate strategy when considered against the reasonable alternatives <p><i>"Effective" means the document must be:</i></p> <ul style="list-style-type: none"> • deliverable • flexible • able to be monitored <p><i>"Consistent with National Policy":</i></p>
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National Policy includes the emerging National Planning Policy Framework (NPPF) which was produced in draft for consultation in July 2011. Members have made a number of comments and objections to this. The draft NPPF is a consultation document. There have been extensive and well publicised consultation responses suggesting the Government will be subject to considerable pressure for significant changes before final publication. The weight to be attached to its draft policies will be for the decision maker. It advocates a simpler framework for the planning system and a presumption in favour of sustainable development at its heart.

The draft NPPF states that for the purposes of the planning system, delivering sustainable development involves three particular roles: an economic role, a social role and an environmental role. It includes a set of draft 'Core Planning Principles' that underpin the planning system, the first of which is a reaffirmation that planning should be genuinely plan-led. The core principles also include the need to take into account the environmental quality of land and to seek to protect environmental assets. The duty upon planning authorities to cooperate on planning issues that cross administrative boundaries is also emphasised. The adoption of a JCS for Tewkesbury, Gloucester and Cheltenham is obviously in furtherance of a plan-led approach to planning in the area.

In terms of the weight to be given to the draft NPPF the advice to planning Inspectors says that the draft NPPF is likely to be referred to by the parties in the current appeal and development plan case work. It is capable of bring a material consideration, although the weight to be given to it will be a matter for the decision maker in each particular case.

Emerging NPPF requires strategic planning across local boundaries and expects joint working between authorities on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities – duty to co-operate on planning issues that cross administrative boundaries. The guidance goes on to refer to Local Planning Authorities working collaboratively on strategic planning priorities to enable delivery of sustainable economic growth in consultation with Local Enterprise Partnerships.

The preparation and content of the JCS Preferred Options Consultation Document is consistent with the requirements of the emerging National Policy Framework and demonstrates co-operation between the authorities.

The focus of the Examination is on soundness of the plan as a whole and is not restricted to those matters that have been objected to. The Council is required to accept the recommendations of the Examiner and the only choice open to a local planning authority that does not want to accept the Examiner's recommendations is to not adopt the plan. This procedure may be changed as there are proposals relating to this in the Localism Bill.

The only possible legal challenge to the plan once it has been adopted is to the High Court within 6 weeks of adoption by a "person aggrieved". Challenge must be on the grounds set out in the Act which are broadly that the document is not within the appropriate power or a procedural requirement has not been complied with. The grounds are thus fairly narrow and the time scale for challenge short so that there is certainty as to the validity of the documents. The Secretary of State has powers of intervention and direction in relation to the plan making process.

It is relevant for Members to be aware that the Localism Bill proposes a new duty on local authorities to co-operate with each other. This duty will be relevant, if the Bill is given royal assent, as it requires local authorities to engage constructively, actively and on an ongoing basis with other local authorities in developing their JCS documents.

Contact officer: Peter Lewis – Head of Legal Services 01684 272012
Peter.Lewis@tewkesbury.gov.uk;

Jonathan Noel – Solicitor 01684 272690 Jonathan.Noel@tewkesbury.gov.uk

<p>HR implications (including learning and organisational development)</p>	<p>The progression of the JCS is a major logistical task. Considerable human resource is required for the collation and assessment of evidence, formulation of policy and extensive consultation with the public and stakeholders. At present, this resource is being provided by the planning teams within the 3 Councils of Gloucester, Cheltenham and Tewkesbury and through the JCS budget. Overall resource requirements will require close monitoring going forward.</p> <p>Contact officer: Julie McCarthy HR Operations Manager julie.mccarthy@cheltenham.gov.uk , 01242 264355</p>
<p>Key risks</p>	<p>CR 33 - If the council does not keep the momentum going with regards to the JCS then the policy vacuum left by the abolition of the RSS and the resultant delay in projections and framework could result in inappropriate development.</p>
<p>Corporate and community plan Implications</p>	<p>The JCS sets out a vision for the area based upon previous consultation with a range of stakeholders. The vision reflects the issues which are within the council's own corporate strategy and within the Cheltenham community strategy.</p>
<p>Environmental and climate change implications</p>	<p>The JCS must go through a sustainability appraisal process which considers the environmental, social and economic outputs of the plan and ensures that development meets the needs of both present and future generations. An initial sustainability appraisal report will be published alongside consultation document, and is attached at Appendix 3.</p>

2.0 INTRODUCTION / BACKGROUND

- 2.1 All local authorities are under a statutory obligation to prepare a development plan; the most important part of this plan is the core strategy, which establishes the long term strategic direction for each area including identification of development requirements.
- 2.2 In 2008 Gloucester, Cheltenham and Tewkesbury Councils agreed to prepare a single core strategy covering the entirety of the administrative areas of each of the Councils, which would consider and plan for the future development needs of the area up to 2031. Many of the characteristics and the issues which the area faces, such as flooding, outstanding landscape and the need to plan for sufficient development to provide jobs and housing for future residents are common across the area. There are strong functional, economic, infrastructure, policy and cross boundary relationships which mean that working together on a Joint Core Strategy makes good planning sense. The Joint Core Strategy (JCS) is based on collaborative research into the three authority areas' characteristics, relationships (with each other and adjoining areas), past trends and future predictions. This information forms part of the evidence base for the plan and can be seen on the JCS website ([www.gct-Joint Core Strategy.org](http://www.gct-Joint-Core-Strategy.org)).
- 2.3 The Government is proposing to abolish the Regional Spatial Strategies (via the Localism Bill) and give local authorities the opportunity and responsibility to identify strategic development requirements for the next 20 years. As such it is essential that Cheltenham puts in place a long term strategic plan that will guide future development of the Borough based upon a robust evidence base. Working collaboratively with Gloucester City and Tewkesbury Borough means that Cheltenham Borough Council can seek to address its corporate priorities and wider Community Plan objectives and aspirations within a wider context addressing key issues such as affordable housing, infrastructure delivery, connectivity to wider green spaces and countryside etc.
- 2.4 The changes brought forward by the Localism Bill brings decision making to the local level,

this is supported. However the significance of the decision of identifying long term development needs cannot be underestimated. In Cheltenham the contention exists between meeting the long term needs of the Borough and the impacts of incursion into the green belt and the wider countryside.

2.5 Gloucester, Cheltenham and Tewkesbury are each required to consider the 'Developing the Preferred Option' report and approve for the purposes of public consultation. Tewkesbury Borough was the first of the 3 Councils to consider the document on 26th October and resolved the following:

1. That Council approves the publication of the draft "Developing the Preferred Options Consultation Document", set out in Appendix 1, for consultation.
 2. That, based on the evidence which has currently been considered, and of the 4 scenarios in the document to be published for consultation, the Council consults with the public on the basis that Scenario B appears to best meet the development needs of the Joint Core Strategy area for the first 10 years of the Plan period to 2021.
 3. That Appendix 2: Response Report on Consultation Carried Out To Date (October 2011) is published as part of the consultation exercise.
 4. That Appendix 3: The Sustainability Appraisal Is published as part of the consultation exercise.
 5. That authority be delegated to the Corporate Head of Borough Development, in consultation with the Tewkesbury Members of the Joint Core Strategy Member Steering Group, to make any necessary minor revisions to the draft document prior to publication taking account of any issues arising from the consideration of the document by Cheltenham Borough Council and Gloucester City Council. Any major changes to be brought to Council on 29 November.
 6. That during the consultation stage, December 2011 to February 2012:
 - 1) further assessment of scenarios and locations using the published Tewkesbury, Gloucester & Cheltenham SHLAAs is undertaken
 - 2) further Strategic Flood Risk Assessment Level 2 will be carried out, the scope of that work being defined by the Executive Committee and will be reported to the Council alongside the consultation responses received.
- That the Executive Committee will, when considering the scope of the further Strategic Flood Risk Assessment Level 2 work, consider and determine the timing of the production of supplementary guidance on flooding.

Gloucester City will be considering the emerging JCS at a meeting of Policy Sub Committee on 10th November and subsequently at Council on 24th November 2011.

2.6 What is the Developing the Preferred Option document?

The Developing the Preferred Options consultation document, attached as appendix 1, builds on previous consultations and sets out how the area could evolve, identifying potential strategic allocations and broad locations for delivering housing and employment and other strategic requirements. A report on the previous consultation to date is attached as appendix 2.

2.7 Once considered, and if approved by each of the three Councils, the document will be published for public consultation from 13 December 2011 until 12 February 2012 (9 weeks). Alongside the JCS, the wider evidence base is also available for public scrutiny. Comments arising in response to the emerging JCS will then be used to inform the

Preferred Option Document to be published for further consultation in summer 2012, before the final version of the JCS is submitted to the Secretary of State for independent examination in autumn 2013. It is important to note that the JCS presented to Council is very much a draft document – to be tested via public debate and scrutiny.

3.0 SUMMARY OF THE JOINT CORE STRATEGY – DEVELOPING THE PREFERRED OPTIONS CONSULTATION DOCUMENT

3.1 The document falls into 3 main sections:-

1. description, vision and strategic objectives
2. development strategy and scenarios for development
3. development management policies

3.2 *Description, vision and strategic objectives*

In this section there is a brief description of the plan area with particular focus on the key current population characteristics and the local economy and employment.

3.3 The vision for the JCS is to produce a strategy which fosters growth in the local economy and provides sufficient homes in sustainable locations, without increasing the risk of flooding or harming high quality landscape, whilst maintaining the separate vitality, identity and character of individual settlements. As part of the vision, the document outlines what this approach might mean for each part of the JCS Area.

3.4 Ten strategic objectives have been identified, which the strategy will seek to achieve:-

- Address the causes and consequences of climate change
- Manage and reduce flood risk
- Allocate strategic development in support of sustainable urban and rural communities and the conservation of strategic open space
- Conserve and improve the built environment
- Conserve and improve the natural environment
- Foster economic growth
- Provide for local housing need
- Address social inequality, inclusivity and provide for healthier and safer community
- Improve skills and educational attainment
- Increase access to jobs/services via sustainable transport modes

These strategic objectives were arrived at through consultation with Local Strategic Partnerships, public and wider stakeholder consultation and engagement. The challenge for Cheltenham is delivering a balance between what's important for the communities of the Borough, maintaining quality of life and conservation of the natural and built environment whilst delivering development which meets local needs. These challenges will be tested via a series of key questions developed to provide a framework to the consultation. These questions will be agreed with the JCS Member Steering Group in advance of the consultation.

3.5 Development Strategy and development scenarios - What scale of development is required?

The Government has set out that with the proposed revocation of regional housing and employment targets it will be the responsibility of local planning authorities to establish their own housing and employment requirements based upon local evidence of the need for new homes and jobs. This is a major change and a significant decision for Cheltenham Borough Council; as such it is essential that the Council takes a long term view, taking account of all relevant evidence.

3.6 For the JCS authorities, the primary evidence on the need for new homes is found within the local population and demographic projections published by Gloucestershire County Council (May 2011). This provides the authorities with a good basis for understanding how population levels will change over the plan period, taking account of both indigenous and migrant demand for new housing. Clearly however projections will not be 100% accurate – they extrapolate past trends and apply these trends directly to the future; as such they cannot take into account the impact of potential changes in policy or variations in the trend due to external influences – such as the economy. These concerns are shared with Members and through debate some Members have questioned the validity and accuracy of projections. The Office for National Statistics have addressed the issue of accuracy and in an analysis of national population projections in 2007 considered that the margin of error in projections was around 2%. Notwithstanding this, Members concerns are valid and in moving forward the JCS it will be essential that monitoring at key stages is built into the strategy and the strategy adjusted accordingly if required.

3.7 To address the uncertainties around projections, part of the JCS evidence base is an innovative tool; the “Gloucestershire Affordability Model”. This model aims to forecast ‘how the future might look’ focussed on different aspects of the housing market such as affordability and need, identifying potential changes in trend over time. All 4 scenarios set out in the JCS have been tested via this model.

3.8 Demographic projections are just part of the suite of evidence to inform the debate on the level of development required, capacity has been assessed via Council monitoring of residential land and analysis via Strategic Housing Land Availability Assessments.

3.9 In planning for new homes it is also important to make sure that there are sufficient opportunities for creating new jobs for people living in the JCS area and wider Gloucestershire. For this the authorities are using the most up to date information on local and national economic job projections as set out below.

3.10 How many homes need to be provided for?

The most recent local projections provided by Gloucestershire County Council have forecast that the JCS area will have a population of 367,800 people by 2031. This is a rise of over 45,200 compared to an estimated 322,600 people living in the area in 2011. Using this information it estimated that the number of new homes required in the JCS area is 36,800 (assuming that **all** of the demographic projection will be met), which means that 1,840 new homes would need to be provided every year until 2031.

3.11 In identifying how many new homes need to be provided some very difficult balances need to be made, such as delivering a step change in affordable housing, creating the right environment for a prosperous economy and creating places and spaces which have a positive impact on the quality of the environment, quality of life and well being of residents, workers and visitors to the Borough. It is clear from the previous consultation to date, that many people have concerns about housing growth and the potential implications for development of greenfield sites both within the existing urban area of Cheltenham and at its boundaries, together with the affect upon existing communities. These are all important considerations and concerns; therefore, in developing the JCS, consideration has been given to meeting housing need within existing urban areas and through existing planning

permissions; and through the provision of 2,400 dwellings in the rural parts of Tewkesbury Borough. It is estimated that this would provide approximately 16,200 homes over the plan period to 2031.

3.12 Analysis undertaken by Gloucestershire County Council indicates that in Cheltenham, the driving force behind the demand for new housing comes from the indigenous population. In 2004 - 2009 75% of all new households were formed from within the indigenous population compared to 25% of new households attributable to net migration. This raises questions around defining local need and what level is achievable for Cheltenham. These issues will be drawn out within consultation questions included within the JCS when made available for public consultation

3.13 While the estimated number of new homes needed every year in the JCS area is 1,840 based upon demographic projections, the consultation document proposes that the communities, businesses and wider stakeholders of Cheltenham be given the opportunity to comment on whether this is the appropriate level to plan for, or whether the authorities should plan for a higher or lower number of homes.

3.14 4 scenarios are presented for consultation :-

- Scenario A 16,200 homes (810 per year: 220 of which would be required in Cheltenham) – based on accommodating urban capacity only together with windfalls in the last 10 years and 2,400 across the wider rural areas
- Scenario B 33,200 homes (1,660 per year: 520 of which would be required in the Cheltenham wider area) – based on accommodating 90% of the demographic projection (similar to annual housing delivery 2006 – 2011)
- Scenario C 36,850 homes (1,840 per year: 580 of which would be required in the Cheltenham wider area) – based on accommodating 100% of the demographic projection
- Scenario D 40,500 homes (2,025 per year: 640 of which would be required in the Cheltenham wider area) – based on accommodating an additional 10% on top of the 100% demographic projection (similar to annual housing delivery 2006 – 2008)

3.15 ***How many jobs should we provide for?***

Previous consultation has established the importance of creating jobs and improving the competitiveness of the area. This reflects the Gloucestershire Local Enterprise Partnership's (LEP) ambition to drive economic growth, improve productivity through increasing Gross Value Added (GVA) and encouraging business creation. It also reflects the vital role Cheltenham plays in supporting the economy of Gloucestershire and contributing to the vibrancy of the wider region.

3.16 To estimate the number of jobs to plan for, the latest economic job forecasts have been used to provide employment land requirements. There are about 177,000 jobs in the JCS area at present. There are a range of forecasts for the area which suggest an increase of between 20,000 to 35,000 new jobs over the period to 2031. Not all of these jobs, however, will require additional employment land and it is important to acknowledge this in identifying areas for new employment land provision. Using the JCS economic evidence base it is estimated that the range of additional employment land required would be between 34 and 62 hectares. Further work is needed to refine these requirements but at this stage a mid point of 46 hectares is included in the strategy and included in the development scenarios B, C and D.

3.17 ***Proposed development hierarchy***

The proposed development strategy would focus development on the principal urban areas of Gloucester and Cheltenham, close to the main centres of population and employment to

make the best use of land, existing infrastructure and deliver regeneration. Where the urban capacity cannot accommodate all of the development required, the next most sustainable areas for development are considered to be those adjoining the urban areas. Beyond this, development would be located in and adjoining Tewkesbury Town, recognising its role as a major market town. In addition, smaller levels of development would be accommodated in and adjoining the rural settlements. Further work is required to develop the rural strategy further.

3.18 ***Locations for accommodating development***

A number of potential strategic allocations have been identified which would provide the level of development required in the first 10 year of the plan to 2021. Further work is required to identify options for the second 10 years of the plan 2021 – 2031.

3.19 The potential strategic allocations include:-

Gloucester wider area - 13,750 new homes

This includes 6,500 homes within Gloucester, 1,900 within the Gloucester wider area falling within Tewkesbury Borough and potential strategic allocations within Tewkesbury Borough at Innsworth (3,100 homes), Brockworth (1,500 homes) and Churchdown (750 Homes).

Cheltenham wider area - 10,050 new homes

This includes 6,800 homes in Cheltenham – including commitments, sites identified via strategic housing land availability assessment and windfalls together with 1,800 homes within the potential strategic allocation at North West Cheltenham and 1,300 homes within the potential strategic allocation at South Cheltenham. A further 3,250 homes could be provided within Tewkesbury Borough including 2,650 homes within the strategic allocation site at North West Cheltenham, and commitments of 350 homes at Farm Lane and 250 homes at the former M & G sports ground.

Tewkesbury Town wider area – 3,230 new homes

This would include 1,130 homes already permitted and allocated in the Tewkesbury Borough Local Plan and a strategic allocation of 2,100 new homes at Ashchurch.

3.20 The potential strategic allocations have been subject to detailed assessment and informed by the wider evidence base of the JCS including;

- Strategic Flood Risk Assessment
- Green Belt Review
- Broad Locations
- Strategic Housing Land Availability Assessments
- Residential Land Availability Assessment
- Employment Land Review
- Sustainability Appraisal
- Habitats Regulation Assessment
- Gloucestershire Affordability Model

3.21 The capacities across the JCS together with potential strategic allocations indicate where development might be located in terms of the wider urban areas, and would involve Tewkesbury Borough accommodating 43% of the housing need for Gloucester City and 32% of the housing needs of Cheltenham Borough.

3.22 Even with the potential development identified above, there would still be a shortfall between the level of housing provided and the projected level of housing need to 2031 with each of the four scenarios, as follows:-

- A shortfall = 20,600 homes across JCS area (delivery of 4,333 new homes within the Cheltenham wider area – *shortfall of 7,204 if assessed against 100% demographic projection*)

- B shortfall = 3,700 homes across JCS area (delivery of 10,384 new homes in the Cheltenham wider area – shortfall of 301)
- C shortfall = 7,400 homes across JCS area (delivery of 11,537 new homes within the Cheltenham wider area - shortfall of 1,454)
- D shortfall = 11,000 homes across JCS area (delivery of 12,691 new homes within the Cheltenham wider area - shortfall of 2,668)

- 3.23** It is proposed to address the projected shortfall by considering three potential themes for the distribution of further development in the later stages of the plan period, i.e. beyond the first 10 years – after 2021. These would be based on either;
- maximising economic opportunities,
 - protecting the green belt or
 - making the best use of existing infrastructure.
- 3.24** The implications of each theme are set out in the consultation document in terms of what this might mean for further development in the second period of the plan from 2021 to 2031. There are no specific locations identified in this context but the consultation document does indicate potential areas which could be investigated further under each theme. Any such work would be carried out following the consultation as the next stage of the preparation of the Joint Core Strategy.
- 3.25** As part of the background evidence, the 3 Councils have carried out work looking at the rural areas and have defined a settlement hierarchy. This consists of:-
- The urban areas of Cheltenham and Gloucester and adjoining settlements
 - Tewkesbury town and adjoining settlements
 - Larger rural settlements, such as Bishops Cleeve, Highnam and Winchcombe
 - Medium sized villages, such as Brockhampton and Norton
 - Small villages such as Barrow and Prescott
- 3.26** This hierarchy is based on an audit of each settlement in terms of the services and amenities within the village and the distance to an urban area. An indicative figure of a total of 2,400 homes across the rural area for the length of the plan has been included in each of the scenarios. This would be equivalent to 120 homes a year. The public consultation will seek views on whether this level of development is reasonable, desirable and achievable. The consultation will also ask for local communities to advise the Council if they believe that there are sites within or adjoining the village where development could make a positive contribution to the health and future of the community.
- 3.27** ***Officer recommendation on scenarios***
As outlined above, the scenarios set out in the emerging JCS document have been informed by a wide evidence base including both traditional approaches such as demographic projections, assessment of the economy and landscape together with more innovative approaches including the Gloucestershire Affordability Model. The evidence base is extensive and key elements have been drawn together to reach conclusions on the 4 scenarios; all of which have been tested via Strategic Environmental Assessment/Sustainability Appraisal, provided at appendix 3.
- 3.28** Taking into account all evidence currently available; of the 4 scenarios set out in the JCS document it is the professional advice of officers that Scenario B would best meet the development needs of the Joint Core Strategy Area for the first 10 years of the plan period

to 2021. Scenario B takes account of the limit of urban capacity available within the built up area of Cheltenham whilst still delivering a 5 and 10 year supply of housing thereby contributing to affordable housing and contribution to economic performance. Clearly however, this scenario would require development outside the defined built up boundary of Cheltenham (61% of overall development) and result in incursion into the green belt and the wider countryside. It is appropriate that this is considered and debated with stakeholders and the communities of Cheltenham during the consultation on the JCS.

- 3.29** Scenario B provides 3,684 homes lower than the 100% demographic projections indicate. This reflects uncertainties around projections as set out in paragraph 3.6 of this report. This lower projection can be effectively monitored through the JCS plan period at key milestones and the strategy amended accordingly if population projections are not in alignment. Based upon the evidence currently available officers are of the view that Scenario B is defensible and offers a robust position for the Council.
- 3.30** Officers very much appreciate that if Scenario A was implemented then this would result in protection of the current green belt, a long standing ambition of the Council. However, the JCS needs to take a long term perspective; allocating the right level of development to meet requirements over a 20 year period and providing certainty both to those communities directly affected by the green belt designation and the development industry in identifying locations suitable and sustainable for the accommodation of the Borough's long term development needs. Scenario A would in theory deliver a 5 and 10 year supply of housing; but it would only do so because the total capacity has been capped at the level of urban capacity and windfalls within the last 10 years of the plan.
- 3.31** Notwithstanding concerns around the accuracy of population projections, Scenario A would only deliver 37% of the demographic, delivering around 220 new homes per year, significantly below the average house building level within Cheltenham Borough since mid 1991. It would provide 20,591 homes lower than the 100% demographic projection. A result of this will be the export of people (particularly those in the 25 – 59 age groups) out of Cheltenham as the number of households exceeds the level of housing available, exerting upward pressure on house prices and market rents and leading to lower levels of children and younger people within the population of Cheltenham. This would also occur in Scenarios B – D, but to a lesser extent.
- 3.32** Whilst affordable housing will be provided under Scenario A, it is anticipated that there will be considerable growth in the numbers of new households requiring affordable housing. Findings of the Gloucestershire Affordability Model indicate that under Scenario A Cheltenham would experience a 71% increase in affordable housing need. It's true to say that under all Scenarios affordable housing need grows and is not fully addressed, but this falls as the level of new strategic sites in addition to urban capacity is released. For example under Scenario B whilst there would still be an increase in need, this would have reduced to 45%, Scenario C 28% and Scenario D 25%.
- 3.33** A key issue for the consultation however is that whilst the JCS will make a step change in affordable housing provision, the number of affordable homes required will still far exceed the overall annual delivery rate – The JCS needs to address how this will be managed. A draft development management policy is included within the emerging JCS document relating to affordable housing (Proposed Policy B: Meeting affordable housing needs) and views will be sought through the consultation period on how innovative this policy can be whilst still enabling viable developments to be brought forward.
- 3.34** From an economic perspective Scenario A would not deliver new employment locations, whilst it is true that not all new employment uses will result in new space requirements, the JCS evidence base identifies a range of between 12 hectares and 23 hectares of new employment land over the JCS plan period for Cheltenham Borough. On the evidence currently available, together with negotiations on planning applications to date this cannot be delivered within the built up urban boundary of the Cheltenham.

3.35 It is the professional advice of officers that Scenario A is not a sound or robust scenario to progress at examination. This Scenario fails to respond effectively to the JCS evidence base including housing review and employment land requirements. Taking account of where we are in the JCS process, together with the evidence base currently available it is the professional advice of officers that further testing of Scenarios B – D is required, but that Scenario B appears best to meet the development needs of Cheltenham and the wider Joint Core Strategy area over the plan period.

3.36 ***Development management policies***

A number of development management policies have been drafted for consultation and illustrate how the vision and development strategy could be delivered. These policies would provide the strategic framework for more detailed local planning policies contained within future local plans of each Joint Core Strategy authority. The policies reflect the current emerging strategy that is being consulted upon and will be reviewed to take account of any changes to the strategy arising from this consultation.

3.37 At this stage draft policies are concerned with development strategy, settlement hierarchy, affordable housing, rural exception sites, green belt, flood risk and gypsy and traveller sites. At the next stage of consultation the strategic development management policies will also include additional policies including development phasing, infrastructure provision, delivering a continuous supply of housing, housing mix, employment, masterplanning and design.

4.0 **ALTERNATIVE OPTIONS CONSIDERED**

4.1 A number of options are included in the consultation document for public comment. The JCS evidence base has tested alternatives.

5.0 **CONSULTATION AND FEEDBACK**

5.1 A range of consultation has been undertaken to date and this is set out in appendix 2. Members have been engaged through member seminars, via the JCS Member Steering Group and regular monthly member updates circulated corporately.

5.2 The consultation document will be published on 13 December for a period of 9 weeks consultation. A detailed consultation plan is being worked on by officers; this will include press and radio coverage, publicity material distributed throughout the area, exhibitions and displays in main shopping centres and supermarkets as well as leisure centres, libraries and farmers markets. In addition there will be features in the newsletters and websites of the three councils. Meetings and workshops are being planned with town and parish councils, working with the Gloucestershire Rural Community Council. Officers are currently exploring the scope to engage with groups which are generally harder to reach or excluded from consultation processes such as ethnic and minority groups, and both the young and older age groups. As the strategy is looking at proposals that will affect homes and jobs over the next 20 years, officers are particularly keen to try to involve young people in the consultation.

5.3 Whilst the JCS needs to be a document that will stand up to the scrutiny of a public examination and must be prepared in line with statutory regulations, it is equally important that it can be understood by the local community so consultation and publicity material will be prepared in Plain English and try to avoid the use of planning jargon as far as possible.

6.0 **NEXT STEPS**

6.1 ***What happens next?***

Following consultation the three councils will carefully consider all representations received

and where appropriate seek to resolve any objections. This will then be used to inform the Preferred Option Document before the final Joint Core Strategy is submitted to the Secretary of State for independent examination.

6.2 The timetable for the production of this development plan document can be viewed on the dedicated Joint Core Strategy website at www.gct-Joint Core Strategy.org The timetable from this point onwards is as follows:

‘Developing the Preferred Option’ public consultation	December 2011- February 2012
Preferred Options consultation	Summer 2012
‘Pre-submission’ public consultation	Early Spring 2013
Submission of the Joint Core Strategy	Summer 2013
Examination	Autumn 2013
Adoption	January 2014

6.3 Should agreement by the 3 Councils be reached on the publication of the draft “Developing the Preferred Options Consultation Document” by the end of November 2011, then the report attached as appendix 1 to this report will be converted into a document suitable for public consultation. This will include any amendments arising from the report through the debate at the 3 Council meetings together with a set of key questions to help guide consultation. These key questions will be agreed with the JCS Member Steering Group.

Report author	Contact officer: Tracey Crews – Strategic Land Use Manager, tracey.crews@cheltenham.gov.uk 01242 264382
Appendices	<ol style="list-style-type: none"> 1. Developing the Preferred Options: Consultation Document 2. Response Report on Consultation Carried Out to Date (October 2011) <ol style="list-style-type: none"> 2.1. Appendix 1 of Response Report 3. Sustainability Appraisal <ol style="list-style-type: none"> 3.1. Appendix 1 of Sustainability Report 3.2. Appendix 2 of Sustainability Report 3.3. Appendix 3 of Sustainability Report 3.4. Appendix 4 of Sustainability Report 3.5. Appendix 5 of Sustainability Report
Background information	JCS evidence base www.gct-Joint Core Strategy.org

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Joint Core Strategy

Gloucester • Cheltenham • Tewkesbury

**Developing the Preferred Option
Consultation Document
December 2011**

Tewkesbury

Cheltenham

Gloucester

**Working beyond
boundaries
& shaping
our future**



**GLOUCESTER
CITY COUNCIL**



**CHEL TENHAM
BOROUGH COUNCIL**



**Tewkesbury
Borough Council**

FOREWORD

This Joint Core Strategy will establish how Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council will work collaboratively on a cross boundary basis to produce a long term strategic plan for the area up until 2031.

The scale and uniqueness of the Joint Core Strategy area presents the three councils with numerous challenges and requires a long term commitment, a sharing of resources and a political understanding if these challenges are to be met effectively. Whilst the three centres Gloucester, Cheltenham and Tewkesbury town each have their own distinctive character it is recognised that there is a strong functional and economic relationship between the three centres providing access to shops, facilities, open countryside, transport and infrastructure. The Joint Core Strategy is the document which will guide the enhancement of the area establishing how the three local authorities will respond to the pressures and challenges which the area faces ensuring that it is able to compete with other centres.

In response to the freedom afforded to local authorities to devise their own housing and employment targets the three councils have produced their own local growth projections to guide the development of the area. A considerable amount of time has been spent preparing this document and as part of this we have consulted with a wide range of stakeholders and organisations, reviewed existing evidence, commissioned new studies and consulted with local residents and businesses.

The Joint Core Strategy will establish a clear set of ambitions for the area focusing development at Gloucester, Cheltenham and Tewkesbury town. It also recognises that the rural settlements in the Joint Core Strategy area play a crucial part in the heritage and individuality of the area both at present and in the future.

There is a recognised need and an agreed political consensus to produce the Joint Core Strategy in guiding the development of the area up to 2031. We believe that the options presented in this document provide a clear approach as to how the Joint Core Strategy will manage the three competing pressures; economic, social and environmental in order to ensure that development in the area is sustainable for both present and future generations.

We would like to take this opportunity to thank you for your contribution to the development of the plan and encourage you to participate further so that you can continue to influence the decisions made for your area.

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INTRODUCTION

What is the Joint Core Strategy?

The Joint Core Strategy (JCS) is a joint development plan being prepared by Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council for the period 2011 to 2031. It will form part of the statutory development plan for each council and provide the strategic planning framework for each authority's future local plan. It will contain a number of strategic allocations and development management policies to guide future development in the JCS area.

Policies contained within the JCS will replace a number of development plan policies already contained within existing authority local plans and provide the structure for the preparation of more detailed future local plan allocations and policies by individual councils. These will be prepared either individually or in partnership between the JCS authorities. However, some existing local plan 'saved policies' will continue to be used until a new and complete suite of policies is finalised. A full list of saved and replaced policies will be set out within Local Development Schemes for each authority.



Diagram 1: Strategic Allocation/Development Management Policies

Why produce a Joint Core Strategy?

There is a functional relationship between the three authority areas which ignores their administrative boundaries. For instance; the three authorities make up a housing market area and an economic area (which also supports the wider Gloucestershire area), whilst communities choose to use each other's services such as shops, leisure and health facilities, amenities and countryside regardless of administrative boundaries that exist. It therefore makes sense to work together to plan for the whole area in a more coherent way.

What is the Developing the Preferred Option Consultation Document?

This document builds upon previous public consultations and sets out the vision for the JCS area to 2031 and a number of emerging options for how this can be achieved. Included within this document are the potential employment and housing requirements for the JCS area. A number of strategic allocations to meet development requirements for 2011 – 2021 are identified based on our assessment of consultation and evidence base work carried out to date. Options for broad locations to deliver development requirements post 2021 across the JCS area are also identified.

This document has been informed by a number of factors, including national planning policy, engagement with communities and stakeholders and an extensive evidence base.

In order to inform this stage of the development plan we have engaged with local communities and businesses, town and parish councils, national and local organisations, infrastructure providers and developers and agents.

The production of the Joint Core Strategy embodies continuous consultation however specific consultation events have also taken place including:

Issues and Key Questions consultation	November 2009 – February 2010
Parish Council events	February – March 2010
Stakeholder engagement	July 2010
Joint Core Strategy Part 1 online consultation	June 2010 – August 2010

The Issues and Key Questions Consultation, parish council events and stakeholder engagement events provided people with an opportunity to develop their understanding of the Joint Core Strategy and voice their concerns and aspirations for their area. The three events provided a summary of the key issues the area faces and helped to develop the vision for the area. In addition three draft ‘spatial options’ were discussed for how the JCS could deliver the emerging vision. These three ‘spatial options’ were based upon economic, social and environmental led approaches to policy development. An online consultation period was then held building upon the feedback received on the Issues and Key Questions consultation.

It is recognised that the views of local residents and interest groups are key to developing a plan which will meet their needs and aspirations. In addition it is also acknowledged that for the document to be found ‘sound’ it must satisfy a number of criteria. A substantial evidence base of both existing information and commissioned studies has been gathered. It is also a requirement that the document is taken through a sustainability appraisal process which considers the environmental, social and economic outputs of the plan and ensures that development meets the needs of both present and future

generations. An initial sustainability appraisal report has been published alongside this document, available to view on the Joint Core Strategy website at www.gct-jcs.org.

What happens next?

Following consultation the three councils will carefully consider all representations received and where appropriate seek to resolve any objections. This will then be used to inform the Preferred Option Document before the final Joint Core Strategy is submitted to the Secretary of State for independent examination.

The timetable for the production of this development plan document can be viewed on the dedicated Joint Core Strategy website at www.gct-jcs.org. The timetable from this point onwards is as follows:

'Developing the Preferred Option' public consultation	December 2011- February 2012
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How to get involved

The three Joint Core Strategy authorities would like to invite you to comment on the Developing the Preferred Option consultation document for a period of **approximately nine weeks** between **13th December 2011** and **5.00pm on 12th February 2012**.

Copies of this document are available at locations across the JCS area including libraries, community/resource centres and in the reception area of the local planning authorities' council offices. Details of these locations can be found on the Joint Core Strategy website. Specific public consultation events are also being held across the JCS area.

Comments on the Developing the Preferred Option Document are encouraged to be made online via the Joint Core Strategy website at www.gct-jcs.org. Alternatively comments can be submitted by email to info@gct-jcs.org, or in writing to:

Joint Core Strategy, Municipal Offices, Promenade, Cheltenham, Gloucestershire, GL50 9SA.

THE JOINT CORE STRATEGY AREA

All local authorities are statutorily required to prepare a development plan; the most important part of this plan is the core strategy which establishes the long term strategic direction for each area including identification of development requirements. Gloucester, Cheltenham and Tewkesbury councils have agreed to prepare one core strategy covering the entirety of the administrative areas of each of the authorities. Many of the characteristics of the area and the issues which it faces, such as flooding, outstanding landscape and the need to plan for sufficient development to provide jobs and housing, including affordable housing for future residents are common across the area. There are strong functional, economic, infrastructure, policy and cross boundary relationships which mean that working together on a Joint Core Strategy makes good planning sense. The Joint Core Strategy is based on collaborative research into the three authority areas' characteristics, relationships (with each other and adjoining areas), past trends and future predictions. This introduction provides a brief summary of the JCS area's communities, economy and environment in 2011, as informed by detailed evidence available to view at www.gct-jcs.org.

The Joint Core Strategy area includes more than 60 settlements and stretches from the Cotswold Hills to the Severn Vale. The M5 motorway corridor passes through the centre. Gloucester and Cheltenham are the main urban centres. The market towns of Tewkesbury and Winchcombe act as employment hubs and providers of services to rural areas. Gloucester and Cheltenham are separated by the existing Green belt, most of which lies in Tewkesbury Borough.

The rural landscape includes the Cotswold area of outstanding natural beauty (AONB), several sites of special scientific interest (SSSI), numerous nature and landscape conservation areas, woodlands and good quality agricultural land. Flood zones along the Rivers Severn and Avon and their tributaries influence much of the sub-region. A recent major flood event occurred in July 2007, which devastated local communities and isolated important infrastructure. The impact of this event and the lessons learnt are now guiding management of watercourses and floodplains and influencing the location of development with the introduction of innovative drainage systems.

Population and housing

In 2011, the JCS area was home to a total of 322,600¹ residents, with 120,500 (38%) in Gloucester city, 116,200 (36%) in Cheltenham borough, 17,500 (6%) in Tewkesbury town/Northway, and 63,800 (20%) in the wider Tewkesbury borough.

The overall trend for the JCS area, as a whole, is towards an ageing population although Gloucester city is expected to experience a significant rise in the young people and working age group.

In 2011, it is estimated that there are 140,500 households in the JCS area. In terms of new homes provided, 8,266 new homes have been delivered in the JCS area between April 2006 and April 2011, with Gloucester city the main provider with some 3,800 new homes. Tewkesbury borough has provided approximately 2,200 new homes and Cheltenham some 2,100 new homes. Average annual delivery

¹ Gloucestershire County Council estimates (2009)

rates (over the last 5 years) for Gloucester, Cheltenham and Tewkesbury borough are 770 dwellings, 430 dwellings and 440 dwellings respectively totalling 1,650 dwellings for the JCS area as a whole.

Housing need in both the urban and rural areas remains a pressing issue for the JCS authorities. The latest evidence on housing need estimates a requirement of some 2,050 new affordable homes every year with Cheltenham being the highest in housing need with a requirement of 913 new homes per annum. Gloucester is estimated to require 787 new homes per annum and Tewkesbury borough requires 355 new homes per annum. The figures for Tewkesbury borough indicate a very real need to increase the supply of rural affordable housing.

As can be seen from the above, housing need in the JCS area is higher than historic supply, particularly in Cheltenham where housing need is more than two times higher than actual supply of all new homes. Since April 2006, 2,015 affordable homes have been provided in the JCS area.

Economy, employment and skills

Gloucester and Cheltenham provided 136,000 jobs between them in 2009, which equates to some 44% of the county’s jobs, with Tewkesbury borough provided a further 44,000 jobs, 14% of the county’s jobs.

Employment in the JCS area 2005 to 2009

	2005	2006	2007	2008	2009
Gloucester	70,000	71,000	71,000	68,000	73,000
Cheltenham	64,000	61,000	61,000	63,000	63,000
Tewkesbury Borough	41,000	39,000	41,000	41,000	44,000

Table 1: JCS employment data 2005 to 2009

Source: Nomis www.nomisweb.co.uk (figures have been rounded)

Employment is dominated by public administration: education, health, distribution, hotel and restaurants, banking, finance and insurance sectors, as well as some manufacturing.

Despite the generally high calibre of schools, there are differences in skills and qualifications (and accordingly earnings) across the area. Despite this, the evidence indicates that there is a net outflow from the county of people between the ages of 15 and 29 years, which is weakening the potential of the local workforce and making it less attractive to business. In addition, there are high numbers of young people aged 16 to 18 years who are not in education, training or employment.

Unemployment figures have been rising in the county since May 2008 and the April 2009 level (12,200) represents a doubling of the long-term trend for the county, with widespread impacts on almost all sections of the local economy.

Retail provision varies between and within locations from high street chains to small independent shops. Since the 2007 recession, vacancy rates have increased in both larger and smaller centres.

Affluence and inequality

Whilst the Joint Core Strategy 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 areas in England, which suffer from low incomes, unemployment, poor health and housing, low educational attainment and crime and disorder.

There are also many highly affluent rural areas; particularly in the east of Tewkesbury borough. Notwithstanding this, many residents have no effective public transport access to essential services.

Transport and infrastructure

The JCS area is well served with rail, motorway and strategic road connections, and Gloucestershire Airport. These transport links connect the area with the rest of the UK, particularly the M5 motorway corridor and links to the West Midlands and southwards to the M4 motorway corridor.

Almost 90% of Gloucestershire residents work within the county. For the small percentage that travel out of the county to work, Bristol, South Gloucestershire and Oxfordshire are popular destinations. Gloucester and Cheltenham draw in significant commuters from within Gloucestershire.

While this level of inward commuting within Gloucestershire is good for the local economy it does place strain on the central areas in terms of traffic congestion and pollution. Whilst the major urban areas are compact and offer potential for improvements to local cycling and pedestrian links, maintaining and improving public transport links across the rural areas is more challenging. The rural areas have much higher levels of car dependency for access to services.

Initial assessment of existing infrastructure identifies that additional provision will need to be made for health, transport and education infrastructure to support any increase in housing.

OUR VISION

The vision has been informed by: the Sustainable Community Strategies for Gloucester, Cheltenham and Tewkesbury borough, the JCS Sustainability Appraisal, consultation responses and the JCS evidence base.

Our vision is to produce a strategy which fosters growth in the local economy and provides sufficient homes, including affordable homes, in sustainable locations, without increasing the risk of flooding, or harming high quality landscape, whilst maintaining and enhancing the separate vitality, identity and character of individual settlements.

By 2031, Gloucester city and Cheltenham and Tewkesbury boroughs will be vibrant and successful centres meeting the needs of business, communities and visitors. The surrounding countryside will continue to be protected and enhanced, whilst the rural economy and rural communities will thrive. The high quality landscape of the Cotswold AONB will continue to be protected.

The historic settings of the urban areas should be conserved and enhanced while offering improved and accessible housing, jobs, open spaces, shopping, leisure, healthcare and education/training opportunities. New housing within and adjacent to the urban centres would maximise opportunities for sustainability, and in rural communities, to meet the area's housing (and affordable housing) needs without compromising local distinctiveness.

The JCS area will support a dynamic low-carbon economy with a range of employment opportunities with well-balanced and diversified, high-value businesses, and will foster economic growth by having an adaptable and skilled workforce.

Within the JCS area travel and congestion will be improved by means of better links between transport hubs and the city and town centres, reduced through-traffic, improved traffic management, improved cycle and footpath networks through urban and rural areas, improved high speed road and rail links within the area and to London and by capitalising on the accessibility to the M5 motorway.

Development within Gloucester, Cheltenham and Tewkesbury borough will take account of the areas' environmental capacity and the causes and consequences of climate change, including a robust approach to reducing flood risk. Residents will have access to a network of green infrastructure; with the potential for a regional park to be situated between the main centres, based upon the River Severn tributaries.

What does this mean for Gloucester city and adjoining communities?

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 homes within central areas of the city to meet the needs of its naturally growing population and to encourage inward investment. The King's Quarter regeneration will have played a key role in increasing the vitality and

viability of the City Centre environment and shopping experience combined with improved pedestrian, cycle and public transport improvements. A vital and viable City Centre will have raised Gloucester's profile as a strong, well connected and resilient location to be proud to live and work in as the economic and administrative capital of the county.

New high-quality business parks will be developed to retain and attract investment, thereby supporting the economic resilience of Gloucester and the surrounding area.

New peripheral development could take place to the north and east of the city within Tewkesbury borough, at the adjoining settlements of Brockworth, Longford, Innsworth and Churchdown. This will need to reflect the individual identity of those existing settlements and seek to maintain their existing character and 'village' feel.

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.

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 this mean for Cheltenham and adjoining communities?

Cheltenham's development pattern is encompassed on all sides by the Cotswold 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 setting of Cheltenham is derived from its location at the edge of the escarpment, its regency heritage and garden landscape.

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, attractive green spaces and squares, whilst creating contemporary, new developments set within attractive new green spaces and based around the regency design principles and complimenting the existing character.

The town itself will continue to be a focal point for economic and cultural activity and, therefore, it is important that the borough makes provision for affordable homes, jobs, infrastructure and facilities over the next 20 years to support mixed and balanced communities and attract inward investment.

However, there is limited capacity to accommodate all of these competing development objectives within the urban area. Consequently, some peripheral development may be needed to achieve these. Recognising the environmental constraints of the Cotswold AONB, Cheltenham has a limited number of options for peripheral development to the east of the borough, with north-west and south Cheltenham considered the more sustainable locations for long-term development.

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.

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.

What does this mean for Tewkesbury town?

Tewkesbury is an attractive rural market town with significant heritage resulting in a high quality historic environment. It forms part of a wider urban area incorporating Northway and Ashchurch which have different characters.

Tewkesbury town is at the confluence of the River Severn and River Avon and these riversides whilst currently under-utilised, have great potential as a leisure destination and in attracting investment to the town. The Tewkesbury Town 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.

By 2031, Tewkesbury town centre will have strengthened its role as a desirable place to live and work, and will 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.

The Ministry of Defence base at Ashchurch is part of the wider Tewkesbury town area and could provide a brownfield redevelopment opportunity for mixed uses, should it close.

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.

What does this mean for rural Tewkesbury borough?

The character of the rural area will be protected and enhanced. Opportunities for farm diversification for employment or rural tourism could further support the rural economy and will be encouraged.

All development in the borough will recognise the importance and prevalence of flooding issues in the borough, reducing the regularity and severity of such risks as far as is practicably possible.

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.

Public transport will be improved, particularly the access between the larger rural settlements and the main urban areas. Notwithstanding this, the ability to serve the entire rural hinterland is limited and the importance of the car will continue.

By 2031, the rural areas will be prosperous and playing their part in the JCS economy. 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.

STRATEGIC OBJECTIVES

The following strategic objectives have been identified in order to achieve the vision, delivering change through the identification of suitable opportunities and enabling partners and stakeholders to deliver social, environmental and economic priorities. These objectives are inter-related and should be considered together in the policy-making process.

- **Address the causes and consequences of climate change**
- **Manage and reduce flood risk**
- **Allocate strategic development in support of sustainable urban and rural communities and the conservation of strategic open space**
- **Conserve and improve the built environment**
- **Conserve and improve the natural environment**
- **Foster economic growth**
- **Provide for local housing need**
- **Address social inequality, inclusivity and provide for healthier and safer communities**
- **Improve skills and educational attainment**
- **Increase access to jobs/services via sustainable transport modes**

Address the causes and consequences of climate change

- Promote new opportunities for high performance buildings, local low carbon buildings and decentralised energy generation
- Build on existing high levels of short distance commuting
- Reduce the need to travel by maximising the provision of sustainable travel, promoting zero car use and supporting initiatives such as car clubs
- Support renewable and low-carbon developments
- Promote food security by protecting where possible high-grade agricultural land and allotments
- Ensure new development maximises opportunities for environmental enhancements

Manage and reduce flood risk

- Ensure development does not exacerbate the segregation of communities and that infrastructure is adequately protected from the threat of flooding
- Maximise the opportunities to use land for active flood plain and protect and enhance existing flood defences
- Reduce flood risk to and from new development through location, layout and design, incorporating appropriate sustainable drainage systems (SuDS)
- Use opportunities offered by new development to reduce the causes and impacts of flooding
- Ensure development does not reduce the quality of surface and groundwater and supports rainwater harvesting where possible

Allocate strategic development in support of sustainable urban and rural communities and the conservation of strategic open space

- Maximise opportunities for development within existing urban areas with a phased approach for the development of peripheral sites
- Allocate development with reference to a defined settlement hierarchy which reflects the focus on urban areas and accessibility of settlements
- Make full, efficient and sympathetic use of previously developed land
- Re-use existing buildings where possible and sustainable
- Consolidate development in and adjacent to urban areas
- Recognise the role private gardens and incidental green space make to the strategic green space network

Conserve and improve the built environment

- Apply urban design principles to create a sense of place in new development
- Maximise the efficient use of previously used land
- Ensure urban regeneration is the priority for Gloucester, Cheltenham and Tewkesbury town, particularly to secure the vitality and viability of town centres
- Prioritise and protect the delivery of key sites within Gloucester of Kings Quarter, Greater Greyfriars, railway corridor, Gloucester docks and Greater Blackfriars
- Prioritise and protect the delivery of North Place, Royal Well, Coronation Square and other key regeneration sites in Cheltenham
- Prioritise and protect the delivery of key sites identified through Tewkesbury Town Centre Master Plan and under utilised urban land, including DSDC Ashchurch
- Conserve and improve the wealth of existing historic and architecturally important buildings, streets, waterways and spaces
- Ensure new development makes a positive contribution to the local environment, economy and community

Conserve and improve the natural environment

- Conserve, manage and enhance the area's unique natural environment and great biodiversity, including its waterways, SSSIs, the Cotswold AONB, areas of landscape and biodiversity importance
- Adopt a co-ordinated, partnership approach to creating and managing all green infrastructure including the 'greening' of the urban environment via tree planting
- Promote and capitalise on the area's environmental assets as both tourism opportunities and opportunities to increase social wellbeing

Foster economic growth

- To support the Local Enterprise Partnership (LEP), the JCS needs to identify and deliver a supply of employment land within central areas and on the periphery of the urban areas and to improve the economic resilience of the JCS area

All sectors

- Protect existing employment areas from inappropriate development for other uses.
- Direct employment development to sustainable locations
- Deliver key employment locations particularly those identified by GHURC, Cheltenham Development Task Force and the Tewkesbury Town Centre Masterplan
- Recognise the role of non- B class employment in the provision of future employment including tourism, retail and leisure opportunities
- Provide for rural employment needs through support for agriculture, farm diversification, development of small rural business units and conversion of existing buildings for rural business use
- Maximise and capitalise on community identity, image, local context, historic environment and culture
- Promote the low carbon economy

Retail

- Promote a complementary retail offer across Gloucester, Cheltenham, Tewkesbury and the market towns, to more effectively compete with larger centres
- Promote a “city/town centre first” approach, in turn providing greater support for the redevelopment of key urban retail sites
- Support local centres across the JCS area and village shops serving the rural community

Tourism

- Develop the area’s role as a destination within the South West
- Support the continued regeneration of Gloucester docks, Kings Quarter and Blackfriars plus public realm and other town centre improvements in Cheltenham and Tewkesbury
- Encourage and support hotel provision, high quality venues, museums, galleries and sports facilities
- Promote the concept of a regional park for the River Severn and washlands

Provide sufficient 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
- Provide housing on suitable deliverable sites of the right size, type and tenure in sustainable locations that provide good access to jobs and services and protect the quality of the environment

- Ensure all new housing developments contribute to the creation of mixed, sustainable communities
- Ensure a balance is achieved between new housing development and employment provision.
- Ensure adequate provision of associated social and physical infrastructure
- Deliver all new housing to 'good' or 'very good' Building for Life standards and to the Code for Sustainable Homes as a minimum
- Meet the needs of all age groups and communities, including provision for gypsies, travellers and travelling showpeople

Address social inequality and inclusivity and provide for healthier and safer communities

- Create stronger communities by planning to reduce inequality and social exclusion, and to increase social wellbeing and access to jobs and services
- Target support for the most deprived wards
- Plan to meet the needs of an ageing population, and those of other vulnerable groups including young disabled people
- Ensure that new communities are integrated with existing communities
- Encourage healthy lifestyles and a well society through access to key community facilities and services, open spaces and cycle/foot paths

Improve skills and educational attainment

- Build on the existing high quality of education and training in the area by facilitating high quality and accessible provision of such services in new and existing developments
- Foster the environment for entrepreneurship, business start-ups and sustainability, high growth rates and local business support

Increase access to jobs/services (via sustainable transport modes)

- Provide safe walking or cycling routes to a wide range of shopping, employment and community facilities as a key element of a sustainable, low-carbon future
- Provide innovative transport solutions through planning and urban design to increase use of public transport, walking, cycling and powered two-wheelers – and thereby reduce private car use (reducing congestion and increasing safety and quality of life)
- Improve green infrastructure within urban and rural areas to provide movement corridors and better permeability
- Provide for good access to the countryside and all open spaces through the retention and development of a comprehensive green infrastructure network
- Improve access to services in rural and urban areas through new development, improved transport links and better relationships between settlements

DEVELOPING THE PREFERRED OPTION

As set out at the beginning of this document, the JCS is a joint development plan being prepared for the three authorities of Gloucester City, Cheltenham and Tewkesbury Borough Councils. It sets the overarching strategy for development within the area up to 2031. This section sets out the manner in which the preferred option is being developed. Further information and evidence is available on the JCS website.

What scale of development is required?

The government has set out that with the proposed revocation of regional housing and employment targets it is now the responsibility of local planning authorities to establish their own housing and employment requirements based upon locally derived evidence.

For the JCS authorities, the primary evidence on the need for new homes is found within the local population and demographic projections published by Gloucestershire County Council. This provides the authorities with a good basis for understanding how population levels may change over the plan period. In planning for new homes it is also important to make sure that there are sufficient opportunities for creating new jobs for people living in the Gloucestershire area. For this the authorities are using the most up-to-date information on local and national economic job projections as set out below.

How many homes need to be provided for?

The most recent local projections provided by Gloucestershire County Council² have forecast that the JCS area could have a population of 367,800 people by 2031. This means a rise of approximately 45,200 residents compared to an estimated 322,600 people living in the area in 2011. The housing needs assessment for the area identifies an ongoing need for significant affordable housing³. Using this information it is estimated that the number of new homes required in the JCS area is 36,850 new homes, which means that 1,840 new homes would need to be provided every year. This figure compares with an annual average for the last five years of 1,650 new homes, whilst between 2006 and 2008 the amount of new homes each year exceeded levels of 2,000.

The Gloucestershire affordability model (GAM) was commissioned by the six Gloucestershire district authorities and the county council as a means of informing the decision making process in terms of the levels of housing which may be required within Gloucestershire for each of the authorities' development plans. The model uses demographic and economic projections to help make forecasts as to how the housing market may look over the plan period and therefore helps to address issues such as affordability and housing need.

² Projections taken from Gloucestershire County Council Housing Trend Analysis Report May 2011 available at [http://www.gct-jcs.org/Documents/EvidenceBase/GloucestershireHousingTrendAnalysisPopulationandHouseholdProjections\(May2011\).pdf](http://www.gct-jcs.org/Documents/EvidenceBase/GloucestershireHousingTrendAnalysisPopulationandHouseholdProjections(May2011).pdf)

³ Gloucestershire Housing Needs Assessment November 2009
<http://www.gloucestershire.gov.uk/inform/index.cfm?articleid=99610>

It is clear from the consultation to date, that many people have concerns about the level of housing growth and the implications for greenfield sites and existing communities. Therefore, in developing this strategy, consideration has been given to meeting housing need within existing urban areas and through existing planning permissions and through the provision of 2,400 dwellings in the rural parts of Tewkesbury borough only. It is estimated that this would provide approximately 16,200 homes. The implications of this are set out in Scenario A later in this document.

While the estimated number of new homes needed every year in the JCS area is 1,840, the JCS authorities are providing the opportunity for people to comment on whether this is the appropriate level to plan for, or whether the authorities should plan for a higher or lower number of homes. In addition to scenario A above, the following range of +/- 10% are being consulted upon:

Scenario	Total Homes	Homes per year	Sensitivity range
B	33,200	1,660	-10% (similar to annual housing delivery 2006 -2011)
C	36,850	1,840	Current local projection of housing need
D	40,500	2,025	+10% (similar to annual housing delivery 2006 – 2008)

Table 2: Housing requirements

This range of housing levels is included within a set of scenarios. Following this consultation the JCS authorities will consider the final number of new homes to be delivered in the JCS area. This will be set out in the next JCS publication in summer 2012. These scenarios will undergo further testing through the Gloucestershire affordability model, the sustainability appraisal process and assessment against other JCS evidence base on housing need and land availability.

The sustainability appraisal (SA) assesses the plan against a number of key environmental, economic, and social criteria to establish the effects of its implementation to maximise its benefits and mitigate any downsides.

How many jobs should we provide for?

Previous consultation has established the importance of creating jobs and improving the competitiveness of the area. This is reflected in the vision. It is important that the JCS area plans appropriately for the number of jobs needed over the next twenty years.

This reflects the Gloucestershire LEP ambition, is to drive economic growth, improve productivity through increasing gross value added (GVA) and encouraging business creation. They will have a key role to play in supporting the implementation of the JCS seizing commercial opportunities while we transit to a low carbon economy, balancing economic activity across a broad structural base.

At the present time of continued economic uncertainty there is no clear evidence on the likely speed of full economic recovery or whether the country might face a further recession. However the cyclical nature of the UK economy means that a future upturn is expected, long term economic forecasting that evens out any periods of growth or decline and consequently has a greater reliability than short term forecasting. The JCS authorities are therefore planning to increase the long term economic competitiveness of the JCS area as part of this strategy.

To estimate the number of jobs to plan for, the JCS authorities have used the latest economic job forecasts provided in their employment land requirements evidence. This evidence sets out that there are an estimated 177,000 jobs in the JCS area at present. There are a range of forecasts for the JCS area which suggest an increase of between 20,000 to 35,000 new jobs over the period to 2031.

Not all of these jobs, however, will require additional employment land and it is important to acknowledge this in identifying areas for new employment land provision. Using the JCS economic evidence base it is estimated that the range of additional employment land would be between 34 and 62 hectares. Further work will be done to refine these requirements but at this stage a mid point of 46 hectares is included in the strategy.

This however, represents a minimum level of jobs expected derived from baseline economic projections. Further work is required to be undertaken in developing the preferred option to identify the overall level of jobs needed to support the population demands associated with the housing scenarios set out later in this document, and the need to increase the economic competitiveness of the JCS area. This 46 hectares should therefore be considered as a minimum requirement and the JCS authorities are consulting on whether the requirement should be higher or lower than this as well as to where this should be distributed, taking into account the need to increase the quality of employment land on offer.

The final employment land requirement will be set out in the Preferred Options document in 2012 which will be informed by the preferred level of new homes requirement and further analysis using the Gloucestershire affordability model.

Linked with employment is retail provision which is both a source of jobs and a key service function for the designated centres within the JCS area. A level of retail provision for the JCS plan period is currently

being established through a joint retail study and this will inform the next phase of consultation in the Preferred Options document in 2012.

What is the approach for accommodating the levels of development?

In order to develop a strategy for the JCS area, the authorities consulted on 3 potential options in 2010 which included a number of ways the JCS strategy could be taken forward. These options comprised:

- a strategy that places a higher reliance upon economic resilience.
- a strategy that places a higher reliance upon resilience to climate change
- a strategy that places a higher reliance upon stronger communities.

Following consultation at the stakeholder events, none of the options as presented were considered to be the most appropriate way forward in isolation and one which incorporated important aspects from each of the spatial options was favoured, but with particular focus on the economy. This has led to the JCS strategy set out in the following section which includes an emphasis upon increasing the economic competitiveness of the JCS area.

Following the above consultation and further sustainability work, the approach put forward in this document is based upon one that focuses development upon the principal settlements of Gloucester and Cheltenham close to existing areas of population and jobs to maximize existing opportunities. Where the urban areas do not have the capacity to accommodate all the development requirements⁴ the next most sustainable locations are on the edge of the urban areas, again where development is close to existing town centres, areas of employment and essential to services and facilities.

Beyond this, development should be directed to Tewkesbury town in accordance with its role as a main market town, and again where development cannot be accommodated within the urban area, the next most sustainable locations on the edge of the town should be investigated. While the main towns should be the focus for new development, the rural areas also play an important role in providing new homes and services and can accommodate smaller amounts of development proportional to their size and function. A settlement hierarchy has been prepared on this basis.

Other reasonable alternatives considered:

During the earlier consultation, the strategy option for climate change considered the possibility of a new settlement rather than peripheral development around the larger urban areas. Whilst this could possibly reduce the pressures on the land around existing urban areas and existing facilities within these areas, the level of infrastructure required to support a new settlement is so significant that this is not a viable option. However, improved and new facilities can be provided more readily for the existing urban areas and any new communities through peripheral development. Previous studies have also shown this option not to be favoured.

⁴ Refer to Strategic Housing Land Availability Assessments in the JCS evidence base

Under the stronger communities strategy option consideration was given to greater dispersal to rural settlements. It was considered that infrastructure and sustainability factors meant that this was not a viable option.

Identification of locations in accordance with the strategic approach of focusing on the main urban areas.

On the basis that the approach put forward is to focus development within and on the edge of existing urban areas rather than distributing more development across the rural areas, work has been undertaken to estimate the capacity of each urban area. This has determined how much development can be realistically accommodated within the urban areas including brownfield sites and therefore what level of development needs to be found on the edge of each.

Existing Capacity

The capacity of the urban areas and existing planning permissions/Local Plan commitments provides for 13,800 new homes over the plan period. For employment, work is currently still progressing to measure the capacity of the urban areas to accommodate employment land. The JCS authorities are critically examining the portfolios of employment land within the urban areas against the requirements to provide a range of employment land including new high-quality employment sites that are attractive to investors. This work will inform the preferred options document in Summer 2012.

It is clear from the work undertaken on the existing capacity that this cannot provide for the estimated requirements set out in the previous section. On this basis, an assessment of the constraints and opportunities in the JCS area was undertaken to identify the most appropriate locations for development on the edge of the urban areas.

Identifying locations on the edge of the urban areas

In order to identify and assess the options for development on the edge of urban areas a study was undertaken referred to as the 'Broad Locations Assessment'. This process involved creating segments around the urban area which could be assessed in terms of constraints and suitability for development. The principal environmental constraints across the area are the locations at risk of flooding and the Area of Outstanding Natural Beauty (AONB). While AONB presents a strong environmental constraint, flood risk is of paramount importance and locations should only be identified in these locations following a sequential test which sets out that there are no other preferable locations. On the basis of these two constraints a limited number of opportunities for development exist on the edge of the urban areas.

The urban areas of Gloucester and Cheltenham are separated by the Green belt, which has the prime purpose of preventing coalescence of these two locations. A Green belt Review has been undertaken to assist the authorities in identifying where areas currently contribute to Green belt functions and where areas could accommodate new development. Given the exceptional circumstances and need to accommodate additional homes and employment in the JCS area, further work on the Green belt will be required to inform preparation of the preferred option.

Following a review of the environmental constraints and opportunities provided by locations surrounding the main urban areas, including sites outside of the JCS area’s administrative boundary to the north of Tewkesbury town (in Wychavon district, South Worcestershire) and south of Gloucester city (in Stroud district) the most sustainable locations to deliver the JCS vision have been identified for potential development in accordance with the preferred development strategy below.

Delivering the strategy

The evidence illustrates that there is a need to deliver new homes, and jobs across the JCS area, particularly affordable new homes against the expected levels of population growth. In order to meet the housing supply requirements a number of sites have been identified for the first part of the plan period (2011 – 2021). However, there is a shortfall in the second part of the plan period (2021 -2031) that also needs to be addressed. The JCS authorities are therefore proposing that the JCS strategy is delivered in two phases:

- Phase 1 for the period 2011 to 2021 to be delivered through strategic allocations⁵ in the JCS and individual local authority future local plan allocations
- Phase 2 for the period 2021 to 2031 to be delivered through strategic broad locations⁶ and housing delivery from strategic allocations continuing on from phase 1.

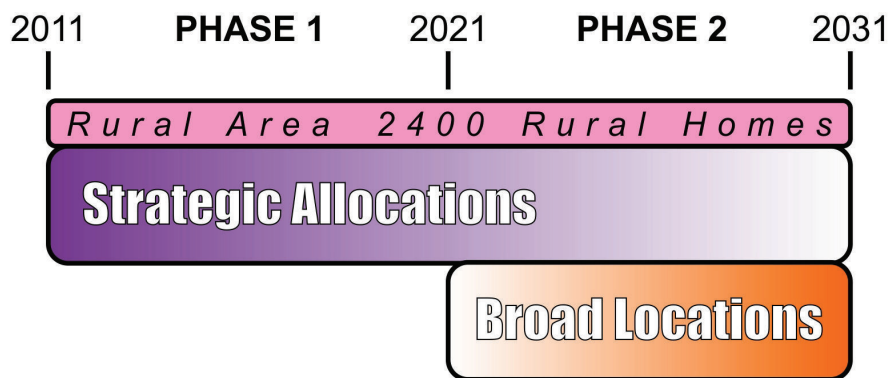


Diagram 2: JCS Phases

⁵ Strategic allocations are significant scale development allocations which are integral to the delivery of the plan.

⁶ Strategic broad locations are broad directions for potential longer term development.

2011 – 2021 phase 1.

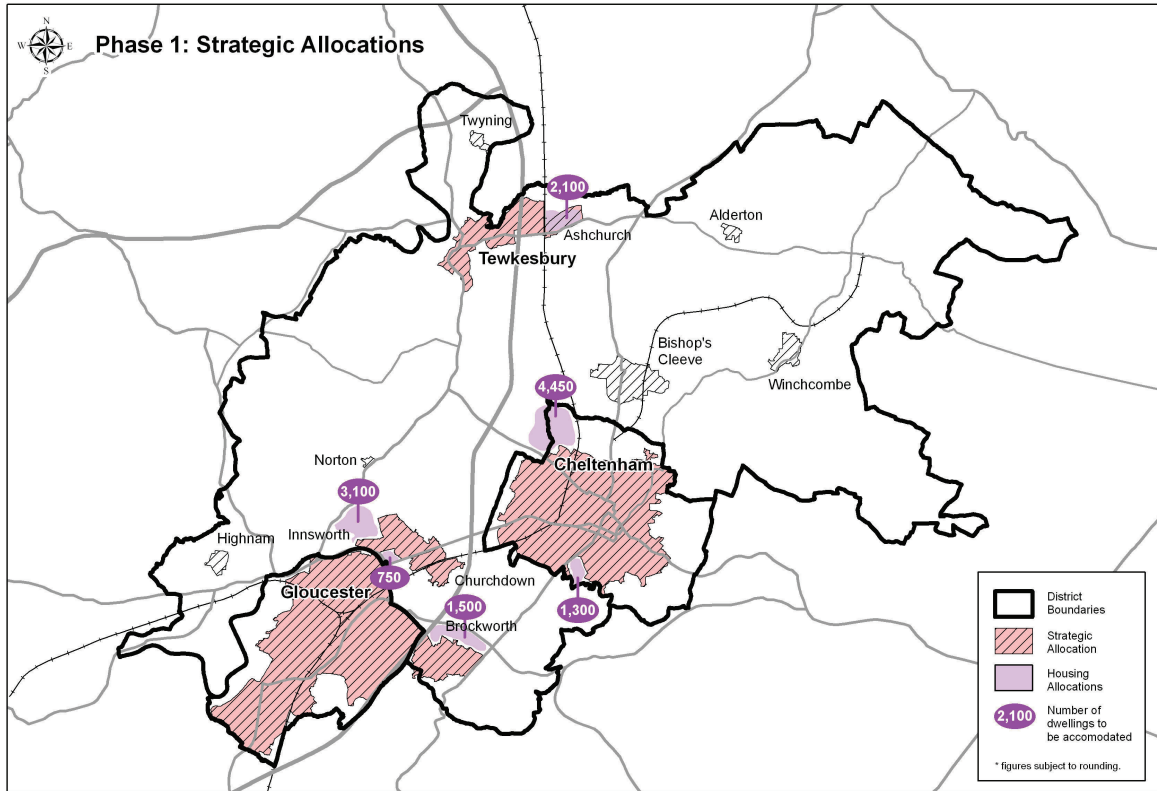
The map below details the strategic allocations during the first ten year period of the plan for the urban areas: Gloucester, Cheltenham and Tewkesbury borough.

Given the need to deliver an ongoing supply of new homes, the JCS authorities have set out a strategy in this document that identifies a number of preferred sites that, along with the urban areas and a proportion (2,400 dwellings) in the rural areas, can deliver 29,500 new homes starting in the first phase of the development plan. This would provide the authorities, individually and jointly with an interim 10 year housing land supply and would make a significant contribution towards meeting housing land supply requirements post 2021.

The 29,500 figure includes existing planning permissions: sites identified as likely to come forward for housing within the existing urban areas: a number of peripheral developments and a figure of 2,400 new homes for the rural area.

These locations have been identified as the most sustainable and suitable locations for development as part of the first phase of the plan and are set out in each of the following scenarios in this section. These have the capacity and potential to deliver new homes and employment in accordance with the development strategy and vision set out in this document. These have been tested with the development industry to ensure that the delivery of this amount of new housing and at these locations is viable.

Although the exact distribution of the 2,400 new homes for the rural area has not been identified by the JCS, a settlement audit has been carried out that identifies those settlements which are most sustainable and may be capable of accommodating further development. We are also seeking views from the public on which settlements would be suitable and whether there is a desire for this level of housing.



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Map 1: Phase 1 Strategic Allocations

Joint Core Strategy Strategic Allocations Housing and Employment Numbers

		Homes (No.)	Employment (ha)
Gloucester wider area	Existing planning permissions on the edge of the city	1,900	46
	Gloucester city local plan allocations and planning commitments	6,500	
	Innsworth JCS strategic allocation	3,100	
	Brockworth JCS strategic allocation	1,500	
	Churchdown JCS south strategic allocation	750	
Total Gloucester wider area		13,750	
Cheltenham wider area	Existing planning permissions on the edge of the town	600	
	Cheltenham town local plan allocations and planning commitments	3,700	
	North west Cheltenham JCS strategic allocation (Cheltenham & Tewkesbury	4,450	

	borough)	
	South Cheltenham JCS strategic allocation	1,300
Total Cheltenham wider area		10,050
Tewkesbury town wider area	Existing planning permissions in Tewkesbury borough outside of wider policy areas	630
	Tewkesbury borough local plan Allocations	500
	Ashchurch JCS Strategic allocation	2,100
Rural areas		2,400
Total Tewkesbury borough		5,630
JCS Total		29,430
Deficit against scenario B	Requirement 33,200	3,700*
Deficit against scenario C	Requirement 36,850	7,400*
Deficit against scenario D	Requirement 40,500	11,000*

Table 3: Strategic allocations: Housing and employment numbers

2021 – 2031 phase 2.

Whilst these sites would be able to deliver new homes and employment in the first phase of the plan period, they are not themselves sufficient to deliver the full requirement for any of the three housing options presented for consultation and a shortfall exists for each that needs to be identified in the eventual preferred option published in 2012. The shortfall is illustrated below.

Total Homes	Range	Strategic sites and allocations	Approximate shortfall to be found
33,200	-10%	29,500	3,700
36,850	Current local projection of housing need	29,500	7,350
40,500	+10%	29,500	11,000

Table 4: Housing shortfall

This additional development will need to be provided in phase 2 of the plan and the authorities are seeking views on where this should be. The locations that have the potential to accommodate additional development in accordance with the Vision and development strategy of the JCS are set out in the broad locations section of this document, and views are sought on the appropriateness of these.

Upon identification of the most sustainable locations to accommodate further development in phase 2 of the plan, a final housing requirement will be established for each authority in the Preferred Options Document in 2012. The following sections look in more detail at phases 1 and 2.

PHASE 1: STRATEGIC ALLOCATIONS

Development scenarios questions

What amount of new housing and employment land should be provided?

The previous section has set out a range of housing requirements from 33,200 to 40,500 new homes along with a range of employment land requirements. The JCS authorities are seeking your views on what level of housing and employment land should be provided in the JCS area over the plan period.

In order to provide information on the benefits and impacts of providing a range of housing requirements, four scenarios have been prepared to assess the implications of different levels of development. Scenario A identifies the impacts and benefits of not providing any development on the edge of the urban areas and relying upon existing planning permissions and urban sites only but with an additional rural provision for 2,400 new homes. In addition to the provision identified in Scenario A, Scenario B, C and D contain the same strategic site allocations to meet housing requirements for the first ten years of the plan. These Scenarios provide for different levels of housing as set out in Table 2 on Page 20.

Four assessments follow which summarise the impacts and opportunities provided by the four scenarios. These summarise information from the Gloucestershire Affordability Model, and take into account the Sustainability Appraisal work in considering how each scenario performs against the strategic objectives of the JCS.

SCENARIO A

SCENARIO A DELIVERING ONLY EXISTING URBAN AND RURAL CAPACITY (INCLUDING EXISTING PLANNING PERMISSIONS AND ALLOCATIONS) WITH NEW GREENFIELD EXTENSIONS TO THE URBAN AREAS

This scenario is based upon delivering development over the plan period but only within the built up areas of Gloucester, Cheltenham and Tewkesbury together with some development in rural villages. It relies solely on the capacity of the urban areas to deliver new homes based upon sites that already have planning permission, existing allocated sites and sites identified in the urban areas that are considered deliverable following an assessment of their suitability.

The emphasis of this scenario is to provide only new homes in the urban area and not bring forward new greenfield sites on the edge of the urban areas for development, including Green Belt land. This scenario would deliver 16,200 new homes over the plan period.

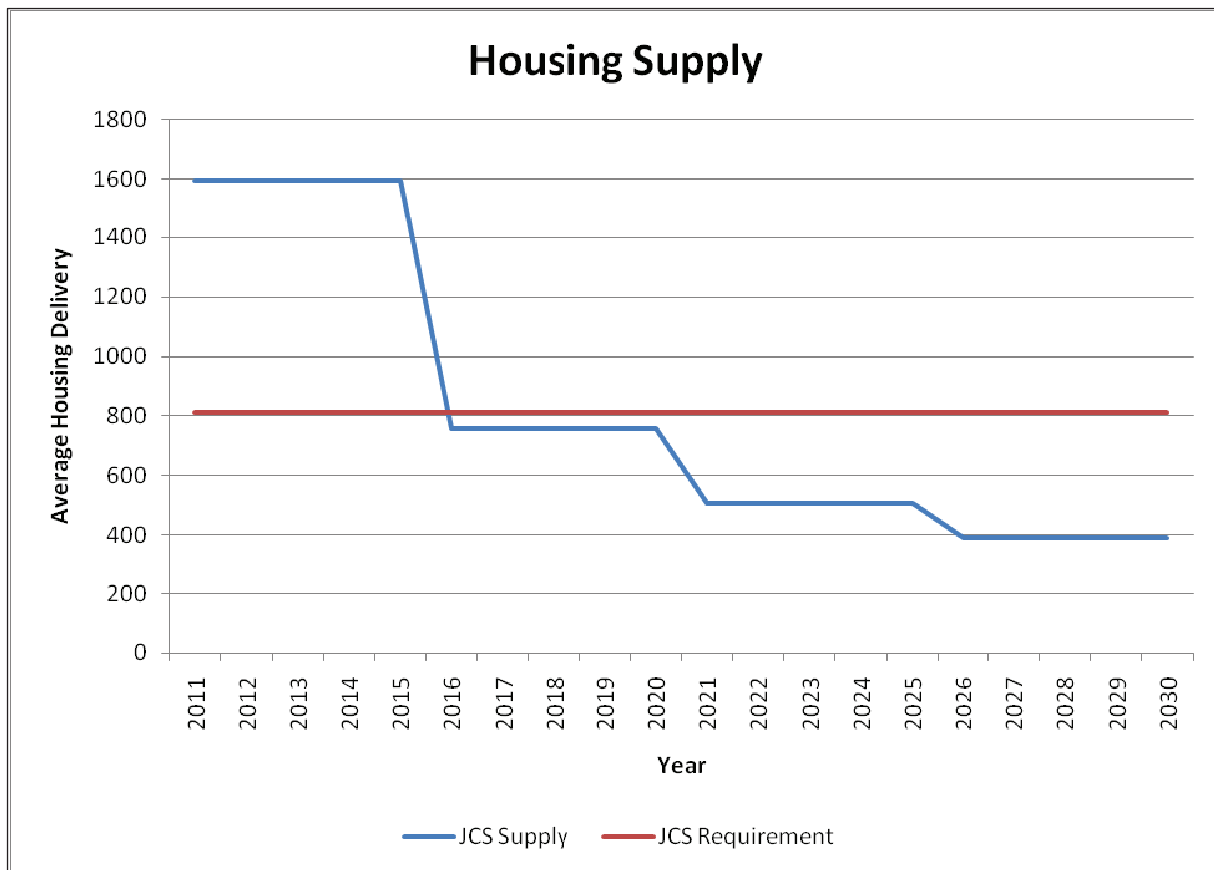
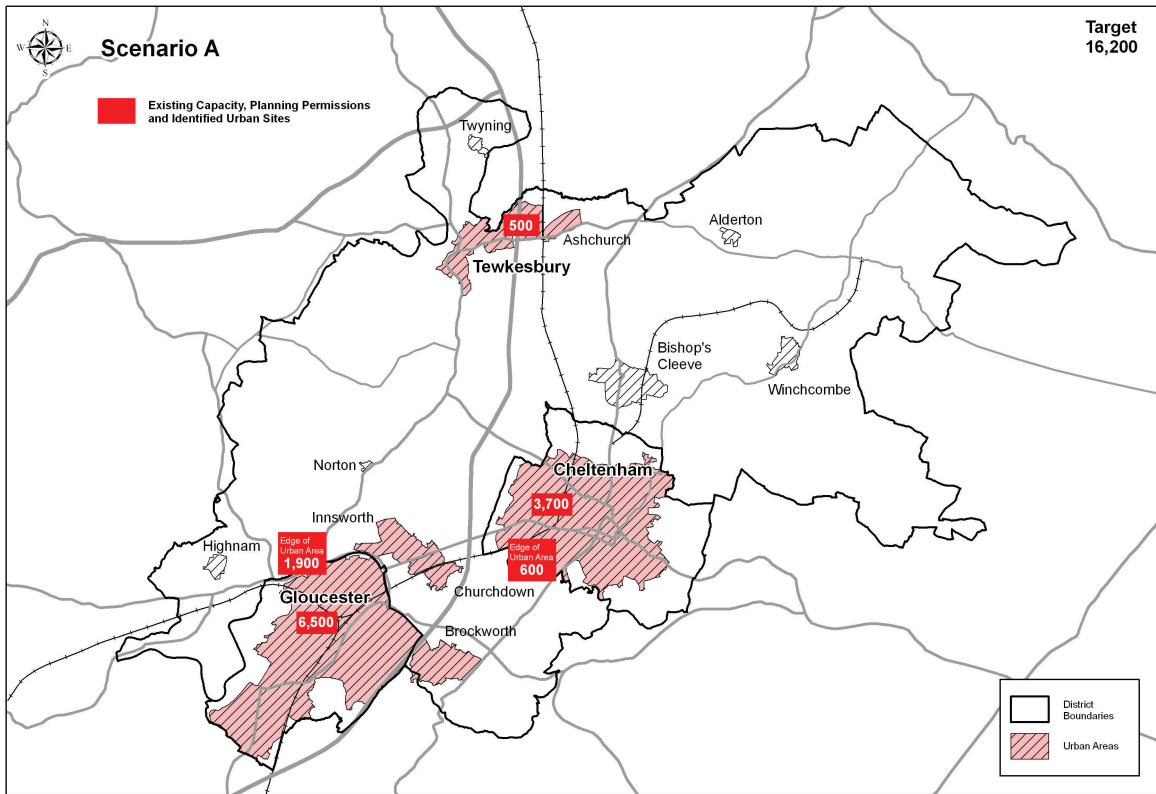


Diagram 3: Scenario A housing supply



Map 2: Strategic allocations scenario A

Implications identified by Gloucestershire Affordability Model

This scenario would provide a total of 16,200 new homes across the JCS area in association with at least 46ha of employment land. The impacts of this option are particularly acute in that the housing market in the JCS area might fail and the authorities could experience people leaving the JCS area due to the lack of new homes and the ability to find jobs and better economic conditions elsewhere. The housing market could suffer in that i. Overcrowding might increase, ii. There would be a significant lack of choice of properties, iii. In that people would be priced out of the housing market, and iv. The need for affordable homes could rise.

Typically those leaving the area are predicted to be aged 25 to 59 which comprises the main proportion of the workforce. The effects of this scenario are particularly strong in Cheltenham where the loss of people in this age group will be experienced early in the plan period. Tewkesbury and Gloucester are also affected by this loss of this section of the population. In Gloucester the severity of the decline in the latter parts of the plan period is stronger given the high level of young people reaching a point at which they wish to access the property market and not being able to do so.

Those people that stay in the JCS area are predominantly over 60, including the less mobile ageing proportion of the population. As a whole, the area would see a rise of 84% of people aged 60 years or older. This would place a significant requirement for an increased proportion of new homes to be specialist care or sheltered accommodation.

With a significant out migration of people from the JCS area in the main working age proportion of the population, in addition to virtually no rise in the number of children due to younger families moving away, the impacts on the ability of the JCS area to compete economically are seriously undermined.

JCS Objective		Commentary
1. Address the causes and consequences of climate change	AMBER	This scenario would have advantages in not building upon new Greenfield land and restricting the amount of land lost to development but could result in a significant loss of population of the working age group. This would increase commuting and congestion.
2. Manage and reduce flood risk	AMBER	This scenario would only develop land within the existing urban areas over Greenfield sites. However with an emphasis of maximising development in the urban areas, there may be pressure to provide additional housing as part of exception tests in urban areas of known flooding.
3. Allocate strategic development in support of sustainable urban and rural communities and the conservation of strategic open space	RED	This scenario does not allocate strategic development.
4. Conserve the built environment	RED	With pressures to deliver in urban area, all available space will need to be maximized. This would lead to higher density development at levels which will not be acceptable, nor attractive to the market. It is therefore highly unlikely that high density development will come forward.
5. Conserve and improve the natural environment	GREEN	This scenario would only develop land within the existing urban areas over Greenfield sites.
6. Foster economic growth	RED	This option results in the outmigration of the key working age group out of the JCS area with 83% of growth being people of 60+. The workforce will be ageing and no limited workers will be available. Land for employment uses will also be limited and under pressure for uses such as housing.
7. Provide for sufficient homes	RED	In this scenario people move away from the area due to overcrowding, lack of affordability, insufficient homes and better economic prospects elsewhere. This results in issues of affordability and rising annual housing need means this scenario does not meet need for new homes.
8. Address social inequality, inclusivity and community health/safety	RED	This scenario could see a rise in overcrowding and unsuitable housing. It will not deliver a range of housing types to meet the requirements of the JCS population
9. Improve skills and educational attainment	RED	There is an outmigration of the skilled workforce and along with it in the later periods of the plan a decline in young people. In addition to this people educated and trained here will not be able to access the

JCS Objective		Commentary
		housing market and will need to either commute or find employment elsewhere.
10. Increase access to jobs/services (via sustainable transport modes)	AMBER	This focus on accommodating development within the urban areas but an increase in commuting from outside the JCS area is likely.
<i>Table 5: Will Scenario A deliver the JCS strategic objectives?</i>		

SCENARIO B

SCENARIO B: PROVIDING NEW HOMES FOR APPROXIMATELY 10% LESS THAN THE ESTIMATED HOUSING REQUIREMENT THROUGH SITE ALLOCATIONS (AND BROAD LOCATIONS).

REQUIREMENT: 33,200 new dwellings and min point of 46ha employment land

DEFICIT TO BE FOUND: 3,700 Dwellings

This scenario seeks to maximise the delivery of sites within the urban areas and provide strategic allocations on the edge of the urban areas in accordance with the Development Strategy for the JCS. The overall requirement for this scenario is 33,200 new dwellings. Given that the urban areas, strategic sites and the rural area can provide for 29,500 new homes, the deficit to be found within Broad Locations is approximately 3,700 dwellings.

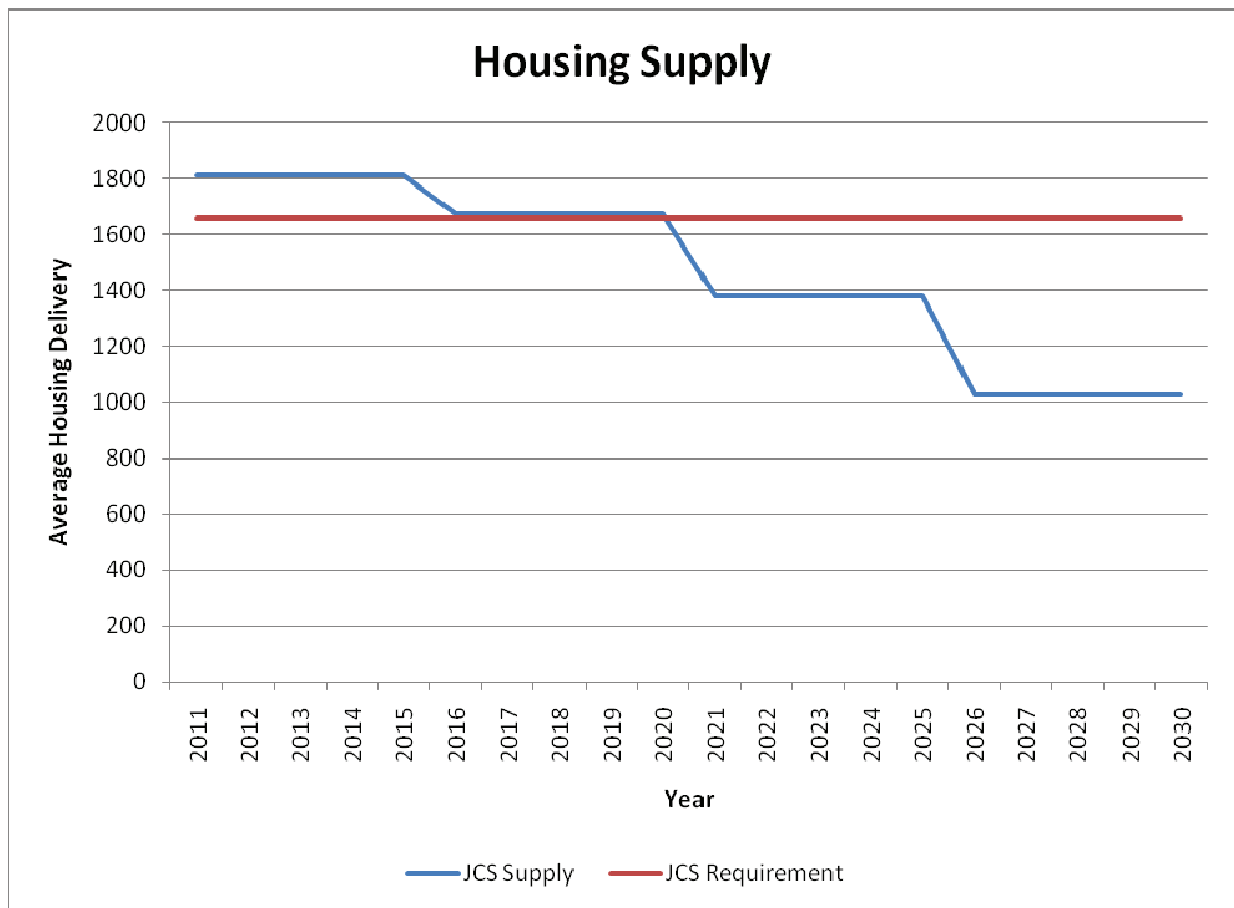
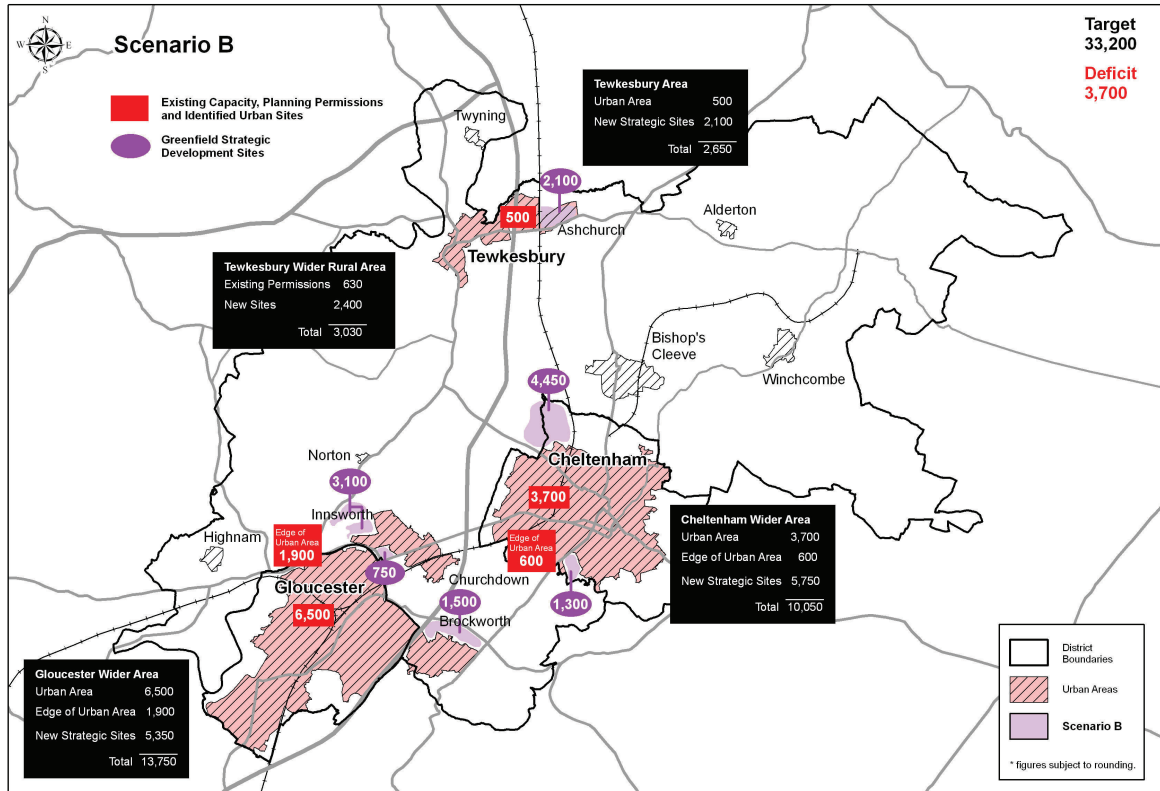


Diagram 4: Scenario B housing supply



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Map 3: Strategic sites scenario B

Initial implications identified by Gloucestershire Affordability Model

This scenario performs significantly better than scenario A in that more homes are provided in the JCS area to meet the demands of people in the early period of the plan, however there is still a loss of population towards the end of the plan period. The profile of people leaving the JCS area in this scenario is still the main working age group of 25 to 59. Of note is that in this scenario this trend is only experienced in Cheltenham and Tewkesbury with Gloucester seeing a rise in this age band. The population loss from Cheltenham is particularly acute and is experienced early in the plan period.

With families moving away, those over 60 years of age form the largest proportion of growth in this scenario. The trend implies that people are growing up in the JCS area as part of family groups but then leaving the area when there is a need to leave home. There is an issue of fewer children being present in Cheltenham in future years as a result of people moving away and the population ageing.

The JCS area still experiences a shortage in housing supply with overcrowding present and properties being unaffordable. The housing market is improved in Gloucester and Tewkesbury with vacancy rates in the market returning to normal levels. This illustrates the housing market is performing well, however, Cheltenham's rate still remain severely low and stagnation of the market is predicted. As a result people will find it difficult to upscale or downsize their property in Cheltenham and are likely to need to move outside of the areas to engage in the property market.

Economically and in particular Cheltenham and Tewkesbury will struggle to compete with the loss of a key sector of its working age population.

The Gloucestershire Affordability Model has indicated, however, that should Gloucestershire become more competitive economically and provide a greater range of opportunities for jobs there is a greater retention of people within the JCS area, particularly in Cheltenham and Tewkesbury in the working age band of 25 to 59. With greater economic performance Cheltenham and Tewkesbury still experience a decline in the working age group but not as severe as an uncompetitive JCS area would experience. Gloucester City on the other hand experiences a greater rise in population with better economic conditions in this scenario. However, with better economic performance and the retention of people, the housing market still struggles to perform in Cheltenham with the vacancy rate being extremely low. Gloucester's housing market along with Tewkesbury's performs well, however, with the greater retention of people there are significant demands for property and affordability worsens. This scenario therefore experiences problems with affordability and housing supply with a greater retention of people.

Will scenario B deliver the JCS strategic objectives?

JCS Objective		Commentary
1. Address the causes and consequences of climate change	AMBER	This scenario does include areas of Greenfield land as strategic locations but avoids areas of flooding. It could, however, still result in a significant loss of population from Cheltenham and Tewkesbury in the working age group. This would increase commuting thereby increasing the impacts of climate change by emissions.
2. Manage and reduce flood risk	GREEN	This scenario avoids areas of flood risk in identifying strategic allocations in the JCS. There is also a requirement to consider water management in new development proposals.
3. Allocate strategic development in support of sustainable urban and rural communities and the conservation of strategic open space	AMBER**	This scenario allocates mixed use strategic development but does still not provide a solution to addressing the issue of people in Cheltenham and Tewkesbury from leaving the JCS area in search of more affordable housing. However with greater economic prosperity it should retain more people and slow down population loss.
4. Conserve and improve the built environment	GREEN	This scenario identifies an appropriate level of development to support the urban areas and avoid the need to rely on higher density development. New development on the edge of the urban areas should be well integrated to existing developed areas.
5. Conserve and improve the natural environment	AMBER	This scenario will result in the loss of green field land but areas of high landscape value are avoided. There will be some loss of high grade agricultural land. This scenario provides for potential improvement areas.
6. Foster economic growth	AMBER**	This option will only achieve positive results in terms of retaining key sectors of the workforce if the JCS area becomes competitive economically. Without this, the JCS area will experience some loss of its population which will affect the economic performance of the area.
7. Provide for sufficient homes	AMBER**	Local housing need is significantly improved over Scenario A. This scenario increases the level of housing provision but there is unmet demand for affordable homes.
8. Address social inequality, inclusivity and community health/safety	GREEN	Strategic allocations will be required to be supported by appropriate community infrastructure.

JCS Objective		Commentary
9. Improve skills and educational attainment	AMBER**	This scenario will see some loss in the working age population and associated skilled people. Appropriate provision will be made for education facilities.
10. Increase access to jobs/services (via sustainable transport modes.	GREEN	The strategic allocation locations are identified in areas of that offer the best opportunities for sustainable travel and make use of existing infrastructure networks.
<i>Table 6: Will scenario B deliver the JCS strategic objectives?</i>		

SCENARIO C

SCENARIO C: PROVIDING NEW HOMES TO MEET THE ESTIMATED HOUSING REQUIREMENT THROUGH SITE ALLOCATIONS (AND BROAD LOCATIONS).

REQUIREMENT 36,850 new dwellings and mid point of 46ha employment land

SHORTFALL TO BE FOUND 7,400 Dwellings

This scenario seeks to maximise the delivery of sites within the urban areas and provide strategic allocations on the edge of the urban areas in accordance with the Development Strategy for the JCS. The overall requirement for this scenario is 36,850 new dwellings. Given that the urban areas, strategic sites and the rural area can provide for 29,500 new homes, the deficit to be found within Broad Locations is approximately 7,400 dwellings.

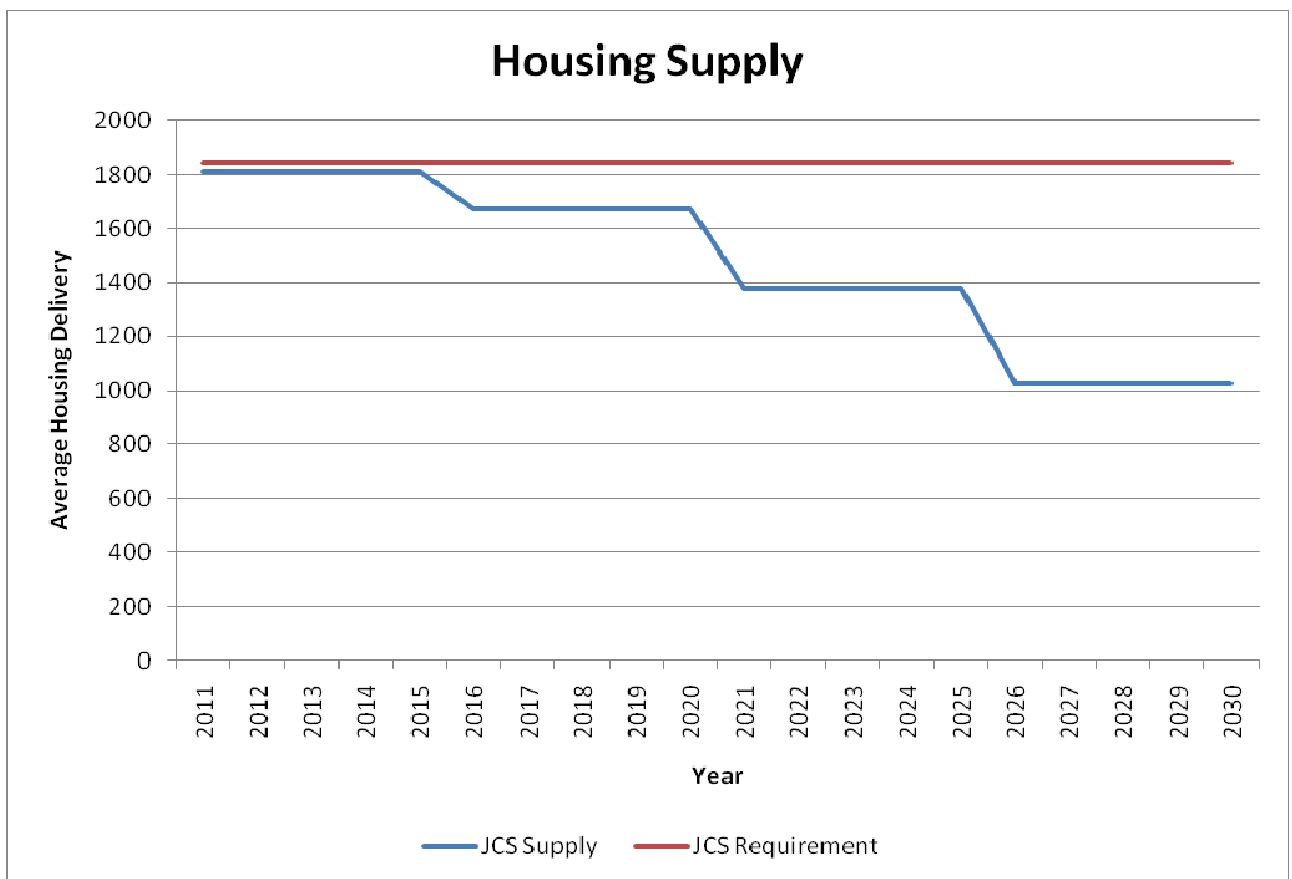
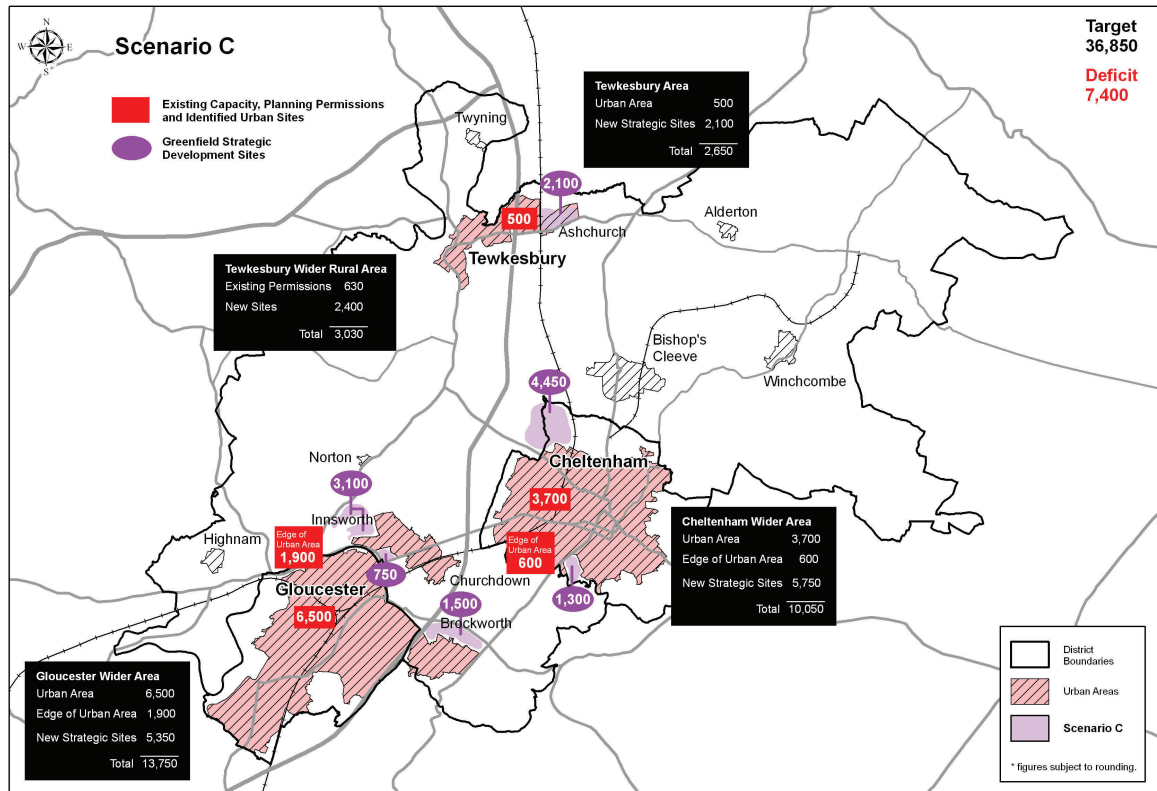


Diagram 5: Scenario C housing supply



Map 4: Strategic sites scenario C

Implications identified by Gloucestershire Econometric Model

Similarly to Scenario B, this scenario provides more positive results over scenario A in that more homes are provided in the JCS area to meet the demands of the local population. However, this scenario still experiences a loss of population towards the end of the plan period and is again driven by people leaving Cheltenham. People leaving the JCS area in this scenario, in the working age group 25 to 59 are mainly from Cheltenham and Tewkesbury whereas Gloucester sees a gain in population in this age band. With younger families moving away, those over 60 will form the largest proportion of growth in this scenario, similar to Scenario B.

The evidence illustrates that with additional houses alone in this scenario, the out migration is only marginally reduced and that the economy is an important factor in dealing with this issue. As with Scenario B, the evidence illustrates that if the JCS area becomes more competitive, it will then retain a greater proportion of its working age population. Scenario C therefore could perform better than scenario B as there are additional new homes being provided which can provide for an improved economic performance of the area and the subsequent demands for new homes.

In summary therefore, this option performs better than scenario B.

Will Scenario C deliver the JCS strategic objectives?

JCS Objective		Commentary
1. Address the causes and consequences of climate change	AMBER	This scenario does include areas of Greenfield land as strategic locations but avoids areas of flooding. It would, however, require additional greenfield development to accommodate the shortfall. There is reduced outflow of working age population which should reduce commuting and therefore emissions. This would scenario would perform marginally better than scenario B.
2. Manage and reduce flood risk	GREEN	This scenario avoids areas of flood risk in identifying strategic allocations in the JCS. There is also a requirement to consider water management in new development proposals. This scenario would also avoid areas of flood risk even with the additional homes.
3. Allocate strategic development in support of sustainable urban and rural communities and the conservation of strategic open space	GREEN**	Without an economic focus to the JCS, this scenario still results in the issue of people in Cheltenham and Tewkesbury leaving the JCS area in search of more affordable housing. However with greater economic prosperity it should retain more people and slow down population loss and creation of more balanced communities.
4. Conserve and improve the built environment	GREEN	This scenario identifies an appropriate level of development to support the urban areas and avoids the need rely on higher density development. The additional development under this scenario on the edge of the urban areas should be well integrated to existing developed areas.
5. Conserve and improve the natural environment	AMBER	This scenario will result in the loss of green field land but areas of high landscape value are avoided. There will be some loss of high grade agricultural land. This scenario provides for potential improvement as with the previous scenario but would require additional Greenfield land for development. Addressing the shortfall would result in additional greenfield land being required but areas of lowest value would be considered above those of higher importance.
6. Foster economic growth	AMBER**	This option will only achieve positive results in

JCS Objective		Commentary
		terms of retaining key sectors of the workforce if the JCS area becomes competitive economically. Without this, the JCS area will experience some loss of its population which will affect the economic performance of the area. Higher levels of new homes provided in this option will support the economic potential of the area to a greater degree than previous scenarios.
7. Provide for sufficient homes	AMBER **	Local housing need is significantly improved over Scenario B, however, with a more competitive JCS area, there would be an increase in the number of people that seek to remain in the area. This will place pressure on the need for new homes. This scenario increases the level of housing provision but there is still a high level of demand for affordable homes.
8. Address social inequality, inclusivity and community health/safety	GREEN**	Strategic allocations will be required to be supported by appropriate community infrastructure. Under this scenario there would be greater potential to retain workforce and families, giving better balanced communities.
9. Improve skills and educational attainment	AMBER **	This scenario will see some loss in the working age population and associated skilled people. Appropriate provision will be made for education facilities. This scenario performs marginally better than scenario B.
10. Increase access to jobs/services (via sustainable transport modes)	GREEN	The strategic allocation locations are identified in areas of that offer the best opportunities for sustainable travel and make use of existing infrastructure networks.

** is only this score if the JCS becomes economically competitive and seeks to retain a greater proportion of its working age population by promoting economic growth. Should this not be the case the score will be different as described in the accompanying text.

Table 7: Will Scenario C deliver the JCS strategic objectives?

SCENARIO D

SCENARIO D: PROVIDING NEW HOMES FOR 10% HIGHER THAN THE ESTIMATED HOUSING REQUIREMENT THROUGH SITE ALLOCATIONS (AND BROAD LOCATIONS).

REQUIREMENT 40,500 new dwellings and minimum of 46ha employment land

SHORTFALL TO BE FOUND 11,000 Dwellings

This scenario seeks to maximise the delivery of sites within the urban areas and provide strategic allocations on the edge of the urban areas in accordance with the Development Strategy for the JCS. The overall requirement for this scenario is 40,500 new dwellings. Given that the urban areas, strategic sites and the rural area can provide for 29,500 new homes, the shortfall to be found within Broad Locations is approximately 11,000 dwellings.

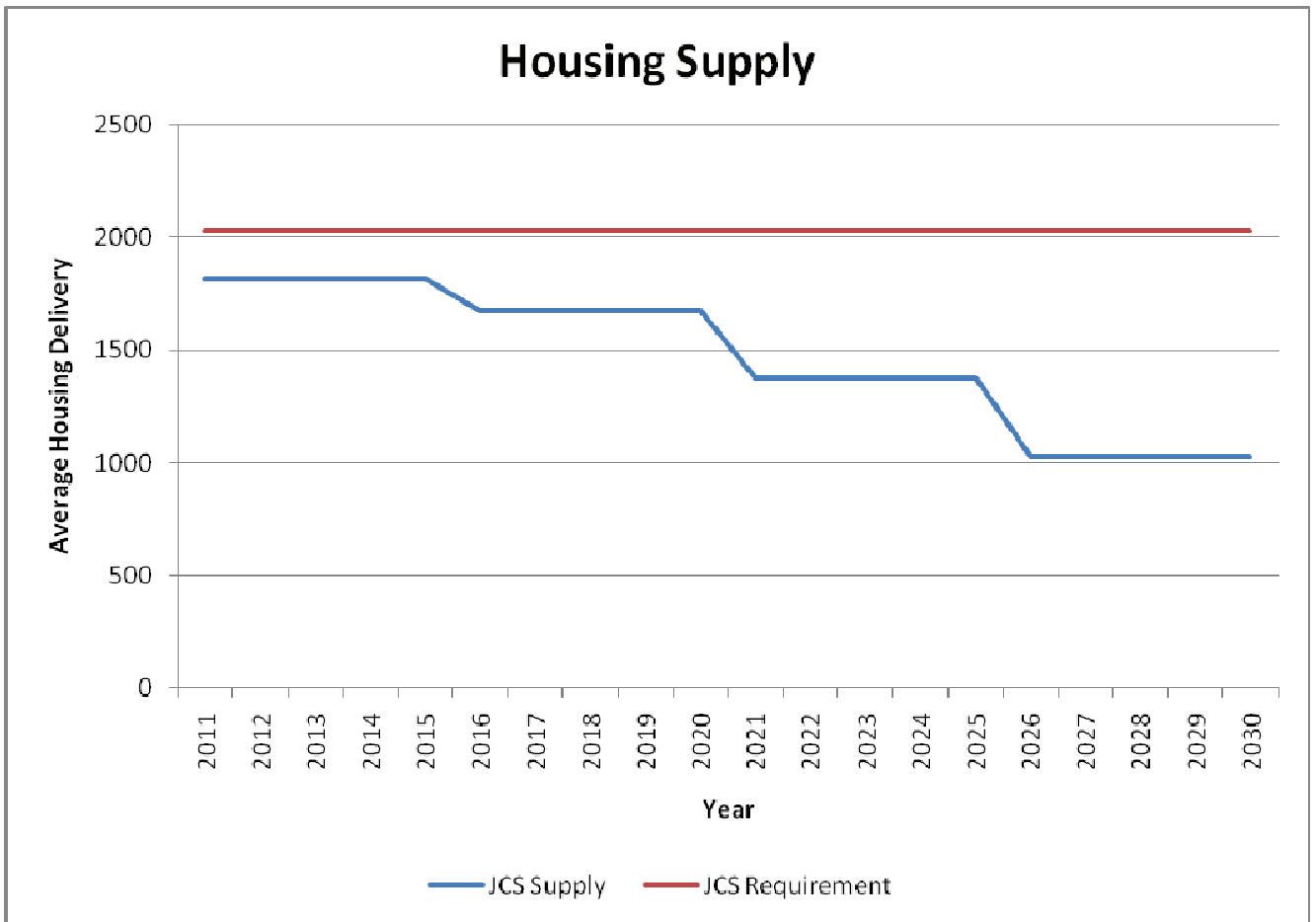
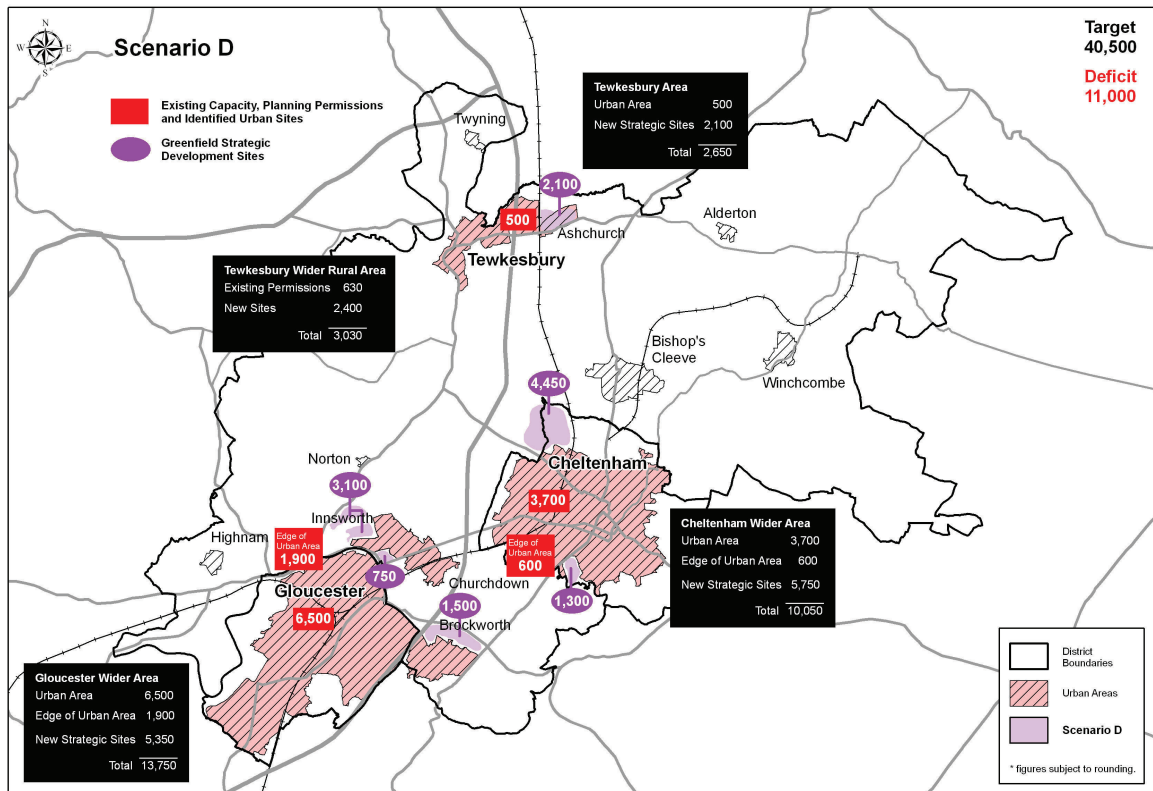


Diagram 6: Scenario D housing supply



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Map 5: Strategic sites scenario D

Implications identified by Gloucestershire Econometric Model

This scenario shows similar trends to that of B and C when additional housing is considered in isolation from economic performance. The scenario does, however, illustrate the importance of delivering economic prosperity alongside new homes. This is because higher levels of new house building without jobs could also lead to housing market failure.

The evidence from this scenario illustrates that with higher levels of homes in the JCS area combined with an uncompetitive job market the provision of new homes could lead to high vacancy rates being experienced in Tewkesbury and Gloucester resulting in more vacant properties on the market than is healthy.

With higher economic competitiveness in the JCS area, this option could perform better than scenario C but it performs far better due to the additional housing provided, meeting the demands for people wishing to stay within the area. The need for affordable homes is better than that in scenario C, however, there could still be a loss in the working age group between 25 and 59 from Cheltenham and a potential significant growth in the population of Gloucester. This suggests that Gloucester is not only retaining its population but may be accommodating population from Cheltenham due to lower house prices.

Will Scenario D deliver the JCS strategic objectives?

JCS Objective		Commentary
1. Address the causes and consequences of climate change	AMBER	This scenario does include areas of Greenfield land as strategic locations but avoids areas of flooding. It would, however, require more greenfield development than scenarios B and C to accommodate the shortfall.
2. Manage and reduce flood risk	AMBER	This scenario continues to avoid areas of flood risk in identifying strategic allocations. There is also a requirement to consider water management in new development proposals. Greater levels of development than under scenarios B and C. There should still be sufficient land within flood zone 1 but clearly greater pressure for development in higher risk areas than under scenarios B or C.
3. Allocate strategic development in support of sustainable urban and rural communities and the conservation of strategic open space	AMBER**	Without an economic focus to the JCS, this scenario still results in the issue of people in Cheltenham and Tewkesbury leaving the JCS area in search of more affordable housing. However, with greater economic prosperity it should retain more people and slow down population loss and creation of balanced communities, but may lead to additional rural development.
4. Conserve and improve the built environment	AMBER	This scenario may require additional development to be provided in the urban areas at higher densities, in addition to the pressure on rural areas above.
5. Conserve and improve the natural environment	AMBER	This scenario will result in the loss of green field land but areas of high landscape value are avoided. There will be some loss of high grade agricultural land. This scenario provides for potential improvement as with the previous scenario but would require additional Greenfield land for development. Addressing the shortfall would result in additional greenfield land being required but areas of lowest value would be considered above those of higher importance.
6. Foster economic growth	GREEN**	This option will only achieve positive results in terms of retaining key sectors of the workforce if the JCS area becomes competitive economically. Without this, the JCS area will experience some loss of its population which will affect the economic performance of the area. Higher levels of new homes provided in this option will support the economic potential of the area to a greater degree than

JCS Objective		Commentary
		previous scenarios.
7. Provide for sufficient homes	GREEN**	This option provides the best scenario for addressing the need for affordable homes. It can provide homes for a larger proportion of all sectors of the market including private and affordable homes and greater choice.
8. Address social inequality, inclusivity and community health/safety	GREEN**	This scenario provides an even greater opportunity than the other scenarios for homes to address housing need and with a greater retention of the workforce there are opportunities for people to generate wealth through jobs.
9. Improve skills and educational attainment	GREEN**	This scenario will see some loss in the working age population and associated skilled people. Appropriate provision will be made for education facilities. This scenario performs marginally better than scenario C.
10. Increase access to jobs/services (via sustainable transport modes)	AMBER	The strategic allocation locations are identified in areas of that offer the best opportunities for sustainable travel and make use of existing infrastructure networks. However it may be harder to accommodate all the development at similarly sustainable locations.

** is only this score if the JCS becomes economically competitive and seeks to retain a greater proportion of its working age population by promoting economic growth. Should this not be the case the score will be different as described in the accompanying text.

Table 8: Will Scenario D deliver the JCS strategic objectives?

PHASE 2: OPTIONS FOR DEVELOPMENT 2021 – 2031 (BROAD LOCATIONS)

As set out in the previous development strategy section, each of scenarios B, C and D currently include a shortfall of housing to 2031 as shown below. In order to establish how the shortfall for each of these scenarios could be met, three themes have been identified for consultation.

The current scenario shortfall figures are:

	Requirement for new homes	Range	Current phase 1 delivery	Deficit required
Scenario B	33,200	-10%	29,500	3,700*
Scenario C	36,850	Current local projection of housing need	29,500	7,350*
Scenario D	40,500	+10%	29,500	11,000*
<i>* figures rounded</i>				

Table 9: Scenario deficit Scenario A is not included as it has no shortfall nor is it a sound alternative to pursue.

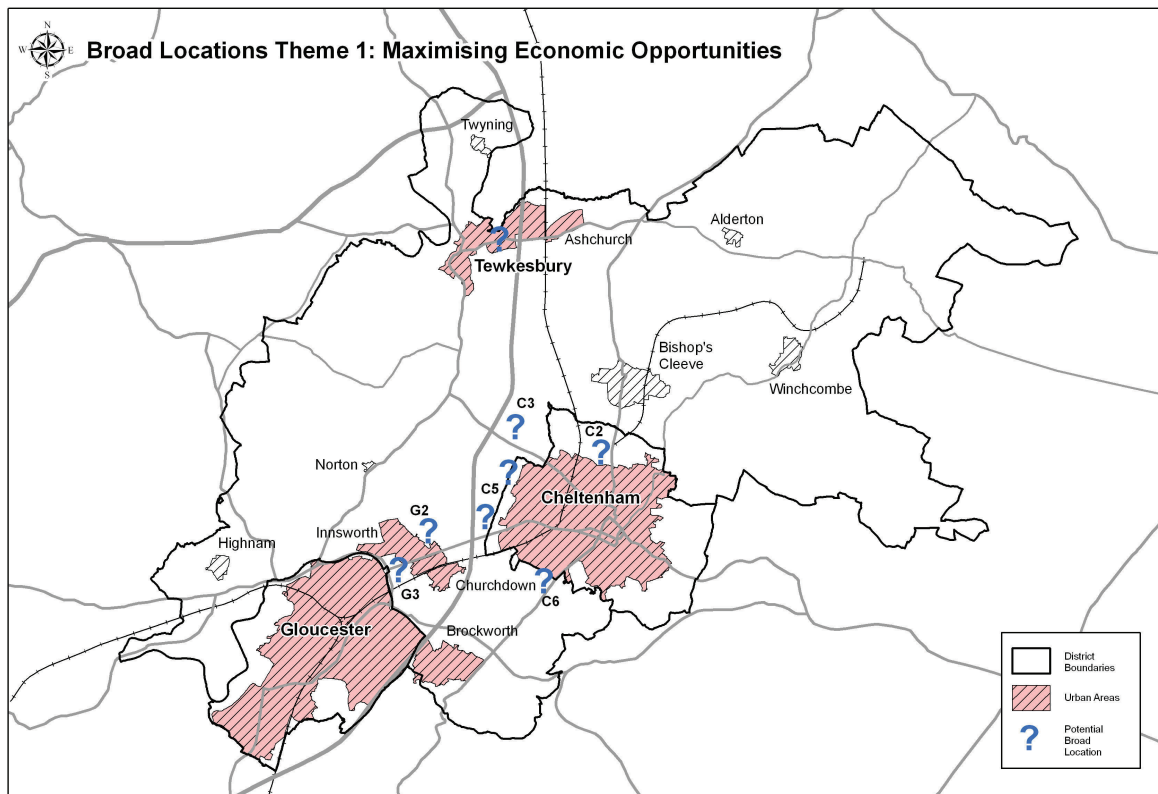
The shortfalls are proposed to be addressed through one of the themes below:

1. Maximising economic opportunities
2. Protect the Green belt to prevent the coalescence of Gloucester and Cheltenham and Cheltenham and Bishop’s Cleeve, or
3. Make the best use of existing infrastructure

Additional work will be carried out as part of preparing the development of the preferred option. Each of the themes are outlined and illustrated below for consideration. To accommodate the shortfalls there may be a need to consider solutions in discussion with other authorities beyond the JCS area.

THEME 1: Maximising economic opportunities

This theme continues the existing development strategy of fostering economic growth and providing new housing and employment land in locations that have the best opportunities for both creating jobs, and providing those jobs near large areas of population to minimise the need for commuting. It also looks to place employment land and housing in the most accessible of locations to reduce the need for additional infrastructure. Under this option Gloucester and Cheltenham areas would continue to provide the majority of development on the edge of the urban areas for both employment and housing with limited new development elsewhere in Tewkesbury Borough.



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Map 6: Theme 1 Maximising Economic Growth

Cheltenham

A new business park could be provided as an addition to the development of north west Cheltenham at Junction 10 of the M5 motorway. This could be located adjacent to Cheltenham and deliver the objective of promoting employment land adjacent to the main urban areas. The limited movements available at Junction 10 of the M5 may, however, reduce the advantage of this location unless remodelling of the junction is achievable.

There is also an opportunity to consider employment land to the west of Cheltenham adjacent to the town and between the A40 and the B4063. This is a substantial location and could be considered for an additional business park and residential uses. Access arrangements onto the A40 may constrain the accessibility of this site, however, similar to the above broad location it is located adjacent to Cheltenham.

New housing development could be provided to the south of Cheltenham extending the urban area southwards while still protecting the important gap between Cheltenham and Shurdington. Another possible location is to the north of the town, which offers the potential to provide new homes adjacent to the existing town and areas of potential new employment, services and facilities.

Gloucester

An opportunity for additional employment land within this location is the area of land at Elmbridge Court between the A40 and the existing railway line. This could provide the opportunity for a new business park adjacent to the existing urban area. This site could make use of existing infrastructure and could link to the Elmbridge park and ride scheme.

There is an opportunity to investigate further residential development to north of Churchdown and to the north of Innsworth.

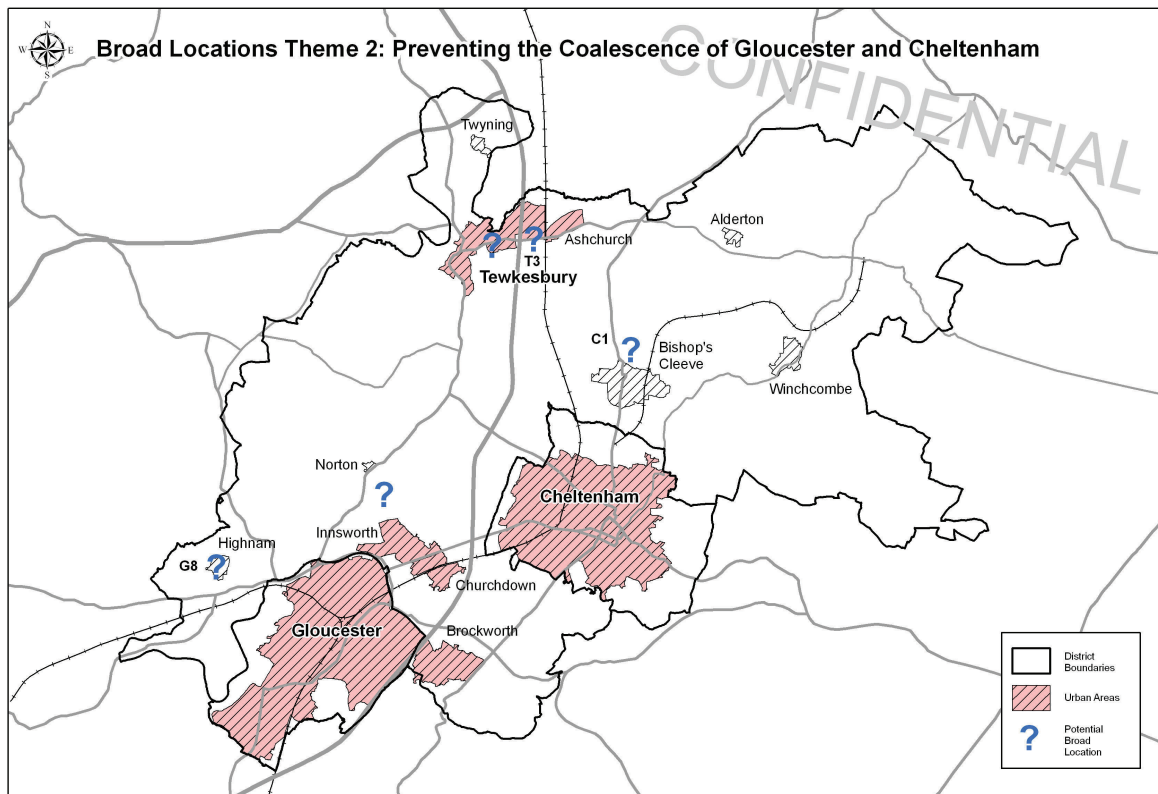
Gloucester/Cheltenham airport could provide additional economic opportunities. This is close to existing areas of population and workforce as well as existing infrastructure.

Tewkesbury town

Additional employment land and housing land would be limited under this option at Tewkesbury town where the focus is upon the principal settlements of Gloucester and Cheltenham.

THEME 2: Preventing the coalescence of Gloucester, Cheltenham and Bishop's Cleeve

This theme seeks to maintain green belt Boundaries that ensure that Gloucester, Cheltenham and Bishop's Cleeve do not coalesce. This could include options beyond the JCS area, to be explored further with adjoining planning authorities. Under this option further development into the green belt between Gloucester, Cheltenham and Bishop's Cleeve would be restricted and additional development distributed to locations beyond the green belt. This could include further development at Tewkesbury town and the key rural settlements within close proximity to Gloucester and Cheltenham in accordance with the overarching strategy of promoting an economic led strategy.



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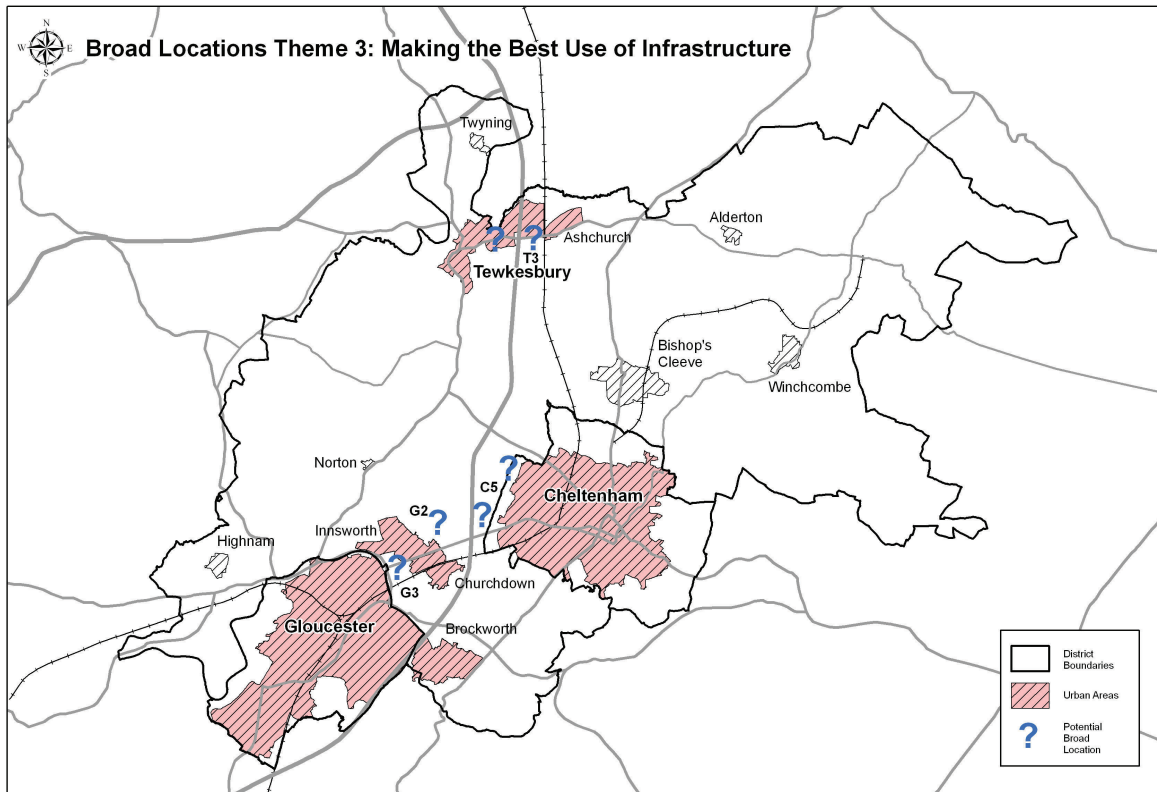
Map 7: Theme 2 Preventing the coalescence of Gloucester and Cheltenham

Locations that are considered under this theme include Highnam and Bishop’s Cleeve which could provide additional homes given their proximity to Gloucester City and Cheltenham respectively.

Tewkesbury town may also need to play a larger role in this scenario and there are opportunities for additional development to the north and east of the town that area away from existing areas of flooding. Additional employment land could be provided to the south of Tewkesbury town/Ashchurch away from existing areas of flooding.

THEME 3: Making the best use of existing infrastructure

This theme focuses on locating development where the existing infrastructure and facilities are available and can reduce the need for additional investment. This is particularly important given that funding for infrastructure may be even more difficult to obtain in future. This theme will be informed by where spare capacity exists on current networks and where the opportunities to provide new infrastructure are best. This will be informed by the work on the JCS Infrastructure Plan.



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Map 8: Theme 3 Making the best use of infrastructure

The focus of locations in this theme is the settlements of Gloucester, Cheltenham and Tewkesbury. There is correlation between this theme and the theme maximising economic opportunities. However, this could mean a greater focus of development in locations between Cheltenham and Gloucester.

In this context the employment locations at west Cheltenham and at Elmbridge could provide the best opportunities given that the location at north west Cheltenham would require costly junction modifications to Junction 10 of the M5 motorway. Additional land could also be provided at Tewkesbury town to maximise the opportunities of access to Junction 9 of the M5 motorway.

Residential development could in principle also follow the same focus with locations between Gloucester and Cheltenham being more attractive in terms of infrastructure provision. Opportunities to the North of Gloucester could be linked with opportunities to the west of Cheltenham in terms of joint funding of transport infrastructure between the two settlements and central service or infrastructure hubs providing for both locations.

PROPOSED CONSULTATION DRAFT STRATEGIC DEVELOPMENT MANAGEMENT POLICIES

The following development management policies have been drafted for consultation and illustrate how the vision and development strategy could be delivered. These are the [policies that will provide the strategic framework for more detailed local planning policies contained within future local plans of each JCS authority. The policies reflect the current emerging strategy that is being consulted upon and will be reviewed to take account of any changes to the strategy arising from this consultation. At the next stage of consultation the strategic development management policies will include additional policies including the phasing, infrastructure provision, delivering a continuous supply of housing, housing mix, employment, masterplanning and design.

PROPOSED SETTLEMENT HIERARCHY

The following settlement hierarchy is proposed which will be used to deliver the development strategy.

Category	Settlement Tier	Settlements included	
Gloucester wider Policy area	First	Gloucester City Hucclecote Brockworth Innsworth Longford Churchdown	These settlements are the main focus for new homes, jobs, retail, leisure, education and cultural development. They make best use of existing principal infrastructure networks. They represent the most sustainable locations for development.
Cheltenham wider Policy Area	First	Uckington Noverton Park Southam	
Tewkesbury Town Wider Area	Second	Tewkesbury Town Ashchurch Northway Wheatpieces	These settlements have their own high level of services, facilities and local employment. The existing motorway junction and railway station at Ashchurch provides good communication links.
Larger Settlements	Third	Bishop’s Cleeve Ashleworth	These settlements provide important local facilities reducing the need to travel to the principal locations of Cheltenham or Gloucester, this is particularly important for

Category	Settlement Tier	Settlements included	
		Winchcombe Alderton Highnam Toddington Shurdington Maisemore Twyning Gotherington Dumbleton Southam	access to shops, schools or health care which are needed on a regular basis
Medium Settlements	Fourth	Apperley Aston Cross Aston-on-Carrant Badgeworth Boddington Brockhampton Chargrove Down Hatherley Elmstone Hardwicke Forthampton Greet Gretton	These settlements contain services and facilities but on a reduced level when compared with the larger settlements. They primarily serve the needs of local residents and visitors but may serve a wider rural area to a more limited extent

Category	Settlement Tier	Settlements included	
		Little Witcombe Minsterworth, Norton Oxenton Pamington Sandhurst Snowshill Southam Stanway Staverton Stoke Orchard Teddington Tirley Tredington Twigworth	
Small Settlements	Fifth	Alstone Barrow Bentham Buckland Chaceley Charlton Abbots Deerhurst Deerhurst Walton	These settlements will have few, if any, facilities and services. They may be poorly served by public transport and some distance from local employment opportunities. These settlements are less likely to serve the needs of residents and visitors to the surrounding rural area

Category	Settlement Tier	Settlements included	
		Didbrook Fiddington Great Washbourne Great Witcombe Hardwicke Hasfield Hawling Laverton Little Washbourne Prescott Priors Norton Shuthonger Stanton The Leigh Walton Cardiff Wood Stanway Wormington	

Table 10: Settlement Hierarchy

PROPOSED POLICY JCS A: JCS Development Strategy

The following strategy provides a long term planning framework for the JCS area.

Major employment, retail and leisure development will be directed to the central areas of Gloucester and Cheltenham to make the best use of land, existing infrastructure and to deliver regeneration.

Additional development will be located on the periphery of Cheltenham and Gloucester at the most sustainable locations.

New homes and employment will be directed to Tewkesbury town to strengthen its role as a major market town and provider of local services and support regeneration initiatives. Rural areas will provide new homes and limited rural employment in accordance with the settlement hierarchy.

All development will be required to adequately provide infrastructure according to the requirements of the Joint Core Strategy Infrastructure Plan.

GLOUCESTER WIDER POLICY AREA:

The Gloucester wider policy area will accommodate a minimum of 13,750 new homes as part of phase 1 of the development strategy. These locations are where the existing city centre is most accessible, contribute to the urban regeneration programme, make best use of existing infrastructure while minimizing the impacts on the landscape and avoid major areas of flooding.

The city will identify land to accommodate over the plan period;

- 6,500 new homes within Gloucester
- 3,100 new homes to the north of Gloucester at Innsworth (Tewkesbury borough)
- 1,500 new homes to the east of Gloucester at Brockworth (Tewkesbury borough)
- 750 new homes to the north of Gloucester at Churchdown (Tewkesbury borough)

CHELTENHAM WIDER POLICY AREA:

The Cheltenham wider policy area will accommodate a minimum of 10,050 new homes as part of phase 1 of the development strategy. The preferred directions for development on the edge of Cheltenham are at those locations which best contribute to the urban regeneration programme.

The borough will identify land to accommodate over the plan to period;

- 3,700 new homes within Cheltenham
- 4,450 new homes to the north west of Cheltenham (Cheltenham and Tewkesbury boroughs)
- 1,300 new homes to the south of Cheltenham (Cheltenham borough)

TEWKESBURY BOROUGH POLICY AREA:

Tewkesbury town and the rural area will accommodate 5,600 new homes. Major new employment and housing will also be delivered at Tewkesbury town/Northway/Ashchurch. Whilst development will be

focused upon central areas of the town as part of the masterplan and following the sequential process, peripheral development will also be required that does not provide flood risk or exacerbate existing areas of flooding. DSDC Ashchurch and adjoining land to the north may provide an opportunity for a mixed use re-development including 2,100 new homes should it close.

The borough will identify land to accommodate over the plan to period;

- 500 new homes within Tewkesbury town
- 2,100 new homes to the east of Tewkesbury town at Ashchurch (Tewkesbury borough)
- Beyond Gloucester, Cheltenham and Tewkesbury town, developments of a smaller scale (120 homes per year) will be distributed to the rural settlements in accordance with the settlement hierarchy.

PROPOSED POLICY JCS B: Meeting affordable housing needs

Proposed policy options

The JCS authorities believe that all new residential development shall contribute to the provision of affordable housing. Views are sought through the following options:

Option A

- On sites of less than 5 dwellings a financial contribution will be negotiated towards affordable housing provision.
- For sites of 5 dwellings or more, no less than 40% of the dwellings should be affordable.

Or

Option B

- On sites of less than 5 dwellings a financial contribution will be negotiated towards local affordable housing provision.
- For sites of 5 or 6 dwellings a contribution of 2 affordable units will be required
- For sites of 7 or 8 dwellings a contribution of 3 affordable units will be required
- For sites of 9 or 10 dwellings a contribution of 4 affordable units will be required
- For sites of 10 or more, no less than 40% will be affordable

Or

Option C

- As A or B but include a requirement that in the Tewkesbury rural area, i.e. one outside of the Gloucester, Cheltenham or Tewkesbury wider area, no less than 50% of dwellings should be affordable.

The size, property type, tenure, quality standard and distribution of affordable homes to be provided as part of development proposals could be subject to negotiation dependent upon the housing need, site characteristics and development viability. On sites where the affordable housing provision set out above is proven to the satisfaction of the local planning authority not to be viable, the maximum proportion or contribution to affordable housing will be sought that does not undermine the development's viability. Financial viability assessments evidence will be required that conform to an agreed methodology and where necessary independently appraised by the local authority at the cost of the applicant. Contingent Deferred Obligations and other flexible arrangements will be sought through planning agreements on a case by case basis, to allow for changing market conditions in future.

The local authorities preferred solution is on-site provision for developments of 5 dwellings or more. Where it can be demonstrated to the satisfaction and agreement of the local planning authority, off site contributions either as dwellings on a suitable alternative site or financial contribution would be acceptable.

The manner in which this policy will be implemented will be set out in affordable housing supplementary planning documents prepared by the JCS authorities. Early pre-application discussions will be expected in all affordable housing negotiations.

Which option do you consider would be most effective in achieving affordable housing in the JCS area?

Evidence set out in the three Housing Needs Assessments (2010) for Gloucester, Cheltenham and Tewkesbury indicate that there is a significant annual requirement for new affordable homes. This is supported by the Gloucestershire Affordability Model which sets out that against the scenarios in this document there is a high level of annual need for affordable homes across the JCS area

In current local Plan policies a significant number of smaller sites across the JCS area have delivered just under the threshold and have therefore not been required to contribute towards meeting the identified affordable housing need. However, the identified shortfall in affordable housing provision across the JCS area could be reduced if all sites were to make an affordable housing contribution where is viable to do so.

It is fully intended to subject the above proposed policy to viability testing as part of the preferred JCS document in 2012 alongside the implications of infrastructure funding and the viability of the proposals in the JCS as a whole.

Consultations on Issues and Key Questions

The issues and key questions consultation responses identified the need to continue to provide affordable housing within the JCS area for both rural and urban areas. The need to provide affordable dwellings in small settlements and villages was clearly identified as well as the need to continue to provide affordable units in new developments adjacent to the major settlements.

Respondents suggested thresholds between two and 15 (to include both new build and conversions), and targets between 35% (in line with the RSS) and 50%. Several respondents suggested setting site-specific figures, or varying figures according to settlement type and size in line with guidance from the Campaign to Protect Rural England (CPRE).

Several respondents highlighted that the JCS will outlast the economic downturn and called for high and defensible targets/thresholds in spite of developers' likely viability objections.

PROPOSED POLICY JCS C: Rural exception sites

Proposed policy direction

Provision for new housing will be encouraged in rural settlements in accordance with the settlement hierarchy. However those settlements identified as being suitable for further development, where it can be demonstrated that there are exceptional circumstances for affordable housing to meet a local need, consideration will be given to allowing developments on the basis of the following criteria:

1. new development will provide homes that meet a clearly identified local affordable housing need either: through a local housing needs assessment that relates specifically to the immediate settlement and adjacent rural parishes; or through other such robust and defensible assessment of housing needs specific to the settlement area
2. the need cannot be reasonably met within the development limits of the settlement concerned, where it would be permitted under normal policies
3. the site has reasonable access to local services and facilities; and/or public transport; or where it can be demonstrated that the provision of housing for local people will assist the sustainability of the settlement area
4. the development is in scale and in keeping with the form and character of the settlement and local landscape setting
5. it can be agreed that the development will be subject to a planning obligation to ensure that all initial and subsequent occupiers of the affordable dwellings will be to meet the continuing needs of local people

The JCS authorities understand that in some instances it will not be possible to deliver 100% affordable housing on an exception site. In this instance we recommend that as an exceptional circumstance consideration will be given to a percentage of open market housing to cross subsidise affordable housing provision. In such circumstances early discussion with the local planning authority will be required where it can be demonstrated that:

1. there is clear recognition from the local community of the need to provide affordable housing;
2. there is no public subsidy or there is insufficient other subsidy available to support affordable housing development without cross subsidy from market homes on the development scheme;
3. the development would provide the maximum viable level of affordable housing.

For such development proposals, the applicant will be required to provide supporting evidence in the

form of an open book development appraisal that may be independently assessed by the Council at the cost to the applicant.

Further details on the implementation of this policy will be set out in Supplementary Planning Documents.

Reasoned justification

It is particularly difficult to secure an adequate supply of affordable homes for local people in rural areas, particularly with subsidies now significantly reduced and while the principal urban areas are the foci of new homes there is a need to ensure local rural housing need is met. Fewer rural affordable homes are likely to be delivered to meet specific and identified local housing need.

The localism bill seeks to give local communities more power in deciding how their local areas can grow and develop. While community based plans need to be in general conformity with an adopted local development plan, the rural exception sites criteria based policy will provide an opportunity for local communities to develop sites for affordable homes, where open market dwellings might not normally be permitted.

Consultations on issues and key questions

The issues and key questions consultation responses identified the need to continue to provide affordable housing within the JCS area for both rural and urban areas. The need to provide affordable dwellings in small settlements and villages was clearly identified as well as the need to continue to provide affordable units in new developments adjacent to the major settlements.

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PROPOSED POLICY JCS D: Green belt

Proposed policy direction

A green belt is to be maintained in the JCS area although it is still to be subject to a fundamental review in order to define its extent and to establish reasonable long term boundaries taking into account development needs on the edges of Gloucester and Cheltenham.

The boundaries of the reviewed green belt will be defined on the JCS proposals map. The boundary identified will take 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 at the end of this plan period.

Only those uses considered to be appropriate within a green belt, as defined by national planning policy guidance, will be considered suitable for development within the redefined JCS green belt, there will therefore be a presumption against any new development which is inappropriate within the redefined green belt.

This policy direction is preferred as in order to be able to accommodate the housing and employment growth likely to be required for the JCS area. The boundary of the green belt needs to be reviewed to enable development at the most sustainable locations over the next 20 years and beyond. In undertaking such a fundamental review consideration can also be given to development needs beyond 2031.

Consultation on issues and key questions

The issues and key questions consultation responses indicated that there was particularly strong resistance to further new development in the existing green belt, however some responses called on the authorities to build on the existing employment opportunities in and around Gloucestershire airport and to allow more employment development in this location.

PROPOSED POLICY JCS E: Flood risk and water management

Proposed policy direction

Flooding and effective water management is a serious issue across the JCS area given it is a location that has experienced significant flooding incidents, the most recent being in 2007. Flooding and water management is therefore a critical consideration in balancing the need to deliver the vision of a more prosperous local economy and attractive location to live against the environmental constraints of the area.

The Joint Core Strategy authorities in preparing the JCS and local plans should:

- apply the Sequential Test and sequential approach to directing site allocations and broad locations for development to locations with the lowest probability of flooding
- where the Sequential Test alone cannot deliver acceptable sites, the Exceptions Test should be applied
- on green field sites within flood zone 3 less vulnerable and water compatible uses may be acceptable, all other uses should be avoided. Opportunities to reinstate floodplain or flood storage throughout flood zone 3 will be sought wherever possible
- urban previously developed sites within areas of existing flood zone 2 and 3 should be considered through the Sequential Test and (if appropriate) the Exception Test where there is a clear need to meet regeneration requirements in a sustainable manner
- all development should adhere to the advice contained within the most current version of the Joint Core Strategy strategic flood risk assessment (Level 1 and 2) and guidance provided on flood risk contained within Planning Policy Statement: 25
- where sufficient evidence that the development of a site of less than 1 hectare in Flood Zone 1 may cause increased flood risk, then a detailed flood risk assessment should be undertaken by the developer
- all new development will be required to deal with surface water in accordance with the principles of SUDS (Sustainable Drainage). This should take account of quality, quantity and amenity, any design should follow the management train principle
- all new development should investigate the opportunities to improve runoff rates from a site to reduce flood risk. In areas of identified surface water flood risk and/or where the receiving watercourse has insufficient channel capacity, a greater reduction in surface water runoff would be required
- on greenfield sites, developments should attenuate runoff so as to not exceed the corresponding greenfield rates generated by a range of storm events with the probability of occurring up to and including once in 100 years. An allowance should be made for the additional flow generated by climate change
- on previously sites, sustainable drainage schemes should reduce the proven current instantaneous runoff rate by a minimum of 5%

Consultations on issues and key questions

The issues and key questions consultation responses indicated that there was consensus on the importance of this issue for the JCS area but there was disagreement over the adequacy of current policies to address it. Many respondents considered that JCS policies should go beyond national planning policy with regard to flooding while the development industry viewed the current policy and technical assessment framework found in Planning Policy Statement: 25 as adequate.

PROPOSED POLICY JCS F: Town centre development

Proposed policy direction

This policy sets out the key core principles that will be applied to town centre uses in the JCS area. Further, more detailed policies will be set out within other development plan documents to be prepared by the individual JCS authorities. To ensure the successful delivery and maintain investor confidence in key town centre regeneration schemes, both the sequential test and impact test will be strictly applied by the relevant planning authority, in accordance with Planning Policy Statement: 4. The same tests will be applied in smaller designated centres in order to maintain their vitality and viability to provide for the everyday needs of the local communities.

The JCS should apply the following core principles to development in town centres:

- protect the vitality and viability of designated town centres
- support new retail and other town centre use development in designated centres commensurate with their role and function (as defined by the settlement hierarchy), including provision of a good range of shopping, food and drink uses, services, offices, entertainment, cultural and leisure facilities, and high quality public spaces
- apply the sequential approach to site selection, whereby sites located within designated town centres must be robustly assessed for their ability to accommodate the development before other, less central sites are considered
- all applications for new retail or other town centre uses must demonstrate an acceptable impact on the vitality and viability of a designated centre and must demonstrate that they do not undermine the regeneration objectives for the area

Safeguarding the main town centres of Gloucester and Cheltenham will be key to ensuring that the JCS area is a thriving and attractive place to live and work over the lifetime of the plan. This policy is required in order to safeguard the town centres from inappropriate edge and out of centre development by uses which should more reasonably be located in the central area. The policy direction

also acknowledges the need for new development in the broad locations to provide a measure of retail development at a level appropriate to meet local requirements.

Reasoned justification

The JCS area has a rich and diverse town centre offer, which attracts shoppers, tourists and other visitors from across Gloucestershire and the wider area. The two main centres are Gloucester and Cheltenham, whilst smaller centres, such as Tewkesbury and Winchcombe, providing more for the day-to-day needs of a large rural hinterland. There are also a large number of smaller district and local centres, in both urban and rural locations, which provide for localised day-to-day shopping and service needs.

Whilst centres are performing well there are some areas where there has been a noticeable decline in health, for example in terms of the number of unit vacancies, including retail but also offices, pubs and restaurants. Whilst the recession has played a part in this, protecting the existing designated centres is the key to ensuring their continued vitality and viability.

In the JCS area a number of key regeneration sites are currently being progressed, by the Gloucester Heritage Urban Regeneration Company (GHURC), Cheltenham Development Task Force (CDTF) and through the Tewkesbury town masterplan. These schemes are critical to maintaining and enhancing the performance of these centres, and in the case of Gloucester and Cheltenham, their ability to compete against other centres in the sub-region.

Consultations on issues and key questions

The issues and key questions consultation responses indicated a strong desire from respondents for the regeneration that has been commenced in all three centres to continue to be pursued, acknowledging the complementary roles of Gloucester and Cheltenham. The need to improve the town centres was highlighted along with a need to provide balanced evening and night time economy activities.

PROPOSED POLICY JCS G: Gypsy and traveller accommodation

Proposed policy direction

National planning guidance sets out that local authorities should assess the needs of gypsy, traveller and travelling showpeople communities, and provide through development plans, where possible, specific deliverable site allocations to provide for that identified need. The 2007 GTAA has provided the basis for the above preferred policy direction however the reviewed 2012 GTAA will provide updated evidence on which the preferred option policy will be based.

New gypsy, traveller and travelling showpeople sites should be provided at the strategic allocations and broad locations. Outside identified sites where there is an identified need, proposals will be assessed against a criteria based policy.

Consultations on issues and key questions

The issues and key questions consultation responses indicated that existing underused brownfield sites, including any underused land owned by public bodies, should be considered for use by travelling communities before allocating green field sites. Responses also suggested that sites should be in close proximity to schools, doctors and services and that a number of smaller sites should be provided (10 pitches or less) rather than fewer sites providing a larger number of pitches.

JCS EVIDENCE BASE

Document	Available at
Broad Locations Report	
CBC SHLAA (Oct 2010)	http://www.cheltenham.gov.uk/downloads/file/2046/strategic-housing-land-availability-assessment-2010
GCC SHLAA (July 2010)	http://www.gloucester.gov.uk/Documents/councilservices/Planning/LDF/SHLAA/GloucesterSHLAAJuly2010.pdf
Gloucestershire Housing Trend Analysis and Population and Household Projections (May 2011)	http://www.gct-jcs.org/Documents/EvidenceBase/GloucestershireHousingTrendAnalysisPopulationandHouseholdProjections(May2011).pdf
Gloucestershire Renewable Energy Study	http://www.gloucestershire.gov.uk/index.cfm?articleid=102901
Gloucestershire Strategic Housing Market Assessment (SHMA)	http://www.gloucestershire.gov.uk/index.cfm?articleid=15389
Gloucestershire Strategic Infrastructure Delivery Plan (SIDP)	http://www.gloucestershire.gov.uk/index.cfm?articleid=101114
Green belt Review (Sept 2011)	http://www.gct-jcs.org/EvidenceBase/GreenBeltReview.aspx
Gypsy and Traveller SHLAA	
Hotel Capacity Study	http://www.gct-jcs.org/EvidenceBase/HotelCapacityStudy.aspx
NLP Employment Land Review (March 2011)	http://www.gct-jcs.org/EvidenceBase/EmploymentStrategy.aspx
Settlement Audit	
Strategic Flood Risk Assessment Level 1 (SFRA1)	http://www.gloucestershire.gov.uk/index.cfm?Articleid=17247
Strategic Flood Risk Assessment Level 2 (SFRA2)	

SEA/SA	
TBC SHLAA (Sept 2011)	http://www.tewkesbury.gov.uk/shlaa
Entec Urban Extension Definition Study (July 2010)	http://www.gct-jcs.org/EvidenceBase/UrbanExtensionDefinitionStudy.aspx
Infrastructure SDIP	

Joint Core Strategy Response Report on Consultation Carried Out to Date Issue: October 2011

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Appendices (located on JCS website)

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APPENDIX C – Interactive maps (Issues and Key Questions consultation)

APPENDIX D – Summary of post-it note responses (Issues and Key Questions consultation)

APPENDIX E – Locations identified as suitable for development in short questionnaire (Issues and Key Questions consultation)

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APPENDIX H – Constraints maps

APPENDIX I – Strategic objectives (quoted from *Issues and Key Questions Consultation Document*)

APPENDIX J – Online questionnaire (Part 1 consultation)

APPENDIX K – Spatial Portrait (Part 1 consultation)

APPENDIX L – Key Issues (Part 1 consultation)

APPENDIX M – Vision (Part 1 consultation)

APPENDIX N – Developing the Spatial Options: Stakeholder and Parish Council consultation.

A. Introduction and summary of activities

1. Introduction

The Joint Core Strategy (JCS) is a partnership between Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council. The Councils will produce a co-ordinated strategy guiding how the three authority areas develop up to 2031. It will set out their approach to dealing with climate change, protecting and enhancing the natural and historic environment, and establishing the location and timing of new housing, employment, key infrastructure, community, leisure and tourism facilities.

Preparing a Joint Core Strategy means making choices about how the area will develop, so it's important that local communities are involved and have a say in the future of their area. To ensure the JCS incorporates local opinions, as well as meeting Government tests of soundness, extensive consultation exercises have been conducted and will continue through the strategy's development.

The final version of the JCS is being prepared in two parts. Part 1 will include:

- An introduction to the JCS area, providing clear sense of place.
- A clear 'Vision' for how the JCS area will be in 2031 and
- 'Strategic Objectives' that must be fulfilled to achieve the Vision.

Part 2 will consist of the development strategy and policies designed (in response to the JCS evidence base and all consultation) to achieve the Vision.

Prior to writing the first part of the JCS, an *Issues and Key Questions* consultation document was published in 2009/2010, which was intended to generate debate before detailed options were developed.

Public consultation on the *Issues and Key Questions* document ran from 23rd November 2009 to 19th February 2010. The authorities then undertook a number of stakeholder consultations with Parish Councils, discussing both the *Issues and Key Questions* document and the public's response to it. The stakeholder consultation results can be found in appendix N of this report.

The second phase of consultation consisted of an online consultation on *Part 1* of the JCS document which was in response to the feedback of the *Issues and Key Questions* consultation. This focussed on the vision and objectives of the JCS and the preferred strategy. This consultation was published for eight-weeks between 14th June and 9th August 2010. A total of 76 organisations and individuals responded providing a total of 297 comments.

This report summarises the activities undertaken and the findings of the work to date, and will become part of the JCS evidence on which policy is based. The first half of the report focuses on the *Issues and Key Questions* consultation and the latter half concentrates on the *part 1* online consultation. Further stakeholder consultation will continue in parallel with the drafting of the *Developing Preferred Options Document*. The development options will be presented for public consultation in December/January 2011/2012 followed by a further *Preferred Development Option* consultation document in the summer of 2012.

2. Statements of Community Involvement / JCS Consultation Statement

The approach described and implemented complies with the Statements of Community Involvement (SCI) of all three JCS authorities, and with the JCS Consultation Statement of July 2009. The latter document can be downloaded from: <http://www.gct-jcs.org/PublicConsultation/Home.aspx>

3. Issues and Key Questions

3.1 Public exhibitions

The issues and key questions consultation consisted of a total of 17 manned exhibitions which were held across the three authorities (four in Gloucester, five in Cheltenham and eight in Tewkesbury Borough) between Monday 23rd November and Saturday 12th December 2009. To ensure good attendance, exhibition locations were chosen to cover as much of the JCS area as possible, and to include all key settlements at times convenient for the public.

Approximately 911 people attended the manned exhibitions, further details of which are provided in Appendix A. Officers in attendance answered queries, facilitated debate, and encouraged formal written/online response from visitors. Information and opportunities for interactivity were provided as follows:

- Branded banners
- Posters explaining the JCS and the nature of the consultation
- The 'Issues and Key Questions' document
- An Executive Summary of the document, presented as an A5 booklet
- A5 promotional leaflets
- Interactive A1 map of the JCS area (see section 6, below)
- Post-it notes for sharing ideas (see section 7, below)
- A4 questionnaires (see section 8, below)
- Reference map of constraints in the JCS area
- JCS database registration cards

In addition to the manned exhibitions, 25 unmanned exhibitions were held between Monday 23rd November 2009 and Friday 19th February 2010. These were held to raise awareness of the JCS and give the public a further opportunity to contribute. Unmanned exhibitions were held at university campuses, colleges, council offices and libraries. A selection of the material described above was available to read and to take away.

3.2 Publicity for the exhibitions

The JCS public consultation was publicised through the Councils' websites, the JCS website, Council magazine articles and official press notices. Letters were sent to all groups and individuals on the JCS database informing them of the consultation and how to get involved. Furthermore, letters and documents were sent to specific consultees, promotional posters were distributed to supermarkets and doctors surgeries, and the team worked with local media to generate free publicity.

Press and radio coverage included radio interviews, multiple newspaper reports, plus articles in local/parish magazines and newsletters.

Sample headlines from the Gloucestershire Echo include:

- "One voice on Gloucestershire's housing needed" – 19th November 2009
- "Have your say on future plans for Gloucester, Cheltenham and Tewkesbury" – 19th November 2009
- "Good public reaction to future plans for Cheltenham, Gloucester and Tewkesbury" – 26th November 2009
- "Have your say: Where should new houses be built in Gloucestershire?" – 27th November 2009
- "Tewkesbury Borough residents urged to have their say as exhibition moves to the town" – 7th December 2009
- "Publicity call over Gloucester housing plans" – 10th December 2009

3.3 Parish Council events

Five events were held as follows:

Cheltenham

- Monday 22nd February, 2-4pm, Municipal Offices, Pittville and Montpellier Room
- Wednesday 24th February, 5-7pm, Municipal Offices, Montpellier Room

Tewkesbury

- Tuesday 23rd February, 2-4pm, Tewkesbury Borough Council, Council Chamber
- Tuesday 23rd February, 5-7pm, Tewkesbury Borough Council, Council Chamber

Gloucester

- Thursday 4th March, 5-7pm, Gloucester City Council, North Warehouse, Committee Room 1

The five events were attended by a total of 40 representatives from 23 Parish Councils. A further 11 Parish Councils declined to attend having already submitted formal written representations to the public consultation, leaving 20 Parish Councils which did not engage with this stage of consultation.

The content and format of each of the five events was the same, reflecting the partnership approach to the JCS, though there was inevitably some local bias to discussion at each venue. Parish Councils were invited to attend the meeting geographically closest to them (regardless of Borough/City boundaries), but were welcome at any convenient event.

Each event began with an introductory presentation covering:

- The JCS context and programme
- Key issues raised during the public consultation
- Maps showing areas the public had highlighted as appropriate and inappropriate for new development (see Appendix C)
- Constraints maps for the JCS area (including the Area of Outstanding Natural Beauty (AONB), Flood Zones and Green Belt – see Appendix H).

Participants were then given more detail of public responses to the consultation, and asked to discuss and debate associated issues in a structured format based on eight themes: vision, sustainability, housing, employment, city/town centres, sustainable urban extensions, flooding and green infrastructure.

4 Part 1 – Online consultation

The Part 1 public consultation consisted of an informal online questionnaire which was published on the JCS website. Participants were given eight weeks to comment and could complete the questionnaire online or by post. The format of the questionnaire allowed respondents to answer 'Yes', 'No' or 'Other' with space below to provide further detail/comments as preferred.

The latter part of this report summarises the results of the *Part 1* consultation, in line with the five parts of the questionnaire: Spatial Portrait, Key Issues, Vision, Strategic Objectives, and general comments. This is followed by areas of common ground and disagreement.

B. Consultation event responses – Issues and Key Questions

This chapter of the report will identify the findings of the *Issues and Key Questions* consultation. Chapter B will focus on the key responses which were received whilst using interactive maps, post-it notes, short questionnaires and parish council discussions. Chapter C forms a response report to the written representations which were made.

5 Interactive maps

An A1 map of the JCS area was provided at each public exhibition, and visitors were invited to place green dots where they feel development is appropriate and red dots where it is inappropriate.

Respondents placing dots generally defined 'development' as housing, though many raised the need for supporting jobs and services too. Respondents were encouraged to 'plan positively' and put a green dot somewhere for every red dot placed (if they felt it appropriate).

The outcome of the exercise is a composite map of dots (408 green and 538 red), shown in Appendix C. At first glance, red and green dots appear to be located in the same places, but on closer analysis there are marked differences. Some of the findings from this exercise are outlined below.

- Support for development within the major urban areas, plus Highnam and Stoke Orchard.
- Opposition to development on the urban fringes including South Cheltenham, Bishops Cleeve, Tewkesbury and Northway.
- Mixed views over development in North West Cheltenham with some respondents seeing it as the best location for growth if growth must happen, while there was strong opposition to such a move from other individuals and from groups including Save the Countryside and LEGLAG.

6 Post-it notes

A total of 736 comments were collected on post-it notes across all the manned exhibitions. Respondents used the notes to share ideas and concerns, sticking them to exhibition materials in public view. The notes were logged according to their place of origin, and categorised by type. Issues raised include:

- Concern over the scale, nature and need for growth proposed by the emerging South West Regional Spatial Strategy
- Concern over possible green belt changes
- The need to maximise development and regeneration opportunities within existing urban areas
- Flood prevention
- Public transport improvements
- The need for affordable housing
- Conservation and use of open spaces
- Recommendations for the development of specific sites.

A more detailed summary of these responses is provided in Appendix D. The comments summary shows the broad range of ideas and concerns raised by the public.

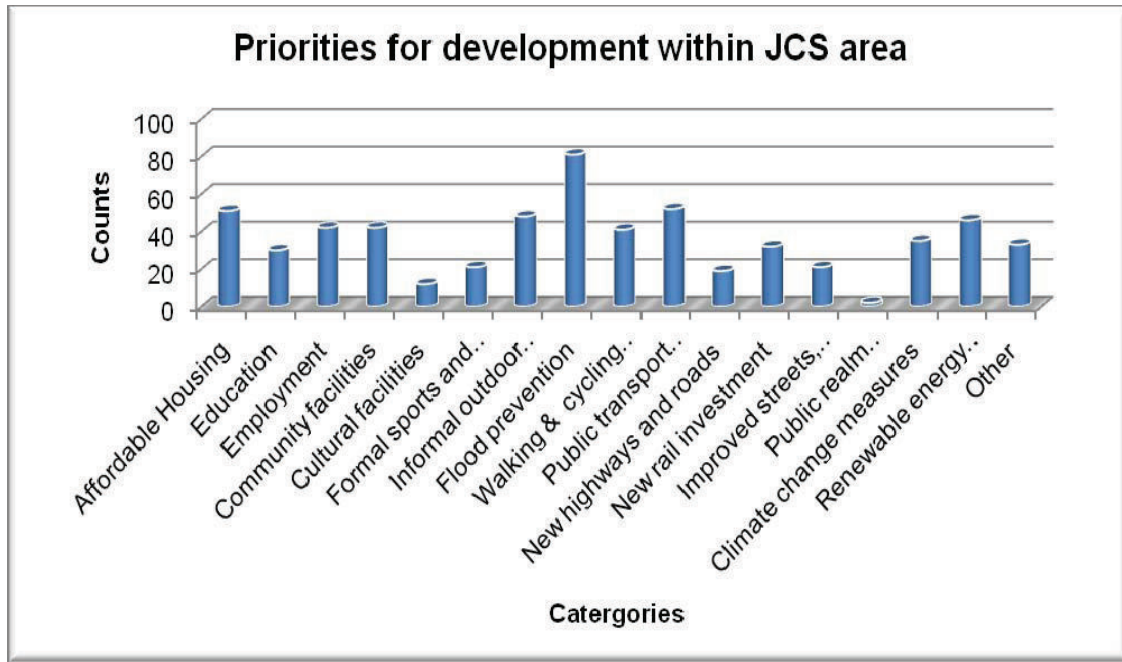
7 Short questionnaires

A short, printed questionnaire was provided at exhibitions, to capture the views of people who had an interest in the area/project. The questionnaire consisted of seven sections covering priorities for

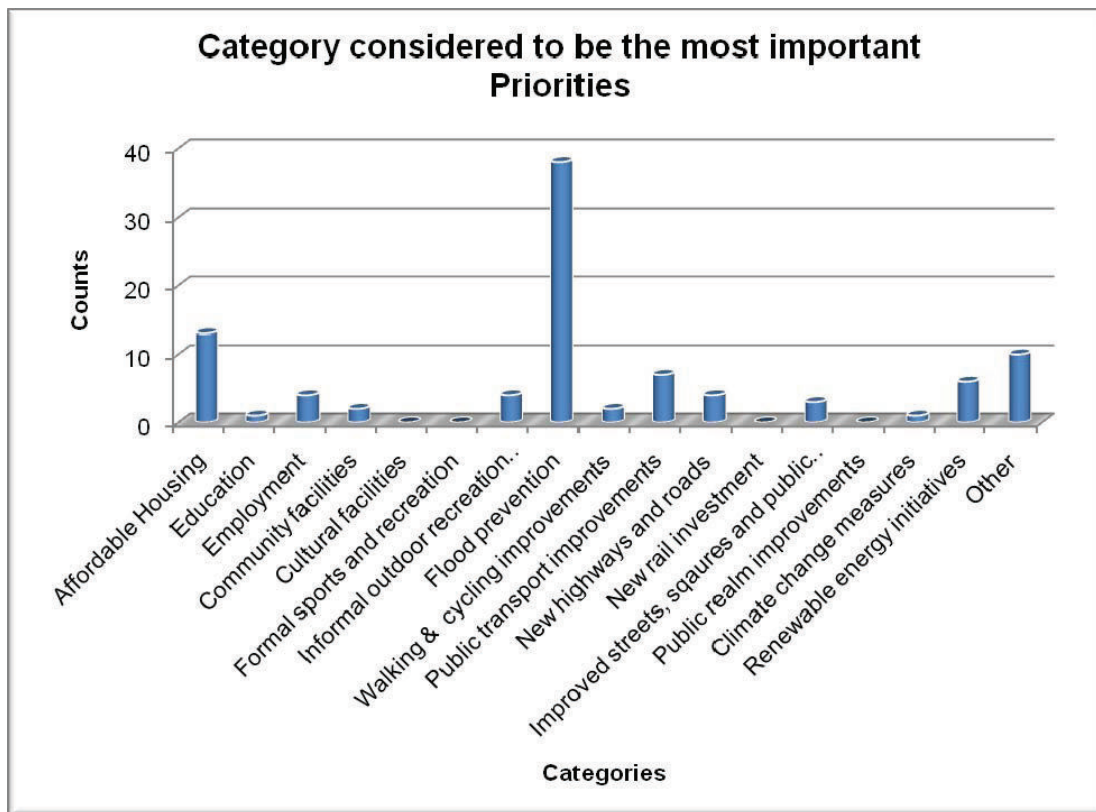
development and how and where development should be accommodated. A blank copy is provided in Appendix B.

The authorities received 110 completed questionnaires, a summary of which follows below.

Respondents were first asked to select up to six priorities for development in the JCS area. The chart below shows the number of responses for each option provided. The most common response was flood prevention with 81 votes, followed by public transport improvements, affordable housing and 'informal outdoor recreation and general open space'. Public realm improvements and cultural facilities received the fewest votes.



Respondents were then asked to choose their **top** priority from the six they identified previously. Flood prevention was the most important with 38 responses, followed by affordable housing, public transport improvements and renewable energy initiatives:



When asked whether urban areas should accommodate growth, 27 of the 110 respondents did not think urban areas should grow at all, but the majority took the view that if growth was going to happen it should be delivered by:

- Maximising opportunities within existing urban areas
- Higher density development
- Re-use of derelict brownfield sites, empty properties and council-owned sites, particularly for affordable housing.

Respondents considered that development should be near to transport routes and well-provided for in terms of infrastructure. Many respondents did not want to see development on greenfield/Green Belt sites, or sites of ecological importance, and certainly not in flood risk areas.

One respondent suggested that a small new town should be considered, and four respondents thought northwest Cheltenham could be suitable for development. It was also felt that small settlements would benefit from a limited number of additional houses, with fewer still in the smallest rural villages. Such development in rural areas was seen as helping to support the communities and their services, and providing affordable housing for young people, but without destroying the character of the area.

Respondents were asked to identify where they felt development would be suitable if it were to happen. Responses are listed and mapped in Appendix E.

Finally, respondents were asked which issues had been missed. These were identified as follows:

- Green/open spaces
- Wildlife and biodiversity
- Rural issues (including food production and public transport)
- Support for small businesses (including tourism) and encouraging sustainable commercial development
- Facilities for children and teenagers
- Design of new development (e.g. low energy housing and adaptability of housing to accommodate changing lifestyles)

- Health and community aspects, such as tackling poverty and deprivation
- Parking (including for lorries)
- Gypsy and traveller pitches
- Sustainable transport initiatives e.g. car clubs

8 Parish Council discussions

Parish Councillors attending the events endorsed the issues raised by the public and debated their own priorities. A separate report was written on the Parish Council events which is included in Appendix G. In addition, a short summary appears below:

Vision

- Focus on local community needs, not just regional housing targets.
- Protect the environmental, rural and urban characteristics that make the JCS area (and the separate and distinctive places within it) an attractive place to live and work.
- Address rural and urban areas/issues in a balanced way.
- Encourage sustainability/green living and prepare for climate change.

Sustainability

- Create integrated, self-sufficient communities.
- Maintain local and rural services.
- Support local food and green energy production.
- Improve energy efficiency of existing housing stock and new-build.
- Provide sustainable transport options including public transport and cycle routes.

Housing

- Concern was expressed over the scale and nature of housing need in the RSS.
- Use previously-developed land as a priority, and bring empty properties back into use.
- Link new housing provision to job creation.
- Provide adequate levels of affordable housing, including intermediate ownership schemes, within existing settlements not just urban extensions.
- Ensure new housing is: energy efficient; of high quality design and space standards; and planned to create mixed/balanced communities.

Employment

- Foster local specialisms, and develop a skilled local workforce.
- Balance manufacturing and service industries (including green / high-tech).
- Support agriculture and farm diversification.
- Provide incubator units for new businesses.
- Encourage home-working – e.g. through broadband provision.

City and town centres

- Regenerate/improve Cheltenham, Gloucester and Tewkesbury centres.
- Provide a better mix/range of quality chain stores and independent shops/markets supported by attractions other than retail (e.g. festivals, culture) and good quality public spaces.
- Halt out-of-centre retail development.
- Provide better access by public transport from rural areas. Promote pedestrian/cycle access and movement. Support well-placed park and ride schemes. Address parking costs.
- Make better use of vacant shop units, and empty properties above shops.

Sustainable urban extensions

- Concern was expressed over the form, location, need and evidence for urban extensions.
- Protect the Green Belt and avoid coalescence of settlements. Re-use brownfield sites and empty buildings before greenfield sites.
- If development does go ahead, ensure it provides adequate social, physical and transport infrastructure to support itself, as well as addressing existing local deficiencies and flood risk.

Flooding

- New development must not increase (and should reduce) flood risk to existing properties.

- Flood zones should be defined with a margin to account for climate change, and should incorporate local knowledge. There should be no building on the defined floodplain.
- Flood risk assessment and flood defences must account for both fluvial and pluvial flooding.

Green infrastructure

- Protect the AONB, Green Belt, woodlands, productive agricultural land, playing fields, allotments, disused railways, parks and open spaces etc.
- The Green Infrastructure approach was endorsed: connecting and managing all green spaces for free access and multi-functional use by all.

C. Issues and Key Questions: Written representations and JCS responses

The 'Issues and Key Questions' document was available online throughout the consultation period, allowing comments to be submitted interactively. People were also able to respond by letter or email, with hard copies of the document sent to Parish Councils and made available to view at deposit locations across the three authority areas.

When the consultation period closed on 19th February 2010, responses had been received as follows:

- Online – 28
- Email – 181
- Post – 163
- In addition, 380 letters and forms were received in connection with campaigning by Save the Countryside and Leckhampton Green Land Action Group (LEGLAG).

Together, these responses add up to more than 2,500 representations on individual topic areas – the exact number is impossible to quantify due to the inter-related nature of issues raised. All the representations are summarised in sections 10 to 22, below.

PLEASE NOTE BEFORE READING:

Methodology

A qualitative approach was adopted for the analysis in an effort to present a balanced view of the diverse opinions expressed, highlighting areas of agreement and conflict. The report has extracted these issues for discussion.

Sources

All representations are reported anonymously. Each of these individual responses are an overview of the main points which have been raised to those questions asked.

Regional planning

As noted on page 6, this report was written when significant questions remained unanswered on regional planning, the emerging South West Regional Spatial Strategy, and Regional Planning Guidance 10. The new coalition government has promised major changes to regional planning and the planning system as a whole, but has not yet clarified details of the new regime. Such changes will of course be considered as they become clear throughout the development of the JCS. In the meantime, this document reports on issues associated with regional planning and the RSS as they were raised by respondents. More recently, the government have published the National Planning Policy Framework (NPPF) which is subject to public consultation and is expected to be formally adopted by April 2012. The NPPF will replace planning policy guidance and planning policy statements. The JCS will address the NPPF as it evolves following public consultation.

Transport, waste and education

Transport, waste management and education are the responsibility of UK county councils, and are outside the remit of district authorities and the JCS. Accordingly, these issues are not specifically addressed below, but are discussed under related sections (such as 'Housing' or 'Urban and rural issues') for which the JCS does have responsibility.

Representations made to the JCS on county responsibilities have been shared with Gloucestershire County Council. Indeed, the JCS authorities worked closely with the County Council in supporting their parallel development of the Strategic Infrastructure Delivery Plan (SIDP). The purpose of SIDP was to assess transport, education, health care and a wide range of other infrastructure issues, resulting in a costed schedule of requirements for incorporation in local Development Plan Documents. Whilst completion of SIDP was prevented by the government's decision to revoke Regional Spatial Strategies some of the basic work undertaken has been helpful in informing development of JCS preferred options for consultation. Further information on the SIDP can be found here:

<http://www.gloucestershire.gov.uk/index.cfm?articleid=95428>

9 Direction and content of the JCS

Respondents, including members of the public, statutory consultees, the Local Strategic Partnership (LSP) and the development industry, all expressed support for the principal of joint working between the three JCS authorities.

There was general agreement among respondents calling for the JCS to:

- Facilitate development that makes a positive contribution to the local environment, economy and community. Support and create sustainable, self-sufficient communities.

Officer response:

Agree – The JCS will work towards creating new sustainable communities.

- Protect the environmental, rural and urban characteristics that make the area (and the separate and distinctive places within it) a unique and attractive place to live, work and visit.

Officer response:

Agree – The unique character of the JCS area has been taken fully into consideration when identifying strategic new development areas within the JCS.

- Address rural and urban areas/issues in a balanced way.

Officer response:

Noted – The need for development in the JCS area is predominantly driven by population growth from within the urban areas. Growth within the rural areas is proposed by the JCS however the focus of new housing and employment development will be adjacent to the existing centres.

- Avoid focusing on land-use planning and urban regeneration to the detriment of social issues such as healthy lifestyles, educational attainment, community safety/crime/fear of crime, affordable homes for everyone, and meeting the needs of an ageing population.

Officer response:

Noted – these issues are taken into consideration by Sustainability Appraisal in order to ensure that new development takes into consideration social, economic and environmental factors. More detailed policies in the Preferred Options document will address these issues.

- Address inequalities in wealth, housing, education, employment and infrastructure provision.

Officer response:

Agree – New development across the JCS area will help provide more affordable housing, and more employment land thereby helping to reduce inequalities with regard to access to housing and employment. Developer contributions to public transport, highway infrastructure and education will also be sourced from new development.

- Support the shift to a low-carbon economy.

Officer response:

Agree – The JCS will promote sustainable development and support the shift to a low carbon economy.

- Encourage sustainability/green living and prepare for / adapt to / mitigate climate change, for example by: addressing flood risk; supporting appropriate renewable energy production; supporting local and community food production; minimising the need to travel and promoting sustainable transport options.

Officer response:

Agree – The proposed JCS Strategic Sites have all been selected for their ability to contribute to the aforementioned outcomes.

- Provide for high design standards in all new development, regeneration and refurbishment, from major projects to street furniture.

Officer response:

Noted - More detailed policies in the Preferred Options document and subsequent JCS authority Local Plans will address strategic design issues..

- Collaborate with neighbouring authorities at all scales (local, county and regional).

Officer response:

Agree – Neighbouring authorities within the County have been partners in econometric modelling. Out of county neighbours have been included in ongoing consultation.

- List all evidence and source documents.

Officer response:

Agree – This can be found on the JCS website

There was a marked split in opinion on housing provision (discussed in detail in section 14, Housing) with many respondents calling for the JCS to:

- Focus on local community needs, not just regional housing targets, and ensure a balanced approach to provision of employment, housing and social infrastructure.

Officer response:

Noted - The housing need figures have been produced from local population projection work and the Gloucestershire Affordability Model will be used to ensure housing and employment provision are balanced accordingly

- Protect environmental designations and restrict urban sprawl.

Officer response:

Agree – The strategic development sites identified seek to safeguard other areas that are subject to statutory nature conservation or high levels of landscape sensitivity. Urban sprawl is restricted by providing development at several sites around the existing main centres in a plan led approach rather than in an unplanned manner. Plan led growth is not urban sprawl.

- Direct development to brownfield sites before Greenfield.

Officer response:

Noted: In order to secure a mix of types and tenures of dwelling units and employment accommodation it will be necessary to provide greenfield land alongside the continued promotion of central regeneration sites.

However, the development industry called for the JCS to:

- Adhere to the growth projections in the emerging South West Regional Spatial Strategy (the RSS) such that new homes are provided to satisfy the demands of the current and future population “to support greater economic prosperity and address housing affordability”.

Officer response:

Noted: With the Coalition Government abolishing the RSS development requirement numbers have now been determined locally. Locally derived projection outputs are not dissimilar to RSS projections. A wealth of work has been undertaken by the JCS authorities to identify the most sustainable locations for strategic growth. Proposed strategic sites have emerged therefore from the culmination of much locally based evidence and research work.

- Provide for such growth in a sustainable and deliverable way, acknowledging the need to review the Green Belt.

Officer response:

Agree: An independent Green Belt Review has been carried out to inform the Developing Options Preferred Consultation and comprises part of the evidence base. All strategic development sites identified are considered to be the most sustainable and deliverable options. Further assessment of the Green Belt will be undertaken to establish whether additional development can be accommodated within the Green Belt areas.

10 Strategic objectives

Thirteen strategic objectives for the JCS were listed in the consultation document (see Appendix I) and were generally well-supported by respondents. Various specific text edits were recommended in line with issues described in section 10 (above) and throughout this document. General and conceptual criticisms of the strategic objectives were raised as follows:

- All objectives should be: specific, measureable, achievable, relevant and set within a time frame (SMART). The respondent suggested that the strategic objectives as currently drafted would fail these tests, appearing to be “a re-statement of the issue and vision”.

Officer comment:

Agree – JCS objectives are currently being developed in this manner.

- The objectives restate the requirements of the RSS and then suggest unrealistic options that include ignoring the requirements of the RSS.

Officer comment:

Noted. Development requirements within the JCS area have been identified by using local data sources in the knowledge that the RSS is proposed to be abolished.

- The objectives do not focus sufficiently on the key issues (as required by Planning Policy Statement 12): the economy, jobs and housing need.

Officer comment:

Agree – JCS objectives have been reviewed accordingly.

- Biodiversity should be protected, managed and enhanced for its own sake: a Green Infrastructure Strategy is not the only way of doing so. The development of increased access to green spaces is a separate issue which requires its own objective. Furthermore, the JCS must provide for the recreation of lost wildlife habitats, in addition to conservation.

Officer comment:

Agree – JCS objectives have been reviewed accordingly.

- Strategic objective 3 received the greatest level of criticism; it appears in the consultation document as follows:

“If the Regional Spatial Strategy for the South West is published it will be necessary to meet its requirements in the provision of new homes that meet the variety of housing needs across the Joint Core Strategy area and, in particular, ensuring that the provision of new homes facilitates the attraction and retention of skilled people to ensure economic growth.”

Criticism of this objective was addressed as follows:

- The language and tone used is negative and defensive. The objective should be framed positively and should set as an objective the delivery of sufficient new housing to meet the needs of the expanding population and ensure greater affordability for all sectors of the community. The JCS should support the delivery of housing in order to meet the needs of the area (as quantified through solid evidence), and should not imply that the delivery of new housing is a forced obligation through the RSS.

Officer comment:

Agree – Development requirements within the JCS area have been identified by using local data sources in the knowledge that the RSS is proposed to be abolished.

- Unqualified support for undifferentiated economic growth is not always a good thing – rather there should be a proper understanding of what genuinely sustainable economic development will mean.

Officer comment:

Noted.

Additional strategic objectives were suggested for consideration as follows:

- To safeguard the strategic resource of best and most versatile agricultural land, by avoiding development on all land used for agriculture and by restoring land which has fallen into disuse.

Officer comment:

Agree – JCS objectives have been reviewed accordingly.

- To promote, protect and enhance the vitality and vibrancy of the area's city and town centres.

Officer comment:

Noted. This will be part of the strategy with Gloucester Heritage Urban Regeneration Company and Cheltenham Development Taskforce support.

- To seek delivery of additional renewable energy generation capacity in the JCS area.

Officer comment:

Noted. The JCS recognises the threats from Climate Change and will address this within the strategy.

- To provide a sufficient quantity and range of housing to ensure that local needs and demands are met throughout the plan period.

Officer comment:

Noted. Development requirements within the JCS area have been identified by using local data sources.

- To direct development to locations which can best deliver sustainable development having regard to accessibility, the availability of infrastructure and the absence of strategic constraints.

Officer comment:

Noted. This is dealt with by a number of objectives in terms of sustainability.

- To secure the comprehensive regeneration of vacant/underused brownfield land (as opposed to the sites being tested simply as opportunities to deliver a given quantum of housing or employment).

Officer comment:

Noted. Urban regeneration initiatives are already being promoted through Gloucester Heritage Urban Regeneration Company and Cheltenham Delivery Taskforce.

- To provide safe walking or cycling to a wide range of shopping, employment and community facilities as a key element of a sustainable, low carbon future.

Officer comment:

Noted. This is dealt with by a number of objectives in terms of sustainability.

11 Vision and priorities for the JCS area

Respondents suggested that the JCS area, its residents, workers and visitors should enjoy:

- A high quality of life with improved open spaces, education, health and leisure, plus high public safety and low fear of crime.

Officer comment:

Agree

- Thriving rural and urban communities, engaged with planning their own futures.

Officer comment:

Agree

- Protection from flooding, and the mitigation of flood impact.

Officer comment:

Agree

- A mixed economy (agriculture, manufacturing and services), and a highly-skilled workforce attracting inward investment.

Officer comment:

Agree

- Affordable, well-designed housing for all – urban and rural – in mixed communities with good access to services and employment.

Officer comment:

Agree

- Good road/rail infrastructure and traffic management, plus better public transport, walking and cycling routes.

Officer comment:

Agree

- Good access to the countryside and green spaces.

Officer comment:

Agree

Respondents pointed out that the strategic vision should reflect the respective Sustainable Community Strategies and Community Safety Strategies of the three authorities. Many respondents also

suggested that the overall strategic vision should be complemented by separate visions for specific places/areas in response to the diversity of issues at different locations. For example:

- Gloucester's vision may centre on urban regeneration;
Officer comment
Noted and a revised version of the vision will address this point.
- Cheltenham's vision may centre on finding an acceptable suite of provisions to meet housing and employment needs; and
Officer comment
The revised vision will look at separate parts of the JCS area but not down to the level of individual settlements outside of the main centres
- Tewkesbury's vision may centre on improving its attractiveness as a historic market town.
Officer comment
Noted
- A specifically-rural vision was suggested (in response to criticisms of its absence) as follows:

Some respondents suggested separate visions are also required in areas targeted for growth by the RSS, for example Bishops Cleeve.

Respondents were asked to give their priorities for delivery through development. Many respondents criticised the use of prioritised lists, highlighting the interdependency of items likely to appear on them; citing site-specific variations and the need to consider sites individually; and querying the definition of 'development' in this context. Other respondents suggested the single priority is to meet the development requirements of the RSS. In acknowledgement of these criticisms, the following development outcomes are identified (in no particular order) as of greatest interest to respondents:

- Flood protection and mitigation
- Affordable housing
- Social/community facilities and infrastructure (including education)
- Sensitive regeneration of town and city centres
- Employment
- Climate change adaptation and mitigation measures
- Renewable energy initiatives
- Public transport
- New roads and highways
- Walking and cycling improvements
- Public realm improvements
- Formal and informal open and recreational space
- Community safety
- Waste reduction and management

Officer comment

These are all legitimate issues which need to be considered in the preparation of the JCS. All of the potential scenarios to be presented as options will be tested against a wide range of sustainability and strategic objectives, including those in the list above.

12 Sustainability

There was support for the JCS leading the way in preparing for and mitigating the impact of climate change. Respondents indicated that the JCS should address social, economic and environmental sustainability (known as the 'three pillars of sustainability'). Many respondents showed a good understanding of the need to incorporate sustainability into all aspects of the JCS, and not to view it as an 'add-on'. Accordingly the three pillars inform all of the sections in this chapter, but some specific comments are highlighted here with respondents calling for the JCS to:

- Avoid urban sprawl and the accompanying loss of productive land, loss of amenity space, increased traffic congestion and pollution, increased flood risk, and the negative impact on the Cotswold Area of Outstanding Natural Beauty (the AONB). Many respondents highlighted our responsibilities to future generations in this respect.

Officer response:

Noted – The JCS seek to protect these designations wherever possible.

- Maintain local and rural services – including through the development of new housing, services, community facilities and wider infrastructure at an appropriate scale to existing settlements.

Officer response:

Agree – Moderate development in rural areas can help to retain rural services.

- Support local food production – including through vegetable-growing schemes, provision of allotments, support for local shops/farmers, and preservation of productive agricultural land (preventing development on 'best and most versatile' (BMV) agricultural land: grades 1, 2 and 3a). Many respondents expressed concern over future food security in the UK and the corresponding need to preserve agricultural land.

Officer response:

Agree – The JCS will seek to protect high quality agricultural land to enable local food production to continue.

- Design to reduce energy consumption, and support local green energy production through:
 - Conducting a Renewable Energy Viability Assessment
 - Micro-generation
 - Hydro power
 - Solar and photovoltaic power
 - Air and ground source heat pumps
 - Geothermal power
 - Biomass boilers and use of woodfuel in association with woodland management
 - Combined heat/power plants
 - Energy-from-waste
 - Setting targets for renewable energy production on new developments (e.g. 70%). This approach was opposed by some who recommended that the JCS seeks a reduction in *overall* carbon emissions rather than focusing on one approach.
 - Most respondents advocated the “measured proactive” approach described in the consultation document (as opposed to “business as usual” or “very proactive” options), however this was criticised by energy professionals as an artificially constructed middle-ground with no basis in policy.
 - Several respondents highlighted the potential employment benefits of green technologies and energy production – see section 15, Employment.
 - There were mixed views on the need for and impact of wind turbines and the proposed Severn Barrage. There is a clash in many respondents’ high prioritisation of renewable energy initiatives and their reluctance to accept intrusive projects.

Officer response:

The JCS will ensure that strategic developments are designed to reduce energy consumption and support local green energy production.

- Improve the energy efficiency of existing housing stock and new-build. Many respondents called for the JCS to consider setting targets beyond those of central government policy and building regulations. However, the development industry highlighted the ambitious nature of targets already set, the need to consider viability, and the statutory requirement for any departure from national policy to be justified by evidence (in this and other areas of concern).

Officer response:

Noted: The JCS will have a duty to respond to national targets; therefore local targets are most likely not be set. The national planning policy framework encourages authorities to consider the viability of developments when determining applications, therefore, exceeding government sustainability targets could potentially make developments unviable.

- Reduce the need to travel and provide sustainable transport options including public transport and cycle routes/parking – but the JCS must acknowledge the likely continued dominance of the private car in rural areas. Concern was expressed for the Councils’ failure to enforce corporate green travel plans, and for the expense of using local park and ride schemes.

Officer response:

Noted.

- Create integrated, self-sufficient and sustainable communities through a combination of all the above and other initiatives.

Officer response:

Agree – the broad locations will be located in sustainable locations which will provide new infrastructure whilst improving existing provisions.

13 Housing

Housing was a dominant theme of discussions, with many respondents being well-informed about housing issues arising from the emerging South West Regional Spatial Strategy (RSS). Many respondents expressed significant objections to the scale and nature of new housing proposed in the RSS, but concern was also raised for housing affordability (in both rural and urban areas) with a corresponding acknowledgement of the need to accommodate demand through appropriate housing construction, balanced with initiatives to bring empty properties back into use. Many respondents expressed a strong preference for brownfield development before greenfield.

Many rural residents expressed concern for the young being priced-out of villages (resulting in divided families and aging rural populations), and for the limited opportunities to provide affordable housing in many villages. This was seen as resulting from: the lack of social infrastructure and employment in villages; the view that villages are not sustainable locations for new housing; and the fact that new affordable housing is usually provided in conjunction with new market housing, suggesting a scale of development that conflicts with many village residents' idea of what is acceptable growth.

Respondents called for the JCS to:

- Provide housing types and numbers to suit current and projected local need, not central Government targets – this to include housing for the elderly and young families for example.

Officer response:

Agree – Local household projections have been produced in order to determine the amount and type of housing to come forward over the plan period.

- Determine local housing need and secure community buy-in, for example by encouraging Parish Councils to conduct housing needs surveys to determine the target population for affordable housing and the number of units needed.

Officer response:

Noted – Rural communities will have the opportunity through the Developing Preferred Options Consultation to identify whether they could accommodate growth.

- Link new housing provision to job creation.

Officer response:

Agree – Identified strategic sites in the first 10 years of the plan period will provide employment as well as housing land

- Adopt a sequential approach, first bringing empty properties back into use (e.g. above shops), then focusing new housing provision on brownfield sites (prioritising urban areas while allowing limited development in villages). Respondents who acknowledged a need to include some greenfield development suggested it must only occur on the most sustainable sites, and must be phased to avoid undermining the preferred delivery of housing on brownfield sites (see also section 18, Deliverability and phasing). Many respondents opposed the development of private gardens for housing, while others viewed such sites as sustainable (being close to services) but requiring stringent design standards if developed.

Officer response:

Noted – For the first 10 years of the plan (2011-2021) it will be necessary to release green field sites while simultaneously promoting brownfield regeneration in central areas in order to provide a mixed supply of type and tenure of housing

- Manage affordable housing provision by setting evidence-based thresholds and targets (with a defined split between social rented and shared equity). Respondents suggested thresholds between two and 15 (to include both new build and conversions), and targets between 35% (in line with the RSS) and 50%. Several respondents suggested setting site-specific figures, or varying figures according to settlement type and size in line with guidance from the Campaign to Protect Rural England (CPRE) – e.g. thresholds may be lower in rural than urban areas, and selected rural sites may be allocated for 100% affordable housing, or market housing may be limited (as in Cotswold District). Several respondents highlighted that the JCS will outlast the economic downturn and called for high and defensible targets/thresholds in spite of developers' likely viability objections.

Officer response:

Noted – The JCS will contain evidence based thresholds with regard to affordable housing requirements, this will include strategic sites.

- Support intermediate ownership schemes and key worker housing.

Officer response:

Noted – Increasing the supply of housing across the JCS area will help to improve access to affordable accommodation for all.

- Ensure new housing is: energy efficient; of high quality design and space standards (e.g. Lifetime Homes and/or standards set by the Commission for Architecture and the Built Environment and the Royal Institute of British Architects (CABE/RIBA)); secure by design; in keeping with local character; of higher density in urban areas; and planned to create mixed/balanced communities.

Officer response:

Agree – In order to be sustainable it will be necessary for new development to comply with rigorous design requirements. It is intended that the JCS will include policies on sustainable development and design.

- Ensure developers demonstrate adequacy of infrastructure on and adjacent to development sites, such that existing residents will not suffer adverse impacts of growth. Where an adverse impact is shown, developers should fund infrastructure upgrades accordingly.

Officer response:

Noted – Currently developers contribute to site related infrastructure through S.106 legal agreements. This may be replaced by a Community Infrastructure Levy across the JCS area. The need to ensure not only physical infrastructure but community infrastructure requirements are met is noted. Each planning authority will negotiate relevant contributions through the planning process based on evidenced need.

- Ensure major new developments are assessed and provided for in terms of accessibility to acute hospital services (Gloucestershire Royal and Cheltenham General Hospitals) and the impact placed upon them in terms of increased patient numbers and distances travelled.

Officer response:

Noted – All strategic sites for the first 10 year period of the plan lie adjacent to the existing urban centres, further consultation with the NHS Trusts will ascertain response times and anticipated increase in patient numbers.

- Provide affordable housing within existing settlements, not just urban extensions. This should include provision of appropriate new housing and supporting development in villages and rural areas.

Officer response:

Noted - New housing in JCS rural areas will be required to provide affordable units as identified by evidenced local need.

- Address issues arising from high levels of second home ownership.

Officer response:

Noted – This matter is not within the remit of the Joint Core Strategy although an allowance for second home ownership is made within the housing projection work.

- Provide adequate, specialist homes for the elderly, to free-up larger homes for families.

Officer response:

Noted – Where evidence points to the need for provision of specific types of accommodation the JCS will seek to provide a policy response.

- Ensure no new housing is built adjacent to waste processing facilities.

Officer response:

Agree – The impact of constraints such as cordon sanitaires has been carefully considered in the process of identifying strategic sites for new development.

- Ensure adequate provision of children's play space in all new developments – e.g. in line with guidance from Play England's document, Better Places to Play Through Planning.

Officer response:

Agree – The provision of public open space in new strategic sites will be negotiated through the development process in accordance with the POS standards of each local authority. It will also be informed by emerging green infrastructure work.

Many members of the development industry indicated agreement with the public's suggestions regarding mixed communities and the design of new housing. Some also suggested varying affordable housing targets by site, according to local need/conditions/settlement type. However, there was a marked divergence in views on other matters. Developers highlighted the statutory requirement to consider viability in setting affordable housing targets and thresholds (PPS3, paragraph 29), and for flexibility (PPS12, paragraph 4.46), and called for the JCS to:

- Comply with national and regional planning policy, accommodating housing targets in the emerging RSS, and including an evidence-based Green Belt review to ensure delivery of sites to meet housing need (over-reliance on brownfield land being seen as a restriction on choice, viability and delivery).

Officer response:

Noted – It has been necessary, owing to the proposed abolition of the South West Regional Spatial Strategy to determine housing numbers locally. A Green Belt Review has been undertaken to inform the developing preferred option consultation and is available to view on the JCS website. A further Green Belt Review is planned.

- Provide a simple, flexible and transparent affordable housing policy, establishing a base level of provision and a set of circumstances where, if proven, the level of provision can be reduced with reference to viability.

Officer response:

Noted – Please refer to the above Affordable Housing statement

- Avoid site-specific affordable housing targets.

Officer response:

Noted – Please refer to the above Affordable Housing statement

- Balance affordable housing targets with the cost of other Section 106 priorities (e.g. education, emergency services).

Officer response:

Noted - S.106 contributions are negotiated on a site by site basis between the local authority and developer. The commercial viability of a scheme may be cited as a reason to reduce requested S.106 contributions. Local authority's can undertake their own assessments of the viability of schemes to challenge evidence presented by developers. It will be for each local authority within the JCS area to determine the level of contributions sought owing to issues presenting on a site by site basis.

- Set a threshold for affordable housing of 15 units in line with PPS3.

Officer Response:

Noted – The affordable housing threshold across the strategic sites adjacent to main urban areas will be informed by the Strategic Housing Market Assessment (SHMA) which has been produced by Gloucestershire County Council working with the 6 authorities within the County. The report forms part of the JCS evidence base and can be used to assess housing need and demand in order to develop policies.

- Provide for phased development of both brownfield and greenfield sites in acknowledgement of changing economic conditions during the plan period, and of the need to provide a range of housing sizes, types and tenures.

Officer response:

Noted – For the first 10 years of the plan (2011-2021) it will be necessary to release green field sites while simultaneously promoting brownfield regeneration in central areas in order to provide a mixed supply of type and tenure of housing. Exact phasing arrangements will be set out in the preferred options document in 2012.

- Include a viability assessment of affordable housing targets as part of the evidence base.

Officer response:

Noted - A Viability Assessment will be undertaken for the JCS as a whole which will incorporate affordable housing viability.

- Include a robust series of site allocations to be tested through the examination process.

Officer response:

There is a hard focus on the first 10 years of the plan period with regard to identifying strategic sites for development in the JCS area.– For the first 10 years of the plan (2011-2021) it will be

necessary to release green field sites while simultaneously promoting brownfield regeneration in central areas in order to provide a mixed supply of type and tenure of housing. The development industry has been consulted with regard to the strategic suites proposed as well as on the Strategic Housing Land Availability Assessment which looks at potential sources of land for housing supply across each JCS authority. It is therefore considered that the strategic sites selected for the first ten years are robust and satisfy the tests of availability.

See also section 18, Deliverability and phasing, below.

The consultation sought respondents' views on provision of sites for Gypsy and Traveller accommodation. Respondents called for the JCS to:

- Ensure adequate provision of sites over the whole plan period with consideration of viability and deliverability.

Officer comment:

Noted - the JCS will identify and assess potential sites for the gypsy and traveller community as part of strategic allocations, having regard to both viability and deliverability.

- Strike a balance between the needs and reasonable expectations of the settled community and local businesses, and the needs and aspirations of Gypsies and Travellers.

Officer comment:

Agreed. The JCS will aim to balance and provide for the needs of all communities.

- Encourage full use of any under-utilised existing sites (e.g. by refurbishment), then consider extension of these sites where appropriate.

Officer comment:

Noted. When planning for additional gypsy and traveller sites in the JCS area regard will be to the level of local need, based on an understanding of existing site provision and estimated future needs.

A specific, targeted 'call for sites' for gypsy and traveller sites was undertaken between September and November 2010 whereby local communities and landowners were invited to submit sites for consideration for residential sites for the gypsy and traveller community. Moving forward, the 'call for sites' is ongoing and runs from April to March of the next year. This will provide the opportunity for the submission of potential sites for assessment, including extensions to existing sites, on an annual basis.

- Encourage the use of vacant or unused land owned by local authorities. Make full use of the registers of unused and under-used land owned by public bodies. Exercise discretion in disposing of land for less than best consideration as set out in ODPM Circular 06/03.

Officer comment:

Comment noted.

- Provide a number of smaller sites (10 pitches or less) rather than concentrating provision in large sites or in one area.

Officer comment:

Agree. Officers are aware that some traveller communities prefer to live on smaller sites of around ten pitches. Regard will be had to this when identifying and assessing potential sites for traveller communities, in consultation with representatives from the gypsy and traveller communities.

- Develop brownfield sites before greenfield, avoiding sites at risk of flooding (due to the particular vulnerability of caravans).

Officer comment:

Agreed. The JCS (and other development plan documents) will encourage the development of brownfield land before greenfield land wherever possible. In relation to flood risk, a sequential approach to site identification will be applied for different uses, in accordance with Planning Policy Statement 25 'Development and Flood Risk'.

- Ensure good local access to schools, doctors and other essential services to reduce the need for long distance travel.

Officer comment:

Agreed. Site identification through the JCS (and other development plans) will have full regard to sustainability objectives as set out in Planning Policy Statement 1 'Delivering Sustainable Development'.

- Consider sites within or adjacent to (on the periphery of) sustainable urban extensions (SUEs). However timing of delivery must be considered as delivery of the SUEs is uncertain and if permitted will be a long way off. Circular 1/2006 (paragraph 12 c) requires authorities to address under-provision in a 3-5 year period, meaning urban extensions should be reserved only for future needs and growth.

Officer comment:

Noted. The JCS will consider the inclusion of sites for the traveller community as part of sustainable urban extensions. It is likely that other, smaller scale site provision will be made through other development plan documents to be prepared by the individual authorities.

- Prevent the purchase of farm land by Gypsies and Travellers for permanent occupation.

Officer comment:

Comment noted. Planning authorities cannot dictate who purchases land on the open market. They can however ensure that proposals for sites for the traveller community are assessed against relevant planning policy to ensure they are located in the right location, and developed in the right manner, protecting the amenities of neighbouring uses.

- Ensure sustainable foul drainage infrastructure is provided. Consider Circular 03/99: Planning requirement in respect of the Use of Non-Mains Sewerage incorporating Septic Tanks in New Development.

Officer comment:

Agreed. JCS consultations are undertaken in accordance with the agreed JCS 'Consultation Strategy' and will include full and proper consultation with gypsy and traveller communities.

- Ensure consultation with Gypsies and Travellers is direct and accessible in line with paragraph 27-29 of Circular 1/2006. Representative bodies (e.g. Friends and Families of Travellers, and the Traveller Law Reform Project) can give their opinion but such responses are not sufficient to satisfy needed community involvement.

Officer comment:

Agreed. JCS consultations are undertaken in accordance with the agreed JCS 'Consultation Strategy' and will include full and proper consultation with gypsy and traveller communities.

- Consider producing a joint dedicated Gypsy and Traveller Development Plan Document (DPD).

Officer comment:

Comment noted. This is not something that is being considered at this time. It is envisaged the JCS and other development plan documents will be the vehicle for identifying a future supply of sites for gypsy and traveller communities, based on an understanding of local future need.

- Incorporate Site Grant Guidance (Homes and Communities Agency, Jan 2009).

Officer comment:

Disagree. It would be inappropriate for the JCS to contain detailed guidance in relation to the Gypsy and Traveller site grant guidance.

14 Employment

Many respondents were more concerned about jobs than housing given the current economic downturn, with several highlighting a historic deficit in provision of employment land across the area (and particularly in Cheltenham). Similarly, many respondents were critical of the emerging RSS claiming it focuses on housing at the expense of employment. Respondents called for the JCS to:

- Develop a skilled local workforce and reduce the need to import skills: focus on education, targeted at the needs of current and future local employers.

Officer response:

Agree – The JCS provides for inward investment in the area therefore providing confidence for local employers to invest in the skill base of existing and new employees. Beyond the JCS, future

work developing development management policies can also look at other means of promoting the local workforce through e.g. local labour agreements and training schemes tied to a planning consent.

- Provide adequate and appropriate land for employment uses, in balance with housing provision across the area, allowing people to live near where they work (while understanding that this is not always possible and some people will/must commute).

Officer response:

Agree – Employment land at Gloucester, Tewkesbury and Cheltenham is proposed to be included within the strategic development sites.

- Provide sufficient, suitable and appropriate employment land for modern businesses, to meet a range of employment needs including: rural workshops, starter units, intermediate units, general employment sites suitable for a range of businesses, plus larger sites to attract major inward investment to the area. Recognise that many land uses can deliver economic development and job creation, not just those in the B-classes (business, general industrial and storage/distribution).

Officer response:

Agree – A mixture of types and sizes of units is desirable but also so is a focus on flexibility so that units can be reconfigured or put to alternative employment uses more easily. The evidence in the Employment Land Review confirms that there are a number of sectors beyond the B Class uses which will contribute even more to overall employment levels in future.

- Provide a dispersed pattern of employment, balanced between urban and rural areas as follows:
 - Meet the needs of major employment key sectors at or adjacent to Gloucester, Cheltenham and Tewkesbury/Northway.
 - Provide more limited allocations for employment uses in rural areas.

Officer response:

Partly Agree – Employment provision across the whole JCS area should be promoted wherever practicable but any dispersal must be sustainable and avoid inappropriate large scale developments that would attract high volumes of commuting in remote rural locations.

- Adopt a sequential approach to employment development (as recommended for housing, section 14), prioritising accessible, serviced brownfield sites in the main urban areas over greenfield development on the edge of town.

Officer response:

Agree – A sequential approach is sensible and making use of existing brownfield sites is favoured. However, there may be instances where some employment provision is required outside of the existing centres e.g. to support housing development which may be occurring away from a town centre location.

- Protect environmental and heritage assets (in their own right, but also as the foundation of the tourist industry and associated employment; and as a key reason why the area is a nice place to live/work that may attract people to start a business here).

Officer response:

Agree – The JCS area has a rich heritage which requires protection. However, where employment uses can proceed whilst avoiding an adverse impact or would deliver the necessary funds to conserve a heritage asset then this should be considered favourably.

- Avoid the significant loss of accessible urban employment land to other uses as part of regeneration projects.

Officer response:

Agree – Retaining viable and sustainable employment land is critical but there may be some instances when in order to deliver successful regeneration on less viable or less sustainable sites, alternative uses may need to be considered to facilitate delivery.

- Balance manufacturing and service industries, and support agriculture.

Officer response:

Agree – The JCS supports all of these uses along with others. However, the JCS shall not be prescriptive in terms of these being the only acceptable uses and needs to retain sufficient flexibility to respond to growth and decline in different economic sectors.

- Support rural employment and ensure the viability of farm holdings and woodland enterprises (which underpin the conservation of landscapes and wildlife habitats). Respondents made specific calls for the JCS to:
 - Sustain the land-based sector
 - Enable farm diversification
 - Enable new small-scale business to set up in under-used and redundant farm buildings
 - Encourage home-based working
 - Support and promote rural tourism (but avoid over-reliance on this sector due to work being primarily low-paid and seasonal)
 - Support niche farm products and markets

Officer response:

Agree – Greater endorsement of existing rural employment and further rural employment opportunities should be provided within the JCS. Some flexibility as to the types of uses which are acceptable in rural areas should be allowed whilst avoiding large-scale and unsustainable rural development.

- Secure prompt deployment of high-speed broadband and provide for telecommunications (in line with PPG8).

Officer response:

Agree – The JCS fully supports this objective.

- Foster local specialisms, e.g.:
 - Gloucester – manufacturing
 - Cheltenham – services, tourism
 - Tewkesbury – light industry, logistics, tourism
 - Outer areas – tourism, home working, farming and diversification, cottage industries

Officer response:

Disagree – there is a need to be cautious about specialisms as a downturn in a single sector economy can be severe. An element of diversification is required and will be supported by the JCS.

- Support development of high-tech industry across the JCS area.

Officer response:

Partly Agree – The JCS shall support the high-tech industry but also continue to support other sectors to ensure there is sufficient diversification of the local economy.

- Include employment uses and live/work units in any urban extensions.

Officer response:

Agree – Employment uses can be complementary to housing development in order to provide for some local jobs provision. Live/work units are generally acceptable but must be in balance with the existing or proposed mix of uses to deliver sustainable communities

- Consider the provision of employment space in light of: increased development densities; reduced on-site car parking provision; open-plan workplaces; and modern working practices such as home-working and hot-desking; all of which may reduce employment land-take.

Officer response:

Agree – The JCS is informed by an ongoing Employment Land Review in which these types of issues are factored in.

- Plan for the continued development and use of local military bases in light of the changing role and requirements of the armed forces and their holdings.

Officer response:

Agree – the JCS maintains dialogue with the local military bases to stay informed of any changes in circumstances.

- Enforce green transport plans of major employment sites (GCHQ was criticised for failing to follow its own plan).

Officer response:

Whilst enforcement of travel plans may be beneficial, this is not a matter for the JCS.

- Competitively price the park and ride schemes (Cheltenham was described as being more expensive than both Bath and Oxford).

Officer response:

The pricing of Park & Ride facilities is not a matter for the JCS.

- Protect Staverton Airport as an important provider, accommodator and enabler of employment, a source of foreign exchange earnings, a profitable tax-payer benefiting all three JCS authorities, and a provider of sustainable transport options (given the high fuel efficiency of the smaller modern planes used there).

Officer response:

Noted – There are no current plans for any significant changes to the operation of the airport although the area as a whole is considered within the Broad Locations assessment work. It is recognised that there are important local employers here.

- Follow the guidance of Gloucestershire First's Integrated Economic Strategy, and the three councils' Employment Land Reviews.

Officer response:

Agree – It is important that decisions are based on sound evidence contained with the evidence base documents such as those mentioned here and also through public engagement. This will continue to be the case.

15 Urban and rural issues

Respondents wanted a balanced approach to rural and urban issues. Given that the majority of respondents (and national/regional planning policy) suggested that urban areas should be the focus of growth, specifically *urban* issues are dealt with first, and *rural* issues second. Respondents called for the JCS to:

All city and town centres:

- Secure the regeneration of Cheltenham, Gloucester and Tewkesbury centres, building on their existing strengths and facilities, with each place fulfilling complementary roles, and without compromising their distinct characters

Officer comment:

Agree – The JCS as a strategic development plan seeks to ensure that the area is attractive for inward investment to ensure that existing, new and emerging economic sectors can continue to grow and flourish across the area.

- Regenerate rather than expand town centres – several respondents called for shrinkage of centres to create and concentrate vibrancy/activity, particularly in light of the current and anticipated future impact of online retailing. A minority wished to see the centres expand.

Officer comment:

Agree – Both Gloucester and Cheltenham councils are focussing on regeneration of their central brownfield sites in order to ensure the vitality and vibrancy of the town and city centres.

- Re-use existing buildings where possible (new is not always best or most sustainable).

Officer comment:

Noted – Where existing buildings make significant contributions to their locations local planning authorities may seek to retain them. This will be achieved through policies in Local Development Documents not through policies in the JCS.

- Provide a better mix/range of quality chain stores and independent shops/markets to enhance local distinctiveness and to create an 'experience' for users (Cirencester was sited as a good example). This to be supported by attractions other than retail (e.g. festivals, culture) and good quality public spaces.

Officer Comment:

Noted – Improving the retail offer, regeneration and marketing of central areas in Gloucester, Tewkesbury & Cheltenham remains the responsibility of each authority who may pursue the matter through additional Local Development Documents.

- Promote a range of uses in town centres which result in a balanced and safe evening/night time economy – control the quantity, type and location of evening or late night uses.

Officer Comment:

Noted – Improving the evening & night time economy in the central areas of Gloucester, Tewkesbury & Cheltenham remains the responsibility of each authority who may pursue the matter through additional Local Development Documents.

- Halt out-of-centre retail development, including better control of supermarket development that draws trade from town centres. Some professional respondents accepted further out-of-town development providing the requirements of PPS4, Planning for sustainable economic development, are met.

Officer comment:

Noted – Applications for further retail development at out of centre locations will be robustly assessed in accordance in accordance with national planning policy guidance/framework taking into consideration the requirements of the sequential and impact tests.

- Make better use of vacant shop units and empty properties above shops (e.g. for affordable housing).

Officer comment:

Noted – Existing urban capacity within centres has been taken into consideration in determining locally derived housing figures.

- Provide support for more people living in town/city centres to create busy street-life around the clock, to foster a sense of community, and to improve safety after dark.

Officer Comment:

Noted – Improving the evening & night time economy in the central areas of Gloucester, Tewkesbury & Cheltenham remains the responsibility of each authority who may pursue the matter through additional Local Development Documents.

- Maintain provision of public conveniences.

Officer Comment:

Noted – Improving regeneration and public facilities of central areas in Gloucester, Tewkesbury & Cheltenham remains the responsibility of each authority who may pursue the matter through additional Local Development Documents.

- Restrict street clutter and promote high-quality public spaces, signage and street furniture.

Officer Comment:

Noted - This matter will be addressed through detailed design policies in each authority's Local Development Documents.

- Provide for transport improvements as follows:

- Improve links between Gloucester, Cheltenham and Tewkesbury
- Improve traffic management, and locate new development to minimise congestion (significant concerns were expressed over the impact of major development to the south of Cheltenham)
- Reduce the dominance of vehicles in town centres – promote pedestrian/cycle access and movement
- Support well-placed and competitively-priced park and ride schemes
- Maintain separate train stations for Cheltenham and Gloucester (do not merge in favour of an out-of-town 'parkway' station) and improve services to London (to reduce numbers driving to Swindon to catch fast services)
- Provide for a new mainline rail station at Gloucester
- Support the re-dualling of railway between Swindon and Kemble
- Support the opening of the Honeybourne Line to Stratford on Avon, with a cord to the Oxford and Paddington Line
- Improve bus services at Ashchurch Station (Tewkesbury Parkway)
- Provide for completion of the A417/419 missing link
- Provide for further development of Staverton Airport
- Improve canal and river infrastructure
- Provide free/more affordable car parking to better compete with other centres
- Consider using the A417 to bypass Cheltenham both to the east (with A435) and to the southwest.

Officer Comment:

Noted - Local Transport Plan 3 (LTP3), prepared by the County Council, is the main policy document for improvements to transport in the JCS area, however the JCS will be the delivery tool for many proposals within LTP3.

Developers called for the JCS to:

- Identify the principal areas to which regeneration policies apply and allocate key sites (thus allowing thorough testing of site deliverability against PPS3, and opening dialogue with landowners such that allocated sites are robust and deliverable in agreed timescales). There was disagreement over the use of the JCS or a Site Allocations DPD for this purpose.

Officer comment:

Noted - It is intended that the JCS will identify with a 'sharp focus' suitable, achievable & deliverable sites outside urban areas for development for the next 10 years, a 'softer focus' will be applied to sites for the last 10 years of the plan period. The SHLAA which comprises part of the evidence base for the JCS is subject to input from the development industry, moreover comment was invited from the development industry with regard to consideration of 'broad locations' when ascertaining areas of search for new strategic sites.

- Avoid imposing a phasing policy for the delivery of urban brownfield land prior to the urban extensions. Such a policy was seen as ignorant of technical and financial viability constraints, and of failing to address family housing needs given the preference for apartment development on urban regeneration sites. See also section 18, Deliverability and phasing.

Officer comment:

It is appreciated that both brown and green field sites need to be provided in order to secure a mixed supply of type and tenure of housing. The JCS will not be identifying brown field sites within urban areas as these comprise part of the existing housing supply in the JCS area, it is intended however that over the first 10 year period such urban capacity sites will be built out alongside strategic green field sites identified by the JCS.

Gloucester:

- Priority should be given to the regeneration of the Kings Quarter, Blackfriars and Greyfriars in line with Gloucester Heritage Urban Regeneration Company (GHURC) proposals.

Officer response:

Noted - Regeneration of key central sites remains a top priority for Gloucester City Council and will continue to be pursued through the emerging Gloucester City Plan and by partnership working with preferred developers.

- Set out GHURC's programme area, key projects, and programmed outputs for each site.

Officer response:

Disagree - It is not the role of the JCS to programme regeneration within Gloucester City, this will be pursued through the Gloucester City Plan Development Plan Document.

- Expand the city centre to take in the Western Waterfront areas to the west and north-west.

Officer response:

Noted – The future development of Gloucester will be pursued through the emerging Gloucester City Plan not through the JCS.

- Improve linkages between the city centre, the regeneration areas around the waterfront, and the existing retail facilities at St Oswald's Park.

Officer response:

Noted – These matters will be addressed through the emerging Gloucester City Plan not through the JCS.

- Include Eastern Avenue in proposed regeneration sites.

Officer response:

Noted – This matter will be addressed through the emerging Gloucester City Plan not through the JCS

Cheltenham:

- Focus development on the lower High Street and better link the Brewery development to the town centre.

Agreed – regeneration of this part of town to be considered through review of Cheltenham Borough Local Plan not directly through the JCS. This is being pursued through Cheltenham Development Taskforce.

- Remove the bus stops from the Promenade, to improve the pedestrian environment.
Agreed – this is being pursued through Cheltenham Development Taskforce independently by Cheltenham Borough Council not the JCS.
- Support specialist shopping areas (e.g. Montpellier and the Suffolks) through provision of nearby street parking.
Agreed – to be considered through review of Cheltenham Borough Local Plan not directly through the JCS. Character Area Appraisal and Management Plans have been produced for a number of areas within the Central Conservation Area. Areas include Montpellier and the Suffolks.
- Make better use of the Honeybourne Line as a sustainable transport route, facilitating non-motorised movement across Cheltenham from the racecourse to the train station.
Agreed – The Honeybourne Line will continue to be protected from development as they can in appropriate circumstances be used as sustainable transport corridors where walking and cycling routes can be installed. To be considered through review of Cheltenham Borough Local Plan not directly through the JCS.
- Ensure new building delivered through the Civic Pride Initiative is of the highest standards of design and sustainability.
Agreed – this is being pursued through Cheltenham Development Taskforce independently by Cheltenham Borough Council not the JCS
- Regenerate Coronation Square.
Agreed - this is being pursued through Cheltenham Development Taskforce independently by Cheltenham Borough Council not the JCS. The site is included within the Strategic Housing Land Availability Assessment.

Tewkesbury Town:

- Create a Tewkesbury Town Centre Masterplan / Development Framework (as currently proposed).
Officer response:
Agree – this is being produced by Tewkesbury Borough Council, not through the JCS.
- Improve the relationship between the town and its waterways to enhance the leisure and tourism offer.
Officer response:
Noted – This is a matter being pursued through the Tewkesbury Town Centre Masterplan.
- Enhance the local, friendly, independent feel but improve facilities to enhance and retain retail spending and to improve visitor numbers/duration of stay.
Officer response:
Noted – This is a matter being pursued through the Tewkesbury Town Centre Masterplan.
- Improve and diversify employment opportunities.
Officer response:
Noted – This is a matter being pursued through the Tewkesbury Town Centre Masterplan and the Economic Development Strategy
- Consider a bypass to reduce air pollution/traffic problems.
Officer response:
Noted – Any such scheme would need to be carefully considered in terms of other impacts and funding availability.
- Address the role and scale of commercial development at M5 junction 9.
Officer response:
Noted – This will be considered in the next stages of the Core Strategy.
- Acknowledge the high degree of interaction between communities in Tewkesbury/Northway and those in Worcestershire for work and leisure. This applies particularly to public transport issues, including rail fares and the absence of cross-border bus services.
Officer response:
Noted – this will be considered as part of work allied to the Joint Core Strategy in preparing an Infrastructure Delivery Plan

Rural areas / the wider Tewkesbury Borough:

Issues affecting rural areas and smaller towns/villages are covered throughout this report, but key issues relating to service provision and rural/urban relationships are highlighted here.

Respondents called for the JCS to:

- Avoid focusing on towns/cities at the expense of rural communities.

Officer comment:

Agree – There will be a need for rural areas across the JCS to accommodate some growth as part of the emerging JCS strategy.

- Protect the AONB, Green Belt and productive agricultural land – as detailed in section 13, Sustainability.

Officer comment:

Agree - The JCS seeks to protect the AONB and further landscape designations wherever possible. A Green Belt Review has been produced as part of the JCS evidence base to consider the function of the whole of the green belt between Cheltenham and Gloucester, Cheltenham and Bishop's Cleeve.

- Provide affordable housing – as detailed in section 14, Housing.

Officer comment:

Agree – A mixture of market housing and affordable housing will be provided across the JCS area. A Strategic Housing Market Assessment has been produced by Gloucestershire County Council working with the six authorities which comprise Gloucestershire. The report forms part of the JCS evidence base and can be used to assess housing need and demand in order to develop policies.

- Support the rural economy – as detailed in section 15, Employment.

Officer comment:

Agree – It is recognised that due to the rural nature in parts of the JCS area that specific attention needs to be given to the rural economy. The JCS as a strategic development plan seeks to ensure that the area is attractive for inward investment to ensure that existing, new and emerging economic sectors can continue to grow and flourish across the area. An Employment Land Review has been produced as part of the JCS evidence base to address the need for and type of employment land across the area.

- Provide new housing only in proportion to the existing settlement, and with reference to social infrastructure provision and the transport network – as detailed in section 14, Housing.

Officer comment:

Noted – The unique character of the JCS area has been taken into consideration when identifying strategic new development areas. Local household projections have been produced in order to determine the amount and type of housing to come forward over the plan period. It is proposed that a Community Infrastructure Levy/Infrastructure Development Plan will be prepared alongside the JCS Preferred Option.

- Ensure adequate provision of social infrastructure and convenience facilities in rural areas to reduce the need to travel – both for the existing population (in the absence of growth) and in response to any proposed development – as detailed in section 14, Housing and section 17, Sustainable urban extensions.

Officer comment:

Agree - The unique character of the JCS area has been taken into consideration when identifying strategic new development areas. The JCS will work towards producing sustainable development and creating new sustainable communities. It is proposed that a Community Infrastructure Levy/Infrastructure Development Plan will be prepared alongside the JCS Preferred Option.

- Provide better access by public transport to urban centres from rural areas.

Officer comment:

Agree - The JCS will work towards producing sustainable development and creating new sustainable communities.

- Ensure the concentration of new development around urban areas does not suck in capital expenditure on infrastructure to the detriment of investment required to existing infrastructure in the rural hinterland.

Officer comment:

Agree - The JCS will work towards producing sustainable development and creating new sustainable communities. A Sustainability Appraisal of the JCS will be undertaken in order to ensure that urban sprawl is limited and ensure the containment of settlements.

It is important to note that, while many respondents called for the JCS to provide for 'appropriate development' in rural settlements, many respondents also sought to remove specific settlements from consideration for further development – usually on the grounds of: existing over-development; inadequate social infrastructure; flood risk; conservation; poor transport connections; and/or sustainability issues.

16 Sustainable urban extensions

As indicated in section 14, above, respondents were well-informed on housing issues arising from the emerging RSS and in particular on the sustainable urban extensions (SUEs) to Gloucester and Cheltenham proposed in the RSS.

Respondents expressed significant concern over the evidence for and scale of RSS housing targets, and the need for urban extensions. Doubt was cast on the housing growth targets in light of the economic downturn, and support was expressed for environmental conservation in its own right, as well as in response to climate change, flood risk, biodiversity, pollution, food security, character and heritage for example. Several respondents highlighted the lack of adequate Sustainability Assessment on three of the five Areas of Search for SUEs and the resulting likelihood of legal challenge such that these areas should not be considered for development until the issue is resolved.

Respondents called for the JCS to:

- Protect the AONB, the Green Belt, and productive agricultural land.

Officer response:

Noted – Sustainability appraisal, which takes into consideration all landscape and environmental constraints and designations has been undertaken on all the broad locations considered by the JCS in order that members can come to informed choices with regard to the preferred strategic sites for new development over the first 10 year plan period.

- Prevent urban sprawl and the coalescence of settlements.

Officer response:

Agree – The challenge for the JCS is to accommodate new growth around the existing urban centres across the three authorities without causing either urban sprawl or coalescence of settlements. A Green Belt Review has been undertaken in order to provide part of the evidence base for the JCS. A further Green Belt Review will be undertaken.

- Protect the unique character of the area and its settlements.

Officer response:

Agree – Part of the attractiveness of the JCS area is its unique landscape setting from Cotswold escarpment in the east to Severn Plain in the west. It is the role of the JCS to identify areas that can accommodate growth without having an adverse impact on the unique character of the area or its settlements.

- Avoid overwhelming existing transport and social infrastructure with further population growth.

Officer response:

Noted – It will be necessary for any new growth areas to benefit from the relevant physical and social infrastructure. It is intended that an Infrastructure Delivery Plan will sit alongside the adopted JCS.

- Re-use brownfield sites and empty buildings (which benefit from existing infrastructure, services, facilities and access) before greenfield sites.

Officer response:

Noted – In order to provide a mixed supply of size and tenure of dwelling units it will be necessary to allow green field releases alongside the continued regeneration of brown field sites in the urban areas.

- There were some calls for construction of one new town (or major SUE) in preference to multiple SUEs (only if the housing need is proven), and for development of Staverton Airport for housing (the green belt here being viewed as already 'degraded' and connections being good, thus making its development preferable to that of 'untouched' green belt elsewhere).

Officer response:

Disagree: It is necessary to plan for the indigenous growth of Gloucester, Tewkesbury and Cheltenham by providing sustainable extensions to each centre as well as providing for growth in the rural areas. One large new settlement would not be sustainable as it would result in increased commuting to existing areas of local employment. The area to the north of Gloucester City is being considered for public consultation as a Broad Location option.

Respondents were asked to consider what should happen if SUE(s) are proven to be necessary. They called for the JCS to:

- Ensure any SUE provides adequate social, physical and transport infrastructure to support itself, as well as addressing existing local deficiencies (see also section 18, Deliverability and phasing, below).

Officer response - Please see responses to Deliverability and Phasing

- Ensure the necessary infrastructure is in place prior to construction/occupation of housing (see also section 18, Deliverability and phasing, below).

Officer response - Please see responses to Deliverability and Phasing

- Ensure new development is mixed tenure and with a real sense of community, high design/space standards and adequate open space for both people and wildlife.

Officer response:

Noted – In order to be sustainable new strategic developments need to provide a mix of type and tenure of dwellings and need to integrate well with existing communities whilst providing opportunity for community development within the new area. It will be the responsibility of each authority to implement best practice design and space standards within strategic developments in accordance with adopted local development plan policies.

- Ensure SUEs are designed to reduce waste, and equipped to process their own waste.

Officer response:

Noted – The strategic management of waste in the JCS area is led by the County Council via the Minerals and Waste Core Strategy. Developers will need to accord with this Development Plan Document with details of waste management regimes being considered at the master planning stage of each strategic development.

- Provide a full-access Junction 10 if major development goes ahead in northwest Cheltenham.

Officer response - Please see responses to Deliverability and Phasing

The development industry considered that the proposed SUEs have a vital role to play within the JCS area in providing new homes (open market and affordable), social infrastructure and employment opportunities for the well-being of existing and future populations. These respondents drew attention to the requirements of the emerging RSS and the provisions of PPS12 whereby the JCS must conform generally to the RSS.

17 Deliverability and phasing

Developers accepted the need to contribute towards social infrastructure, providing the requirement does not impact so significantly on viability that it precludes the development from coming forward in the first place. Respondents expressed mixed views on the Community Infrastructure Levy (CIL), as follows:

- Impose a standard CIL to provide clarity for developers and local authorities.
- Impose a CIL on development above agreed size thresholds, and incorporate site-by-site flexibility having regard to development viability (e.g. lower tariffs for urban regeneration sites).

- Avoid the Community Infrastructure Levy, instead seeking developer contributions to infrastructure provision on a site-by-site basis, subject to viability and in accordance with national policy.

Officer response:

Whilst comments one and three appear to be contradictory, it should be noted that from April 2014 a local authority will not be able to pool contributions from more than five developments towards provision of infrastructure not being funded by CIL. Therefore securing contributions towards funding provision of, for example, strategic road improvements to cater for increased cumulative traffic generated from development of several sites would not be possible without CIL. However, s.106 may still have an important role to play in relation to the mitigation of certain site-specific impacts and it will remain central in respect of affordable housing (which is exempt from CIL). CIL and s.106 should not, therefore, be viewed as “either/or” in a general sense.

Size thresholds are statutorily incorporated within CIL. The charge cannot apply to development smaller than 100m² gross internal floor area. There are also other forms of statutory “relief” such as apply to charities and social housing.

Whilst within an overall context of economic viability CIL needs to be reasonably flexible and responsive to change, flexibility on a site-by-site basis may defeat a fundamental objective of CIL – to provide greater certainty to the public and developers as to the level of contributions a development will be required to make towards the provision of infrastructure in the area.

Local residents and pressure groups expressed a hard line, calling for the JCS to:

- Impose a levy to direct development to brownfield sites and away from greenfield sites (i.e. impose substantially higher levies on greenfield than brownfield sites).

Officer response:

The phasing of development having regard to the primacy of brownfield or greenfield sites is properly a matter for the strategic policies of the plan. It is not for CIL to introduce different contribution rates by reason solely of such classification since the infrastructure demands of development of a site – whether it is brownfield or greenfield - will not necessarily bear any relation to its status in this respect. Variations in levy charges in different areas or relating to different types of development should be governed primarily by considerations of economic viability.

- Permit reduced charges only in relation to green/biodiversity and community projects.

Officer response:

Noted, but it is essential that the CIL is based upon sound evidence and reasoning. There currently is no obvious objective justification or JCS policy support for differentiation along these lines.

- Secure climate change amelioration measures and renewable energy initiatives as part of planning conditions.

Officer response:

Noted - this is a planning policy issue rather than a matter directly for CIL.

- Ensure all development and infrastructure costs are met by developers, with no cost burden being placed on the three local authorities and ultimately the residents of those areas.

Officer response:

Developers will be expected to make contributions towards the provision of infrastructure both on and off-site as required, and towards mitigation of other impacts of development. But additional sources of funding are likely to be needed to ensure that adequate infrastructure comes forward. This funding will come from a variety of sources including government. It might also be borne in mind that local authorities will receive council tax revenue from new development.

- Ensure new social infrastructure is in place prior to the occupation of new development.

Officer response:

Noted - although the same rationale could apply to physical and green infrastructure.

Phasing was a controversial area. Many respondents expressed a preference for “brownfield first”, and there were calls for the JCS to identify key areas of Gloucester City and Cheltenham as

regeneration areas and to include a suite of policies specific to them to bring forward development schemes.

Meanwhile the development industry called for a flexible approach, and predicted negative impacts of phasing for housing choice and deliverability, as follows:

One respondent quoted the Panel Report for the RSS, which is of relevance to both sides of the debate. It addressed the public's preference for greenfield sites to be reserved "until brownfield sites are exhausted" in the following terms:

18 Flooding

In light of the extreme flood event experienced locally in summer 2007, respondents viewed flood prevention and mitigation as the most important planning issue in the JCS area, and there was a high level of awareness of the challenges involved. While there was consensus on the importance of this issue, there was disagreement over the adequacy of current policies to address it.

Many respondents questioned the effectiveness of existing national policy and called for a "belt and braces approach" in which the JCS would impose flood policies *beyond* those of central government. However, the development industry viewed the current policy and technical assessment framework as adequate, highlighting PPS25's demand that flood risk is considered at all stages of planning, taking into account climate change and sustainable drainage strategies.

Bearing in mind this disagreement, respondents called on the JCS to:

- Support and introduce the Pitt Report recommendations and make reference to the Water Framework Directive (on water quality).

Officer response:

Noted: The Pitt Report contains 92 detailed recommendations. The JCS authorities are working with the County EA and other parties to ensure they are implemented. Where appropriate to a spatial document they will be incorporated, as will requirements of the Water Framework Directive.

- Re-define the flood zones to incorporate local knowledge – and a margin to account for climate change.

Officer response:

Noted – Strategic Flood Risk Assessment Level 2 (SFRA 2) is a detailed piece of work that not only takes account of modelling but empirical evidence i.e. local knowledge of previous floods. All floods will be different however, and small scale/surface water flooding is particularly difficult to predict and will change over time. Further work may be needed on extending SFRA coverage depending on broad locations work. Also as new modelling techniques come on stream then flood maps will need to be updated. Any policy will contain a margin for Climate Change.

- Account for both fluvial and pluvial flooding in flood risk assessment and flood defences (noting that, according to the Pitt Report, one third of the 57,000 homes flooded in 2007 were flooded by surface water, and therefore not necessarily in the floodplain). The Surface Water Management Plan (SWMP) for Gloucester City should therefore be extended to cover the rest of the JCS area for inclusion (alongside Hazard Mapping) in Level 2 Strategic Flood Risk Assessment (SFRA).

Officer response:

Noted - Surface water is notoriously difficult to predict. We must ensure that we are proportionate in terms of the work undertaken. However, Surface Water Management Plans (SWMPs) are now being prepared for Cheltenham, the Tewkesbury, Northway and Ashchurch area, the Bishops Cleeve, Woodmancote and Southam area in addition to the Gloucester SWMP

- Ensure there is no building on the floodplain, and consider a 10-metre easement along flood zones. Some respondents went further, proposing a "managed retreat from the floodplain", i.e. removing existing structures in, or alterations to, the functional flood plain.

Officer response:

Accepted in part – Flood plains are zoned to take account of probability. Certain uses can be built in high probability flood zones. Vulnerable uses however, should not be allowed in high probability flood zones. Managed retreat has been supported by JCS authorities in the past especially on those sites identified in the Shoreline Management Plan for the Severn Estuary. Significant structures have already been removed from the functional floodplain as part of development

proposals in Gloucester and work will continue in this vein. A 10 metre easement while workable on gently shelving flood plains becomes meaningless when topography is more severe. A more sophisticated method of reducing risk could be looked into however,

- Ensure new development does not increase (and should be designed to reduce) flood risk to existing properties.

Officer response:

Noted - Development should not increase flood risk to other properties. There will be occasions where betterment can be negotiated; however, any policy pursuing this will need to be appropriate.

- Ensure water and sewerage infrastructure is in place ahead of any development. Developers must demonstrate adequate on- and off-site water and sewerage capacity to serve their site without affecting existing residents. Where capacity problems are identified, planning permission should only be granted if the developer funds the appropriate improvements for completion prior to occupation of the development. See also section 18, Deliverability and phasing.

Officer response:

Accepted

- Permit the development/expansion of water and sewerage infrastructure where it is needed to serve existing or proposed development, or in the interests of long term water supply and waste water management (provided that the need outweighs any adverse land use or environmental impact, and that any such adverse impact is minimised).

Officer response:

Accepted

- Restrict ground-raising unless it forms part of an approved flood alleviation scheme, or as part of a new development which requires ground-raising to achieve flood resistance measures. In this instance a Flood Risk Assessment must prove that there will be no increase in flood risk elsewhere, and demonstrate how this will be achieved.

Officer response:

Accepted (in areas identified as being prone to flood)

- Demand practical flood prevention measures in new development including:
 - Sustainable Urban Drainage Systems (SUDS). It is important to note that there was considerable disagreement over the effectiveness of SUDS. Supporters claimed they are essential and effective in controlling water flow and improving water quality, providing the correct mix of techniques are employed according to local conditions. Opponents claimed local soil types render SUDS ineffective, and suggested SUDS should only be used if proven successful via on-site testing.
 - Planting, woodland creation and woodland management schemes to control water flow (while simultaneously creating attractive environments, amenity benefits, and aiding biodiversity).
 - Grey water recycling.
 - Mandatory flood resistance and resilience measures in all ground floor extensions and new buildings located in residual risk areas.
 - Restricted permission for conversion of cellars to habitable basements in line with flood risk.
 - Permeable hard surfaces.
 - Upgrading dated, low-capacity or combined sewers.

Officer response:

Accepted in part – SUDS are an effective way of restricting surface water discharge in a manner that does not rely on traditional piped underground systems that can fail and may not deliver capacity requirements. There are also biodiversity and amenity benefits. Different solutions are required for differing lithologies and soil types. The JCS will actively pursue SUDS.

Woodland creation will be supported for a number of reasons including water resource management – Unfortunately with current knowledge we can not rely on it to deliver a measured reduction in flood flow.

Grey water recycling will be supported for wider sustainability reasons in particular water resource management.

Flood resilience measures will be pursued in areas of flood risk

As pointed out by other respondents surface water is the reason for many flood incidences and this will only be exacerbated by an increase in hard surfacing. We will as a matter of course

pursue development that utilizes permeable surfacing as well as green roofs and other means to ensure water is treated in a sustainable manner
We will seek advice from Severn Trent and where appropriate negotiate on their behalf on issues of combined and under capacity sewers.

- Incorporate River Severn Catchment Flood Management Plan policies.

Officer response:

Accepted where relevant to a spatial planning document. Note: Much of Gloucester is covered by the Severn Tidal Tributaries CFMP

- Consider producing a Water Management Supplementary Planning Document (SPD). Several respondents called for Tewkesbury Borough Council to adopt the draft Flood and Water Management SPD prepared by the Severn and Avon Flood Group. This is noted here while drawing attention to the legal requirement of PPS12 that communities must work with the Local Planning Authority (LPA) and should not expect to prepare plans independently and have them adopted as SPD.

Officer response:

Accepted in part – some SPD that covers water management may well be appropriate

- Consider producing a full Water Cycle Study as part of the evidence base.

Officer response:

Accepted in part – A full blown water cycle study would be cost prohibitive. However, there is a great deal of material currently available which is being brought together for the purpose of the JCS including the SFRA Level 1 and 2 along with the aforementioned SWMPs.

- Consider including dedicated policies covering water quality and land contamination.

Officer response:

Noted

Many respondents expressed concern over the possible development of specific sites, detailing their experiences of flooding on the sites and highlighting the anticipated impact of development on neighbouring properties. Areas flagged for concern include all the RSS Areas of Search for urban extensions and more besides: Leckhampton, Shurdington, Warden Hill, northwest Cheltenham, north of Brockworth, north of Gloucester / the A38 corridor, south of Gloucester, Minsterworth and Elmstone Hardwicke.

Officer response:

Noted - All previous RSS sites have been subject to a Strategic Flood Risk Assessment Level 2. This is a detailed piece of work that uses the most up to date modelling available and empirical evidence. No site should come forward that is at risk of flood unless it can be demonstrated that it passes the sequential test (and exception test if appropriate). It must also be demonstrated through a detailed site specific Flood Risk Assessment that it does not increase the risk of flood elsewhere and that flood resistance and resilience measures can sufficiently mitigate the risk.

Many respondents also expressed concern over maintenance of flood defences, dredging etc, highlighting the importance of: regular maintenance by riparian land-owners and/or the Local Authority; setting clear roles and responsibilities for those involved; and robust enforcement. This is an operational issue, outside of the JCS remit, but is noted here for completeness.

Officer response:

Noted - but not an issue for a spatial plan other than to avoid problems of silting and blocked culverts in new development. As such a SUDS policy will be pursued

19 Green infrastructure

Protection of green spaces was a high priority for the majority of respondents. The Green Infrastructure approach to the management of open spaces was endorsed by many: connecting and managing all green spaces for free access and multi-functional use by all. Respondents called for the JCS to:

- Protect and promote the positive management of: the AONB (with reference to the Cotswolds AONB Management Plan), Green Belt, woodlands, productive agricultural land, playing fields, allotments, disused railways, parks and open spaces.

Officer response:

Agree – The JCS seeks to protect the AONB and an existing POS across the three authorities. A green belt study has been produced as part of the JCS evidence base to consider the function of the whole of the green belt between Cheltenham and Gloucester.

- Promote and secure improved access to all of these spaces (acknowledging the pressures imposed by public access, and accepting that some areas may need protection/limited access, for example dog-walking restrictions in areas with ground nesting birds).

Officer response:

Agree –With caution the green infrastructure strategy will attempt to connect people with green space. Improved access will be a component but it has to be recognized that the vast majority of land is in private ownership and managed for a purpose with often limited access.....

- “Green” the existing urban fabric where possible.

Officer response:

Agree - GI strategy will aim to preserve and enhance green spaces within urban areas

- Support the establishment of a new regional park.

Officer response:

Support welcomed

- Provide new and complementary, linked habitats and green spaces in the Severn Vale.

Officer response:

Agree - Part of the raison d’etre of the Regional Park will be to support the creation of linked complimentary habitats and green spaces in the central vale

- Provide a mix of formal and informal open spaces.

Officer response:

Agree – a mix will be encouraged

- Support the provision and expansion of allotments, community orchards and community composting (linked to local food schemes, see also section 13, Sustainability).

Officer response:

Agree with caution – Allotments, Community orchards and related land uses will be supported. While composting schemes and linkages to local food networks is to be supported it may not be best pursued through the JCS

- Promote biodiversity and habitats (through a dedicated set of policies, not as an add-on).

Officer response:

Agree- The protection and promotion of habitats and linkages between them will be a component of any policy stance on biodiversity

- Set a high standard for open space design and landscape treatment and provision of wildlife habitats in new developments. Ensure that ‘green spaces’ provided by developers are adequate and usable (not token gestures on undevelopable land) and contribute to a green network.

Officer response:

Agree with caution - high standards will be set and the norm will be to ensure green spaces are adequate and useable and preferably bio diverse. However, there will be exceptions and the Government is experimenting with biodiversity off-setting, while no decision has been made on this, it may be something the JCS authorities in the JCS may wish to pursue.

- Address the business opportunities associated with Green Infrastructure and links with an emerging greener economy.

Officer response:

Agree – Investment gravitates to quality environments and it will be incumbent on the JCS generally to ensure that the quality environment currently experienced is preserved and enhanced. With regard to strategic green infrastructure the economic benefits from ‘wildlife tourism’ and related activity are well know and will be promoted.

- Retain access to the countryside for existing communities on the urban-fringe.

Officer response:

- Maintain footpaths/rights of way and provide better cycle tracks (separate from the highway) to link villages/green spaces.

Officer response:

Agree – GI strategy will support informal and formal rights of way as a means of accessing the wider countryside. We will work with developers and organizations such as Sustrans to ensure cyclists are better catered for

- Support farmers as “the guardians of the countryside”.
Agree with caution – While we would support farmers as guardians of the countryside, in the past 50 years agricultural intensification has resulted in loss of landscapes and biodiversity. Farmers need the right framework to allow them to farm the land profitably but in a manner that does not degrade environmental capital. The JCS will support farmers where it can achieve this objective
- Support the provision of green burial sites.

Officer response:

Agree in principle. - This is something not previously considered but given the general positive benefits then it is something to be encouraged.

20 Site-specific recommendations

PLEASE NOTE: The following site-specific recommendations are presented for information, in no particular order, summarised from information supplied by respondents, and without prejudice to policies in the JCS or to any future planning applications:

Cheltenham urban area

- Lower High Street – in need of regeneration
Cheltenham Development Taskforce is looking at ways of improving linkages in a number of areas in the town centre. One of the ideas is linking the High Street to the Brewery making it easier to walk between the two. This will be a starting point for raising the long term economic performance of this area. The Supplementary Planning Document “Lower High Street Character Area Appraisal and Management Plan” was produced for the area.
- Car parks north of the town centre – suitable for high density housing, multi-storey parking, and office use, no retail
North Place and Portland Street car parks are allocated sites for mixed use development in the Cheltenham Borough Local Plan. This forms part of a comprehensive redevelopment under the Cheltenham Development Taskforce project. Existing Civic Pride Urban Design Framework (December 2010) SPD and North Place and Portland Street Development Brief cover the site. The site is included within the Strategic Housing Land Availability Assessment.
- Land at the Hayloft, Cheltenham – suitable for housing development if exceptional circumstances for Green Belt development can be proven
The site is included within the Strategic Housing Land Availability Assessment.
- Land at Badgeworth Road, Cheltenham – suitable for mixed-use development if exceptional circumstances for Green Belt development can be proven
The site is included within the Strategic Housing Land Availability Assessment.
- Land at Swindon Lane, Cheltenham – part of Hunting Butts Farm application. Suitable for housing development if exceptional circumstances for Green Belt development can be proven.
The site is included within the Strategic Housing Land Availability Assessment.
- Hunting Butts Farm, Cheltenham – suitable for housing development
The site is included within the Strategic Housing Land Availability Assessment.
- Blakeway/Berry land, Cheltenham – suitable for housing development
Noted
- Briarfields – suitable for housing/mixed-use development
The site is included within the Strategic Housing Land Availability Assessment.
- Cheltenham bus station – suitable for regeneration as mixed-use / entertainment area

The site forms part of a comprehensive redevelopment under the Cheltenham Development Taskforce project. A Development Brief was produced for the site. The site is included within the Strategic Housing Land Availability Assessment.

- Land at Badgeworth Road, Cheltenham – suitable for employment uses
The site is included within the Strategic Housing Land Availability Assessment.
- Land at Prestbury – suitable for housing development
The site is included within the Strategic Housing Land Availability Assessment.
- Northwest Cheltenham – suitable for mixed-use, residential and employment development
The site is included within the Strategic Housing Land Availability Assessment.
- Land at Hyde Farm, Cheltenham – suitable for housing development
The site is included within the Strategic Housing Land Availability Assessment.

Gloucester urban area

- All GHURC sites – suitable for mixed-use development
Officer response:
Noted - Regeneration of key central sites remains a top priority for Gloucester City Council and will continue to be pursued through the emerging Gloucester City Plan and by partnership working with preferred developers.
- Kings Quarter – suitable for mixed-use development
Officer response:
Noted - Regeneration of key central sites remains a top priority for Gloucester City Council and will continue to be pursued through the emerging Gloucester City Plan and by partnership working with preferred developers.
- Land at Naas Lane – suitable for employment development
Officer response:
Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.
- The Knoll, Stroud Road – suitable for housing development
Officer response:
Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan
- Helipebs (Holdings) Ltd land at Sisson Road – suitable for housing development
Officer response:
Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.
- Corncroft Lane, Matson – suitable for housing development
Officer response:
Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.
- Sylvanus Lyson's Charity land at Hempsted – suitable for housing development
Officer response:
Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.
- Hempsted Lane – suitable for housing development
Officer response:
Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.
- Gloucester Railway Triangle – suitable for a new prison
Officer response:
Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan. The northern railway triangle is currently the subject of a mixed use planning application. At the time of writing this response the application has

not been determined. The site lies within a larger area the subject of an adopted Development Brief.

- Gloucester Railway Triangle and Great Western Road Yard – suitable for housing development

Officer response:

Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan. These sites lie within a larger area the subject of an adopted Development Brief.

- Site SUB17 – suitable for housing development

Officer response:

Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.

- Winneycroft Farm – suitable for housing development

Officer response:

Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.

- Elmbridge and Pirton Court – suitable for housing, mixed-use, park and ride, transport hub

Officer response:

Noted – This site lies within Tewkesbury Borough and was identified in Local Transport Plan 3 as a possible location for a transport interchange including a Park and Ride and 'Parkway' train station for both Gloucester and Cheltenham

- Eastern Avenue/Barnwood – suitable for employment development

Officer response:

Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.

- Bristol Road/Olympus Park/Waterwells – suitable for employment development

Officer response:

Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.

- Gloucester Business Park – suitable for employment development

Officer response:

Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.

Tewkesbury urban area

- Northway – suitable for retail park, e.g. Ikea

Noted - Land at Northway may be suitable for some small scale retail development to serve residents of the area, however in line with national policy large scale retail development is more appropriately situated within or adjacent to town centres to aid access by a choice of means of transport. The location of any large scale retail park will be considered as part of the Joint Core Strategy.

- Ashchurch MOD base (if closed) – suitable for employment development

Officer response:

Locations for strategic development are being considered through the Joint Core Strategy process. This will be considered in the next stages of the Core Strategy. Any redevelopment of large brownfield sites will be assessed in terms of its ability to contribute to sustainable communities

- Mythe land – suitable for housing development

Officer response:

Locations for strategic development are being considered through the Joint Core Strategy process. This will be considered in the next stages of the Core Strategy.

- Mitton land – suitable for housing development

Officer response:

Locations for strategic development are being considered through the Joint Core Strategy process. This will be considered in the next stages of the Core Strategy.

- Wingmoor Farm – to be returned to community use as public open space

Noted - The remediation and landscaping of land at Wingmoor Farm after it's close as a landfill site will be dealt with by the County Council as the waste planning authority. However, the long term use of Wingmoor Farm as a landfill site is being pursued by the Gloucestershire Waste Local Plan currently being developed by County Council.

- Tewkesbury/Northway – suitable for mixed-use development, subject to the caveat that any development should not extend to the east beyond the B4079 at Aston Cross or impact on the settlement of Pamington

Noted – Development at this location together with potential impacts on the landscape will be considered as part of the Joint Core Strategy.

- Land at Tewkesbury Park Fields (Lincoln Green Lane) – suitable for housing development

Officer response:

Locations for strategic development are being considered through the Joint Core Strategy process. This will be considered in the next stages of the Core Strategy. Land at Lincoln Green Lane falls within the registered battlefield boundary.

- Land at Tying House – suitable for housing development

Officer response:

This site does not present a location for strategic development. Smaller sites will be considered through the rural settlement strategy in later stages of Tewkesbury's development plan.

- Land at Banady Lane – suitable for housing development

Officer response:

This site does not present a location for strategic development. Smaller sites will be considered through the rural settlement strategy in later stages of Tewkesbury's development plan.

- Land at Banady Lane – suggested for designation as Important Open Space

Officer response:

The inclusion of land as important open space will be in later stages of Tewkesbury's development plan

- Land at Two Hedges Road – suitable for housing development

Officer response:

This site does not present a location for strategic development. Smaller sites will be considered through the rural settlement strategy in later stages of Tewkesbury's development plan. This land also falls within the Green Belt and development of this site would need to be assessed against emerging policy.

- Land at Stoke Orchard (Coal Research Establishment) – suitable for mixed-use development

Officer response:

This site is the subject of a current planning application for mixed use development.

- Land south of Bredon Road – suitable for housing development

Officer response:

This site does not present a location for strategic development. Smaller sites will be considered through the rural settlement strategy in later stages of Tewkesbury's development plan.

21 Recommended reading

Respondents highlighted the following documents/initiatives for the attention of the JCS team:

- Building for Life
- CABE/RIBA space standards
- CPRE, Affordable Rural Housing Commission report: A sustainable future for rural affordable housing?
- Study into the Environmental Impacts of Increasing the Supply of Housing in the UK, April 2004
- UK Low Carbon Transition Plan:
www.decc.gov.uk/en/content/cms/publications/lc_trans_plan/lc_trans_plan.aspx
- England's Trees, Woods and Forests - Delivery Plan 2008-2012: www.forestry.gov.uk/etwf
- Woodfuel Strategy for England: www.forestry.gov.uk/england-woodfuel
- Meeting the Housing Requirements of an Aspiring and Growing Nation
- Cotswolds AONB Management Plan
- Local Quality of Life Indicators - Supporting Local Communities to Become Sustainable, Public Sector National Report, AC August 2005
- Safer Places - The Planning System and Crime Prevention (ODPM/Home Office, 2004)
- www.securedbydesign.com
- www.saferparking.com
- UK Low Carbon Transition Plan
- 2008 Survey of Renewable Electricity and Heat Projects in South West England
- The Taylor Review, 2008
- Better Places to Play Through Planning, Play England
- Exemplar sustainability policies: Uttlesford District Council's policy for off-setting carbon emissions of extensions, Milton Keynes' 'Tariff', and Merton's 'Rule'
- Research by Cycling England: www.dft.gov.uk/cyclingengland/site/wp-content/uploads/2009/03/planning-for-cycling-report-10-3-09.pdf
- Department for Transport on the costs/benefits of cycling: <http://live-webtag.dft.gov.uk/documents/expert/unit3.14.php#057>
- Friends of the Earth's *Get Serious about CO2* campaign: www.foe.co.uk/campaigns/climate/get_serious/index.html

D. Part 1 Online Consultation

22 Purpose of the online consultation.

The latter part of this report summarises the results of the *Part 1* consultation, in line with the five parts of the questionnaire: Spatial Portrait, Key Issues, Vision, Strategic Objectives, and general comments. This is followed by areas of common ground and disagreement.

23 Summary of responses received

Spatial Portrait

Seven responses received (17%) were in full support of the Spatial Portrait. Only one respondent disagreed with the Spatial Portrait and the majority of respondents sought clarification on specific issues or suggested alternative wording.

The following were highlighted for further consideration in future drafts of the Spatial Portrait:

- Achieve a better balance between urban and rural issues, and between the positive and negative characteristics of the sub-region.

Officer response:

Agree – A rural strategy will be prepared which will focus on the need of the rural communities to ensure that development will be provided within both urban and rural locations.

- Include the canal corridor, River Avon and the Green Belt as key features of the JCS area.

Officer response:

Noted.

- Provide more detail on regeneration initiatives and their objectives – e.g. the Tewkesbury Town Centre Masterplan, GHURC and Civic Pride.

Officer response:

Noted – The JCS recognise the importance of the regeneration initiatives, although repetition of existing documents should be prevented. Cross referencing could be used to prevent repetition.

- Give consideration to the hierarchy of settlements e.g. Bishops Cleeve and Winchcombe were described by respondents as main settlements in the JCS area and were compared to Brockworth and Churchdown in terms of scale/services, while clarity was requested over the term Tewkesbury/Northway.

Officer response:

Noted – The hierarchy of settlements will be re-considered. Further justification should be provided should a settlement not be included as a main settlement.

- Consider the strategic role and future of Gloucestershire Airport.

Officer response:

Noted.

- Concern was expressed that statements on population, employment, employment land, households, skills, crime etc, must be backed up by evidence.

Officer response:

Agree – The JCS have an evolving evidence base which will support and influence the core strategy and development management policies.

Key Issues

Four of the forty respondents fully agreed with the Key Issues and only two respondents disagreed. A majority of respondents (85%) sought clarification on specific issues or suggested alternative wording.

Comments applying to all Key Issues are summarised, followed by comments that were specific to particular Key Issues:

- Achieve a better balance between urban and rural issues, and between the positive and negative characteristics of the sub-region.

Officer response:

Agree – A rural strategy will be prepared which will focus on the need of the rural communities to ensure that development will be provided within both urban and rural locations.

- Consider the prioritisation of issues and objectives.

Officer response:

Noted.

- Include community safety (crime and fear of crime) and the need for cross-boundary working as key issues.

Officer response:

Noted.

- Consider the evidence provided in the South West Regional Spatial Strategy and West Midlands Regional Spatial Strategy.

Officer response:

Agree – The evidence base behind the RSS's can be beneficial to the JCS even if the proposed outcomes were not supported locally.

Key Issue A – Risk of lack of self-reliance and complementarity between settlements

- Editorial comments only.

Key Issue B – Regeneration of urban areas

- State the importance of this historic environment and identify opportunities for regeneration outside of urban centres in 'other parts of built-up areas'.

Officer response:

Agree – The JCS recognise that there are opportunities for regeneration outside of urban centres. The rural strategy will help identify these issues.

Key Issue C – Regeneration of urban areas

- Emphasise the distinctiveness of the local economy.

Officer response:

Agree – The JCS recognise the importance of the local economy and believes there are opportunities to emphasise this within the core strategy.

Key Issue D – Increasing demand for housing and particularly affordable housing

- Consider the difference between housing 'need' and 'demand' (in accordance with strategic objective 3, housing)

Officer response:

Agree – The JCS development management policies will clarify these issues in accordance with the requirements of PPS3.

- Refer to the County Council's housing/population projections.

Officer response:

Agree – Gloucestershire County Council have prepared population and household projections which will establish future need. These results will contribute to the data required within the econometric model which will test affordable housing criteria across the JCS area.

- Refer to accommodation for students, families and the elderly.

Officer response:

Agree – The JCS recognise the importance for all members of society to have access to a decent home.

- A conflict was highlighted between respondents who want 'brownfield sites to be redeveloped before Greenfield sites', and respondents who believe that adequate brownfield capacity does not exist so peripheral 'major growth locations' must be considered with a view to securing associated infrastructure improvement.

Officer response:

Noted – In order for the JCS to create a 'sound' plan, additional sites on the periphery of existing built up areas will be required to meet the requirements of the future populations.

Key Issue E – Low skills and poor education attainment

- Refer to apprenticeships, higher education and the high calibre of schools in the JCS area.

Officer response:

Noted.

- Use 'Disparity in skills and educational attainment' as an alternative description.

Officer response:

Noted.

Key Issue F – Job provision, lack of employment and economy

- Refer to apprenticeships and the distinctiveness of the local economy.

Officer response:

Noted.

Key Issue G – Deprivation

- No comments received.

Key Issue I – Public transport and congestion

- Refer to home working and expansion of broadband provision.

Officer response:

Agree – The JCS recognise that working arrangements have changed and more people are deciding to work from home. In order to allow this to be an option to all, broadband infrastructure should be available to all communities in the JCS area.

- Refer to the possibility of an ultra-light railway connecting Gloucester and Cheltenham.

Officer response:

Noted.

Key Issue J – Flood Risk

- Refer to risk from both pluvial and fluvial flooding, and to the risks associated with development on or close to high flood risk areas.

Officer response:

Agree – The JCS recognise the sensitivity of flooding in the JCS area following the 2007 floods. The location of development will be subject to the tests within PPS2 and the SFRA2 will also identify complex flood risk assessments for some broad location sites.

Key Issue K – Risk to natural environment assets.

- Refer to the Green Belt.

Officer response:

Noted – The Green Belt review will identify areas of the Green Belt which perform well and less well to the functions set out in PPG2.

Key Issue L – Climate Change

- Refer to the reuse and adaptation of heritage assets (in accordance with PPS5).

Officer response:

Noted.

Key Issue M – Provision and protection of cultural, leisure and tourism offers

- Refer to major sporting facilities such as Cheltenham racecourse.

Officer response:

Noted.

Key Issue N – Providing for inclusive communities.

- No comments.

Vision

Six of 41 respondents agreed with the Vision and two respondents disagreed. The majority of respondents (80%) sought clarification on specific issues or suggested alternative wording.

- Achieve a better balance between urban and rural issues.

Officer response:

Agree – A rural strategy will be prepared which will focus on the need of the rural communities to ensure that development will be provided within both urban and rural locations.

- Include the Green Belt, affordable housing, education, employment, rural public transport, agriculture/forestry and the need to sustain rural services as key elements of a Vision for the JCS area.

Officer response:

Noted.

- Consider the status/hierarchy of settlements.

Officer comment:

Agree – A rural strategy will be prepared alongside a settlement audit. This will enable the JCS to identify suitable levels of development within the rural areas.

- Consider the difference between housing 'need; and 'demand' (in accordance with Strategic Objective 3, housing).

Officer response:

Agree – The JCS development management policies will clarify these issues in accordance with the requirements of PPS3.

- Refer to the value of the existing natural and built environments in attracting business investment/job creation.

Officer response:

Agree – The JCS area is a pleasant and attractive part of the country which should be emphasised within the JCS to attract future investment and new development.

- Refer to opportunities for improved bus/coach routes and better rail services with stations redeveloped to become destinations and add capacity.

Officer response:

Noted.

- Refer to flood prevention, drainage maintenance, flood management and locally generated green energy.

Officer report:

Noted – Such details will be referred to in more detail within the JCS development management policies and the supporting evidence base.

Strategic Objectives

Four of the forty-one respondents fully agreed with the Strategic Objectives and one respondent disagreed. The majority of respondents sought clarification on specific issues or suggested alternative wording.

General comments which apply to all Strategic Objectives are summarised first, followed by comments that were specific to particular Strategic Objectives.

- Achieve a better balance between urban and rural issues. Specifically, investment in agriculture, increased agricultural output and increased/secure local food production were all suggested as key Strategic Objectives for the JCS area.

Officer response:

Noted.

- Include green energy generation as a Strategic Objective.

Officer response:

Noted.

- Consider the deliverability of the Strategic Objectives in light of the current economic climate.

Officer response:

Noted – although the economic climate is likely to change over the 20 year plan period.

Strategic Objective 1 – Regeneration

- Consider regeneration outside, as well as inside, core urban centres (including villages and rural settlements) and uncertainty of investment resulting from the current economic climate.

Officer response:

Agree – The rural strategy and settlement audit will help identify which areas are capable of enabling additional future development.

- Monitor investment into deprived wards and evaluate the impacts to help direct subsequent initiatives.

Officer report:

Noted.

Strategic Objective 2 – Jobs and Economy

- No comments received.

Strategic Objective 3 – Housing

- Refer to the provision/improvement of infrastructure (including transport, social, green, etc) through new housing development and to catering for the disabled community.

Officer response:

Agree – Infrastructure provisions will be required with any development to assist the new and existing communities.

- Several respondents suggested that redeveloping brownfield sites before Greenfield sites should be a Strategic Objective. Other respondents suggested that urban areas do not have capacity for the necessary homes and employment, so a phased approach including development of peripheral ‘major growth locations’ should be considered with a view to securing associated infrastructure improvement.

Officer response:

Noted – It is likely that strategic developments within the JCS will be phased to ensure that adequate infrastructure is provided.

Strategic Objective 4 – Skills and Education

- No comments received.

Strategic Objective 5- Access to services and healthcare

- Refer to the disabled community as a special interest group.

Officer response:

Noted.

Strategic Objective 6 – Transport

- Refer and give prominence to the M5 as a strategic gateway.

Officer response:

Noted.

- Include the improvement of public transport in rural areas (to reduce private car usage) as a Strategic Objective.

Officer response:

Noted – LTP3 will focus on this issue in more detail. However, the JCS recognise the importance for all communities to have access to public transport.

Strategic Objective 7 – Flooding

- Prohibit development on flood plains, or on areas likely to flood, or on areas which might prompt flooding elsewhere, considering both fluvial and pluvial flooding.

Officer response:

Agree – The JCS will ensure that suitable flood mitigation measures are considered when developing in flood risk areas. In addition, the tests set out in PPS25 should be adhered to and the evidence within SFRA2 can assist with FRA’s.

- Integrate flood planning with planning of the natural environment/land management to reduce and mitigate the effects of flooding – e.g. plant woodland uphill or housing to reduce run off.

Officer response:

Noted.

Strategic Objective 8 – Natural Environment

- Refer to the Green Belt and ensure language is in accordance with PPS5.

Officer response:

Noted.

Strategic Objective 9 – Climate Change

- No comments received

Strategic Objective 10 – Culture, Leisure and tourism

- Refer to the areas world-class sporting and cultural festivals and to the canal corridor.

Officer response:

Noted.

General Comments

60 responses were received under General Comments. Responses covered a range of issues from spelling and grammar, additional wording and more specific issues and topics which were considered important to the *Part 1* document.

- Provide explanation of the evidence that has informed Part 1.

Officer response:

Noted.

- Explain how the Vision and Strategic Objectives will be delivered, by whom and when (particularly in light of the current economic climate and public sector funding cuts).

Officer response:

Noted.

- Achieve a better balance between urban and rural issues.

Officer response:

Agree – the rural strategy will create a better balance in the JCS and will consider all areas within the JCS area.

- Promote the M5 corridor as the areas major transport link to the rest of the UK. Support the provision of a new train station between Gloucester and Cheltenham.

Officer response:

Noted – LTP3 focuses on these issues in more detail. The JCS are preparing an infrastructure delivery plan which will identify future infrastructure requirements to assist an increasing population.

- A large number of respondents expressed concerns over the future of Bishops Cleeve and land at Leckhampton/Shurdington which were identified as Areas of Search for Sustainable Urban Extensions in the South West Regional Spatial Strategy. Such responses sought to protect these areas from development due to concern for Green Belt, flooding, traffic and landscape issues, for example.

Officer response:

Noted – all of these issues will be considered when potential Broad Locations are identified.

- The permanent line of parked buses along the Promenade is inhibiting and should be removed and the Promenade paved as pedestrian area, restoring what is now a congested traffic route to a major public space.

Officer response:

The relocation of the bus terminals are being considered as part of Cheltenham Development Taskforce.

- Traffic congestion and pollution in the entire JCS area can be tackled by balancing existing communities, rather than creating new balanced communities. The existing ones should be given adequate provision of green transport facilities.

Officer response:

Noted. Financial provisions from new developments can contribute to new and existing infrastructure. The JCS will ensure that infrastructure provisions and community facilities are inter-connected to create vibrant balanced communities.

- Reference is made to the considerable identified need for homes, especially affordable homes across the JCS, yet there is no evidence to back this up.

Officer response:

Noted – A mixture of market housing and affordable housing will be provided across the JCS area. A Strategic Housing Market Assessment has been produced by Gloucestershire County Council working with the six authorities which comprise Gloucestershire. The report forms part of the JCS evidence base and can be used to assess housing need and demand in order to develop policies.

- The location for new homes cannot be made entirely within the existing urban areas. The issue should recognise that the most sustainable locations for growth at the required scale will include peripheral urban extension locations, including land at Tewkesbury.

Officer response:

Agree – Due to the urban capacity of the built up JCS areas, it is recognised that peripheral development would be required to accommodate the future populations. The strategic development scenarios which will be consulted upon in the developing preferred options

consultation will illustrate broad locations which will form strategic developments across the JCS area.

- The flood and water management proposal provided by the Severn and Avon Valley combined Flood Group should be used as a Supplementary Planning Design document across the JCS area.

Officer response:

Noted – Any supplementary planning documents will be published following the JCS. At this stage of the JCS it has not been agreed which and how many supplementary planning documents will be required to support the JCS and its core policies.

- Is the impact on green belt different if houses were attached to the village rather than an urban extension?

Officer response:

Noted – The Green Belt Study for the JCS area will identify which areas of the Green Belt are most and least achieving the five purposes which are set out in PPG2. This will help establish if those areas on the edge of existing built up areas contribute significantly to the purposes of the Green Belt.

- The document is superficial, the issues identified were meaningless and that the JCS is merely treading water and filling a gap as the LDF cannot move forward without clear guidance. This is just a stop gap to deal with current housing applications.

Officer response:

Noted – The JCS will replace the policy void following the abolition of the RSS. The JCS is now required to identify future housing/employment sites for the next 20 years based upon local need and a supporting evidence base.

- Climate Change - Although volume house builders have a responsibility to devise and develop layouts and dwelling types that are able to make a positive contribution towards a low-carbon future, the local authority should seek to have a more reconciliatory stance to resolving local issues sharing best practice and 'gap funding' renewable energy projects where applicable (i.e. Combined Heat and Power Systems).

Officer response:

Noted – Such issues will be considered and encouraged in development management policies.

24 Recommended Reading

Respondents highlighted the following documents/initiatives for the attention of the JCS team:

- Cheltenham Festival's Annual Review
- Gloucestershire County Council's Research and Intelligence Unit Population Report
- Circular 04/2007: Planning for Travelling Showpeople
- PPS5: Planning for the Historic Environment
- Policies for Spatial Plans section 4.3 – Planning Officers Society, 2005
- Strategy for England's Trees Woods and Forests
- UK Biodiversity Partnership, 'Conserving Biodiversity in a changing climate: guidance on building capacity to adapt' (2007)
- Natural Environment and Rural Communities Act 2004
- DEFRA's guidance for Local Authorities on Implementing the Biodiversity Duty (May 2007).

E. Outcomes of Consultation Activities

24 Common ground and competing viewpoints – Issues and Key Questions

The consultation has highlighted an incredibly broad range of issues – both complementary and competing – which the JCS must seek to balance in accordance with best planning practice and the requirements of PPS1 *Delivering sustainable development*. Key areas of common ground and disagreement include but are not limited to the following:

Common ground

- Support for the principal of joint working between the three JCS authorities and cooperation with neighbouring authorities.
- The need to prepare for, adapt to, and mitigate the impact of climate change – particularly with regards to flooding – and to secure socially, economically and environmentally ‘sustainable development’.
- The need to address and improve rural and urban areas in a balanced way.
- The need to provide adequate social infrastructure, transport, jobs and services for existing populations and any new development.
- The need to plan for employment, education and training for a secure economic future.
- The need to address inequalities in wealth, housing, education, employment and infrastructure provision.
- The need to link any housing development to employment and to local housing need (e.g. families and the elderly).
- The need for high design and energy standards in all aspects of development, at all scales, from the proposed urban extensions to street furniture.
- The need to provide good access to the countryside and green/open spaces – and the Green Infrastructure approach as one of a suite of methods to help secure it.

Competing viewpoints / areas of tension

Sustainability	
The need to secure socially, economically and environmentally ‘sustainable development’.	Widely differing definitions of what is ‘sustainable development’.
Strong support for the principal of sustainable energy generation.	Significant opposition to visible/intrusive sustainable energy sources, particularly in rural areas or the AONB.
<p>Calls to reverse the decline of rural settlements and secure sustainable rural communities – without compromising their character.</p> <p>Concern for demographic change in rural areas (the pricing-out of young families).</p>	<p>Rural settlements’ vicious circle of declining services/employment, poor transport connections and ageing populations – all contributing to a common view that these are not sustainable locations for development.</p> <p>Frequent opposition to any significant rural development; and the failure of small-scale development to secure population thresholds large enough to support the desired local services.</p>
National and regional planning	
Perceived inadequacies in evidence for the growth levels (and SUEs) set out in the RSS, and resulting calls for the JCS to stand firm in opposition to central growth targets.	Statutory requirements for the JCS to be in accordance with national and regional planning policy.
Calls to provide for local community needs, not regional housing targets.	Population mobility, a free market in housing, and the JCS area’s continued appeal to residents of other towns and regions.

Perceived inadequacies in the floodplains defined by the Environment Agency (EA) following local experiences in 2007.	Statutory requirement for the JCS to work with the EA and EA data.
The housing market	
<p>Strong concern for housing affordability.</p> <p>Calls for the conservation of natural/built environments, and brownfield-before-greenfield development.</p> <p>Cynicism for the profit motive of developers.</p>	<p>Perception that housing need cannot be accommodated on brownfield sites alone.</p> <p>Calls for the phased development of brown/greenfield sites to ensure housing delivery, affordability and choice.</p> <p>Technical and financial constraints on the development of brownfield land.</p> <p>Likely continued growth in housing demand, primarily resulting from the UK's historic failure to build adequate new housing, plus the decline in household size and longer life-expectancy.</p>
The negative impact of the current recession on development activity/viability and housing demand.	The long-term view of the JCS to 2026, covering multiple economic cycles.
<p>Calls for the provision of family housing in preference to flats.</p> <p>Calls for the conservation of urban and rural character and heritage.</p>	<p>Calls for higher density housing in urban areas to deliver more housing per unit area.</p> <p>The perceived suitability of urban brownfield sites for flatted development.</p> <p>The perceived suitability of urban-edge greenfield sites for family housing development.</p>
Calls for limited development of affordable, family housing in rural areas for local people – e.g. 10-20 houses per village was commonly cited.	<p>The need to provide affordable housing through development of market housing.</p> <p>Frequent opposition to any significant rural development.</p> <p>Misperception of the amount of housing such a strategy would deliver (e.g. if averaged across the 65 settlements in Tewkesbury Borough, only 650-1,300 new dwellings would be provided for a population of more than 300,000).</p> <p>Population mobility, a free market in housing, and the JCS area's continued appeal to residents of other towns and regions.</p>
Historic failure to address the needs of Gypsies and Travellers, and their right of access to social infrastructure.	Historic concern from the settled community for the location and concentration of sites, and the impact on areas of environmental designation.

25 Common Ground and competing viewpoints – Part 1 Online Consultation

The consultation revealed little objection and some support for the materials presented. However, a broad range of issues were put forward for further consideration and a substantial number of specific clarifications and suggestions were made which the JCS team must seek to balance in accordance with best planning practice and the requirements of PPS1, Delivering Sustainable Development.

From the 297 comments received, 60% did not offer specific support or opposition to a concept, but instead answered 'Other' and frequently provided further commentary. There will be another opportunity to comment on the JCS Part 1 in the *Developing Preferred Options* consultation in December 2011.

The most common issues raised include:

- The need to balance rural and urban issues and ambitions.
- The need to promote the positive features of the area as well as addressing the negative.
- The need to provide a clear hierarchy of settlements.
- Concern for flooding, heritage and environment issues.
- The need to base Part 1 on clear evidence. It should be noted in response to this point that all evidence will be provided in supporting documents but not within the constituent sections of Part 1 which are intended to provide succinct and readable summaries of that evidence, not the evidence itself.

26 Consultation Activities in 2011

Following the *Issues and Key Questions* and *Part 1* consultations, the JCS team have been undertaking many consultation activities in preparation of the *Developing Preferred Options* Consultation. The details below give an indication of the additional consultation events which have taken place during 2011.

Event	Audience	Outcome
Cross Boundary Programme Board (monthly meeting)	JCS Chief Executives & Strategic Directors	JCS updates and decision making.
Members Steering Group seminars	Elected members	JCS updates.
Parish Council seminars/meetings	Parish councillors	Question and Answer session on the progress of the JCS.
SHLAA site assessment panels	Housing Market Partnership	Discuss the site assessment summary, general SHLAA and the housing trajectory.
Broad Location developer meetings	Various developers, consultancies, land owners and specific consultees.	Discussion of broad location sites.
Three Bridges Neighbourhood Partnership	Members of three Bridges Neighbourhood Partnership	Discussion about the JCS in the context of Gloucester City Plan consultation.
Member training sessions	All elected members and MP's across the JCS area.	Discussed emerging evidence base for the JCS – Green Belt Review, SHLAA and SFRA2.
External meeting	Cheltenham Local Strategic Partnership	Briefing on JCS activities and update on key milestones.

Tewkesbury Borough Council	Elected Tewkesbury Borough members	Question and answers with members on the JCS.
Matson and Robinswood Neighbourhood Partnership	Members of the R&M NP	Discussion about the JCS in the context of the Gloucester City Plan consultation.
Parish and town council presentation	Members	Raising awareness of the JCS and its progress.
External meetings	Leg Lag and Save the Countryside	Update of the JCS
Meeting with Gloucestershire Rural Community Council	Officers of GRCC	Advised of JCS autumn/winter consultation and requested GRCC assistance and expertise in engaging with rural communities during consultation.
Meeting with political groups	Elected members	Discuss the emerging proposals for the JCS.
JCS newsletter	Elected members and general public	Update of the JCS

27 Next steps

The JCS team are analysing this report alongside all other evidence gathered with a view to developing options, for further public consultation in December 2011. The consultation is anticipated to include a revised Part 1 and will identify Broad Locations for development around the periphery of existing urban areas.

A rural strategy and settlement audit will also be prepared to address the rural communities within the JCS area.

28 Lessons learnt

Observation	Lesson learnt / outcome
Event locations and attendance	
Need to maximise attendance and ensure a range of communities are reached	Ongoing review of all event locations. Consider including new areas – e.g. Barton in Gloucester Outdoor exhibitions (Cheltenham Promenade and Gloucester Kings Walk) were popular, however time of year and weather should be considered when choosing venues
<i>Public</i> Some complaints received regarding notice period for events and meetings	Endeavour to provide more notice, and to maximise publicity (see below)
Attendance at events was often poor after 7pm	Review opening times to ensure efficient use of Officer time and make the exhibitions as effective as possible. E.g.

Some exhibitions benefited from 'passing trade' attracted by other events happening at the same time and location	public exhibitions to close at 7pm, rather than 8pm Consider specifically piggy-backing other events to increase attendance and share costs where possible. This principle particularly applies to other public consultation events that may be happening in the JCS area
<i>Members</i> Need to maximise attendance by Members Better response obtained from Members by letter than email	Continue to maintain up-to-date list of all Council meeting dates and plan consultation events accordingly Inform Members of JCS process and activities by letter – consider duplicate email clearly flagged as such
Security: One meeting of the Member Steering Group was attended by uninvited members of the media	Provide list of invited attendees and check attendance on the day to ensure media contact is managed appropriately by the CBC Communications Team
Publicity	
Several Parish Councils provided excellent publicity promoting local exhibitions (at no cost to the JCS team)	Provide adequate notice and encourage Parish Councils to promote events in all correspondence. Where Parish Councils do not exist, Members could play a vital role
Coverage in the press was good and needs to be maintained	Continue to work with all local media
Resources and materials	
Some exhibitions were initially over-staffed, making it difficult for visitors to approach the stand and engage. Officers were sent home accordingly, leaving adequate cover, but this could be improved. Staff observed a cycle where more interest was attracted when people were seen talking to officers, and less when 'spare' officers were waiting for interest	Ongoing review of staffing to ensure efficient use of Officer time and to maximise the exhibition's appeal to the public. As a rule, stands need a maximum of two officers, or three in the busiest locations (G/C/T town centres) at the busiest times (Saturday lunchtime / afternoon)
Having a variety of means to get involved proved very popular with the public. Post-it notes, dot-maps and questionnaires were all very successful. Appropriate deposit boxes for questionnaires were not always provided however	Provide neat, clearly-labelled deposit boxes for questionnaires at all events
Some respondents were unsure of terminology used in the questionnaire despite efforts to employ plain English – specifically: 'public realm'	Ongoing review of materials for consistent use of plain English
Dot-maps worked well as posters, but also when placed on tables with seating where they became centres for some prolonged and interesting debates	Provide tables and chairs with dot-maps where possible
The A3 constraints map was not easy to read	Review colour-coding of constraints map

for some respondents	
Some respondents requested more detailed, local maps to aid discussion of local issues	Consider provision of locally-relevant maps at a larger scale than the JCS area maps. Balance provision with need to maintain strategic focus for JCS
Display material/posters worked well, however Officers felt the amount of text could be reduced and the amount of graphics/images increased accordingly to make the materials more eye-catching to passers-by	Consider the balance of text/images for posters and pop-up branding banners at future exhibitions. Graphics/images attract attention, but text is required by those who do not wish to speak to Officers but prefer to stand and read
Some display stands were looking tired by the end of the consultation period	Replace any damaged display stands, or rotate for newer ones as necessary

Joint Core Strategy Issues & Key Questions – Consultation Report Appendices

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- APPENDIX B – Public events short questionnaire
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- APPENDIX F – Parish Council events attendance log
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- APPENDIX H – Constraints maps
- APPENDIX I – Strategic objectives
- APPENDIX J – Online Questionnaire (Part 1 consultation)
- APPENDIX K – Spatial Portrait (Part 1 consultation)
- APPENDIX L – Key Issues (Part 1 consultation)
- APPENDIX M – Vision (Part 1 consultation)
- APPENDIX N – Developing the Spatial Options: Stakeholder and Parish Council consultation.

APPENDIX A – PUBLIC EVENTS ATTENDANCE LOG

Approximately 911 people attended the manned exhibitions, as shown below. The ‘big three’ exhibitions in Gloucester, Cheltenham and Tewkesbury centres (highlighted in bold) were particularly well-attended.

Day	Date	Time	Venue	Authority	No. of attendees
Mon	23rd Nov	11am - 8pm	Gloucestershire College - Cheltenham	Cheltenham	35
Tue	24th Nov	11am - 8pm	Gloucestershire College - Gloucester	Gloucester	25
Weds	25th Nov	9am - 5pm	Oakley Community Resource Centre	Cheltenham	20
Thu	26th Nov	-	-	-	-
Fri & Sat	27th + 28th Nov	10am - 6pm	Promenade, Cheltenham	Cheltenham	190
Mon	30th Nov	3pm - 8pm	Quedgeley Parish Council Office	Gloucester	5
Tue	1st Dec	3pm - 8pm	Bishops Cleeve Council Office	Tewkesbury	30
Weds	2nd Dec	3pm - 8pm	Brockworth Community Centre	Tewkesbury	37
Weds	2nd Dec	3pm - 8pm	Apperley Village Hall	Tewkesbury	8
Thu	3rd Dec	3pm - 7pm	Cheltenham Area Civil Service Sports Association	Cheltenham	70
Fri & Sat	4th + 5th Dec	9am - 6pm	Unit 33, Kings Walk, Gloucester	Gloucester	150
Mon	7th Dec	3pm - 8pm	Lysons Hall, Hempsted	Gloucester	20
Tue	8th Dec	3pm - 8pm	Highnam Old School	Tewkesbury	14
Tue	8th Dec	3pm - 8pm	Alderton Village Hall	Tewkesbury	8
Weds	9th Dec	3pm - 8pm	Innsworth Community Hall	Tewkesbury	12
Weds	9th Dec	3pm - 8pm	Abbey Fields Community Centre, Winchcombe	Tewkesbury	9
Thu	10th Dec	3pm - 8pm	Brizen Young People's Centre, Cheltenham	Cheltenham	62
Fri & Sat	11th + 12th Dec	10am - 6pm	Tewkesbury Main Library	Tewkesbury	216
TOTAL					911

APPENDIX B – PUBLIC EVENTS SHORT QUESTIONNAIRE

PLEASE ANSWER ANY OR ALL OF THE FOLLOWING QUESTIONS.

1. What are your priorities for development in the JCS area? Please select up to six options from the list below.

- Affordable housing
- Education
- Employment
- Community facilities
- Cultural facilities
- Formal sports and recreation
- Informal outdoor recreation and general open space
- Flood prevention
- Walking and cycling improvements
- Public transport improvements
- New highways and roads
- New rail investment
- Improved streets, squares and public spaces
- Climate change measures
- Renewable energy initiatives
- Other (please specify) _____

2. If you could choose only one, top priority from the list above, what would it be?

3. Should urban areas be expanded to accommodate growth? If so, where?

4. How/where should Gloucester accommodate future development?

5. How/where should Cheltenham accommodate future development?

6. How/where should Tewkesbury town and the surrounding rural areas accommodate future development?

7. Have we missed anything? Let us know if there is anything else that you feel requires specific policies within the JCS.

Please go to www.gct-jcs.org to read the Issues & Questions Document in full, and to provide more detailed feedback.

Please provide your contact details below if you wish to be kept informed of JCS work. You are not obliged to do so.

Name: _____

Address: _____

Postcode: _____

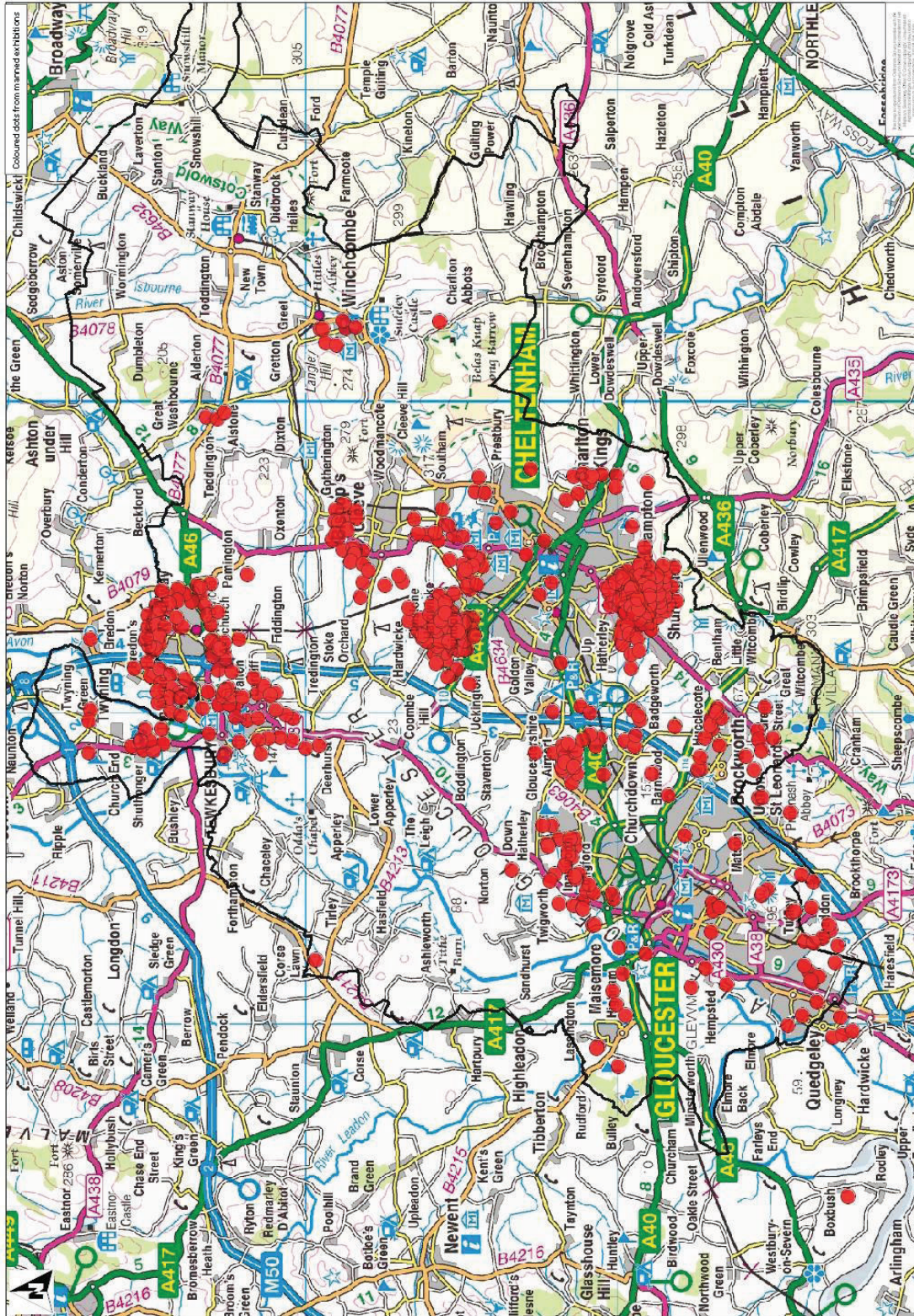
Email: _____

Daytime tel: _____

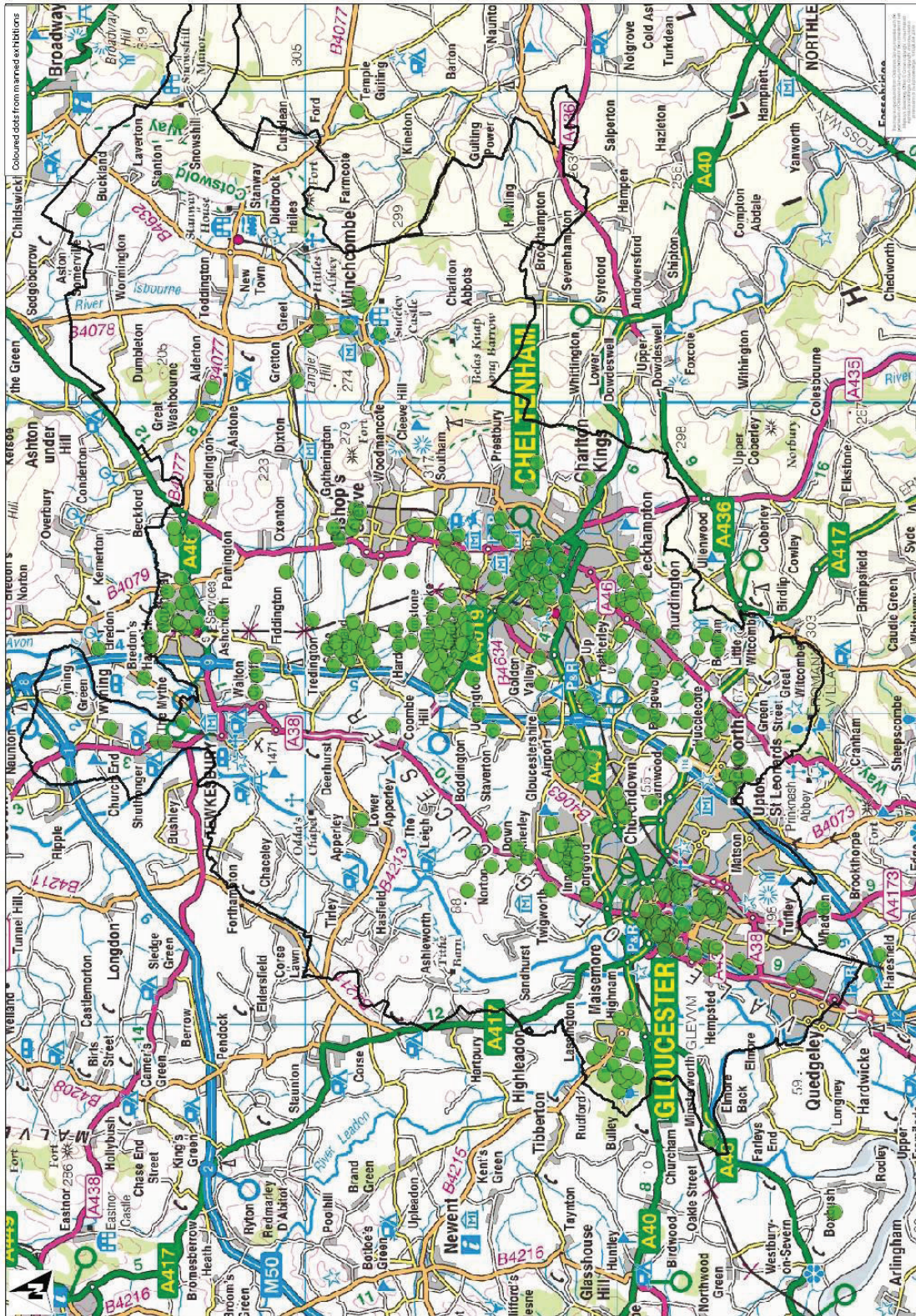
Please send responses to JCS Team, Municipal Offices, Promenade, Cheltenham, GL50 9SA by **FRIDAY 19th FEBRUARY 2010**.

Respondents placed green dots where they felt development was appropriate and red dots (overleaf) where inappropriate. The combined map is shown on the third page.

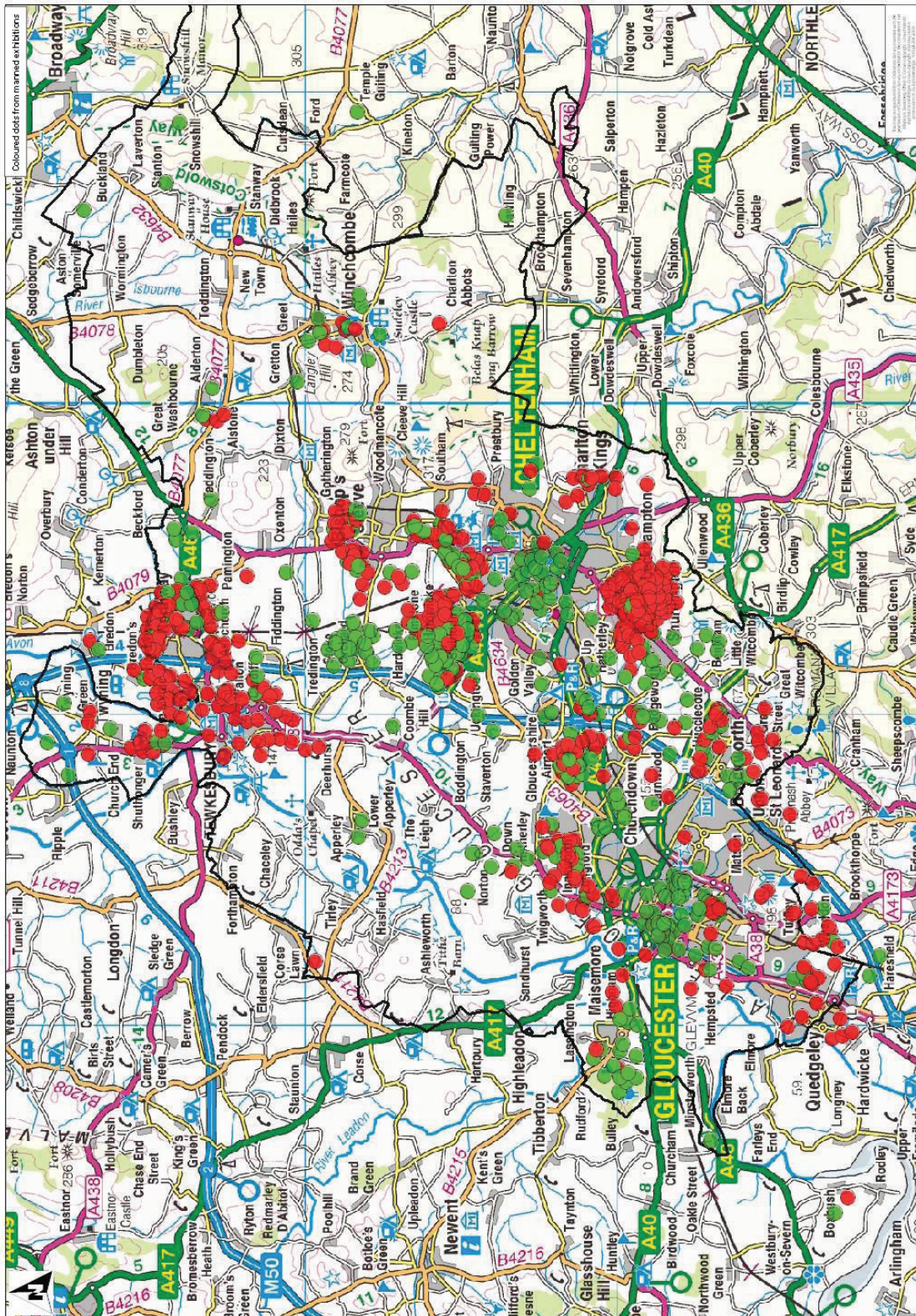
Red dots: areas viewed as inappropriate for development.



Green dots: areas viewed as appropriate for development.



Green and red dots combined.



NB: the primary purpose of this exercise was to engage visitors and stimulate debate, **not** to establish an accurate 'development map'. As the former, the exercise was very successful; as the latter it is too limited to be considered reliable evidence of support/opposition for development of any specific site. However, the response maps are reported here due to their popularity, for information, and as a starting point for more robust analysis. See the main report (pg 6) for more information.

APPENDIX D – SUMMARY OF POST-IT NOTE RESPONSES

A total of 736 comments were collected on post-it notes across all the manned exhibitions. These were logged according to their place of origin, and categorised by type in line with the expected chapter breakdown of the draft JCS. A summary of the issues raised follows below.

Ch.	Subject	Summary of comments
3	Spatial portrait	<ul style="list-style-type: none"> Gloucester and Cheltenham were seen as needing to complement one another socially, economically and environmentally
4	Vision	<ul style="list-style-type: none"> Support was expressed for the principal of joint working between the three authorities. Concern was expressed for Councillors failing to listen to the public and for the Councils' inability to deliver what is required Generally, respondents used this exercise to raise specific concerns rather than to describe a high-level vision. However, elements of a vision can be seen in all the sections below
5	Development in the JCS area	<ul style="list-style-type: none"> Concerns were raised over the accuracy of, and evidence behind, the RSS growth figures. Some respondents wanted no new housing at all, but others saw a lot of need while still questioning the levels of growth proposed Strong support was expressed for re-using brownfield sites and derelict/empty properties (incl. those above shops) before greenfield sites are developed Strong support was expressed for making better use of existing housing stock – tackling empty properties, under-occupation and second homes Support was expressed for protecting the green belt – maintaining separation between settlements (e.g. Gloucester/Cheltenham, and Bishops Cleeve/Gotherington/Cheltenham), protecting the environment and the means of food production However, there were also dissenting voices suggesting building in-between Gloucester/Cheltenham (“it’s inevitable and the gap serves no real purpose so why fight it?”) or Bishops Cleeve/Cheltenham. In both locations, connections and services are good and the green belt is seen as already devalued – developing here was seen as a way to “save the good green belt” elsewhere Conflicting opinions were raised over the best means of providing for growth, some favouring large scale development (“better than small additions that don’t allow proper planning”) and a new town; while many respondents preferred to keep development small (spreading the burden and keeping rural services alive as well as re-using town centre sites) Accordingly, support was expressed for providing limited affordable new housing in villages and rural areas where local people have been priced-out and services have declined, but only within a scale appropriate to the existing settlement Strong support was expressed for providing sustainable transport before starting any new development Many respondents were concerned about / warned against building on or near the floodplain <p>OTHER COMMENTS:</p> <ul style="list-style-type: none"> Build more new housing, ensure good sizes of homes/gardens and high build-quality, maintain local identity (avoid generic styles) Build at higher densities (town houses, no more flats) in urban areas Prioritise social housing within urban areas and more houses in villages Ensure a good social mix in new developments

		<ul style="list-style-type: none"> ▪ Jobs first, housing second ▪ Plan without boundaries ▪ Be imaginative, throw out the rule book ▪ Incorporate comments from previous consultations
5.1	Gloucester City	<p>GENERAL</p> <ul style="list-style-type: none"> ▪ Strong support was expressed for using Gloucester's heritage, maintaining and respecting its character, and ensuring new development is sympathetic to historic buildings ▪ Strong support was expressed for maximising brownfield sites (as per comments summarised above) ▪ Strong support was expressed for improving links between the city centre and docks, as well as for regenerating the city centre so its focus doesn't shift to the docks ▪ Many respondents wanted to see better shopping (independents <i>and</i> chains), cafes, bars, nightlife, a theatre or cultural centre, and "more things to do" ▪ Cheap parking was seen as a way to encourage visitors/spenders ▪ More housing in the city centre was seen as a way to keep it active around the clock, and improve security/safety (esp. at night) ▪ Many respondents wanted more jobs to be created <p>SITE-SPECIFIC COMMENTS</p> <ul style="list-style-type: none"> ▪ B&Q site suggested for re-use as housing / theatre ▪ Old College site suggested for re-use as housing / theatre / cultural centre ▪ Railway triangle suggested for re-use as a park ▪ SW Gloucester "has had its fair share of growth"
5.2	Cheltenham Borough	<p>GENERAL</p> <ul style="list-style-type: none"> ▪ Many respondents felt Cheltenham has expanded too much already, and has enough shops, pubs and clubs – further responses to general development (and SUE) proposals for Cheltenham are summarised in Section 5, above ▪ Other respondents wanted to see more retail variety and more jobs created, as well as a new secondary school ▪ Cheap parking was seen as a way to encourage visitors/spenders <p>SITE-SPECIFIC COMMENTS</p> <ul style="list-style-type: none"> ▪ Brownfield sites suggested for housing development include: Baylis, Haines and Strange site, old 'black and white site, land near St Peters Church, land behind bingo hall, Runnings Road employment land, Cheltenham FC site (if club moved to racecourse), under-used shops/flats above Churchill Rd ▪ Greenfield or 'already over-developed' sites flagged for protection include: Hunting Butts, Starvehall Farm, New Barn Lane, Lynworth ▪ Support was expressed for CBC staying at the Municipal Offices ▪ Concern was expressed for provision of a car park at the lido ▪ The Eagle Tower was described as an eyesore
5.3	Tewkesbury Borough	<p>GENERAL</p> <ul style="list-style-type: none"> ▪ Concern was expressed over further development in and around Tewkesbury town, with particular concern for development in or near the floodplain, and a general desire to protect the green belt (as summarised in Section 5). New housing was seen as having eroded the character of Tewkesbury ▪ Significant support was expressed for providing affordable new housing in villages and rural areas where local people have been priced-out and services have declined, but only at a scale appropriate to the existing settlements ▪ Need was expressed for another supermarket to rival Morrisons ▪ Cheap parking was seen as a way to encourage visitors/spenders ▪ Sheltered and smaller homes were seen as necessary in Winchcombe – related to the need to consider the elderly/downsizers more generally in the Borough

		<p>SITE-SPECIFIC COMMENTS</p> <ul style="list-style-type: none"> ▪ Brownfield/other sites suggested for housing development include: Stoke Orchard, the airport site, Tewkesbury, south of Tewkesbury ▪ Greenfield, flood-prone or 'already over-developed' sites flagged for protection include: south of Alderton, Frogfurlong Lane, the Mitton land ▪ "Despite what the EiP says, there are no employment prospects, dreadful traffic congestion, appalling lack of infrastructure and Bishops Cleeve should not have to take any more growth" ▪ "No housing within 3km of waste tips"
5.4	Urban extensions	<p>GENERAL</p> <ul style="list-style-type: none"> ▪ As summarised above, strong support was expressed for re-using brownfield sites and derelict/empty properties before greenfield sites, and for protecting the green belt / maintaining separation between settlements ▪ Significant concern was expressed about the accuracy of RSS growth figures/evidence and for the adequacy of infrastructure provision in the resulting SUEs ▪ Significant concern was expressed about flood risk – if SUEs go ahead, they must incorporate flood alleviation measures / drainage to reduce risk both in and outside developments ▪ As noted, there was disagreement about the need for more housing: "no more homes" said one, "need more homes" said another <p>SOUTH CHELTENHAM</p> <ul style="list-style-type: none"> ▪ If the SUE goes ahead, it must be complemented by adequate infrastructure including a ring road ▪ Park & Ride should not go at Brizen Farm (which is too close to Cheltenham) but at Brockworth ▪ "Development at Brizen Farm / Farm Lane should not take place: unsuitable; ill-conceived" ▪ "Development at Brizen would be beneficial" <p>NW CHELTENHAM</p> <ul style="list-style-type: none"> ▪ Strong resistance was expressed by many immediate locals, as per the general summary in Section 5, but there was some support from others for development in this area, e.g: "growth to NW Cheltenham seems sensible if growth is needed"; "low value greenbelt, if built on it would not coalesce settlements – if you don't build there, prepare to build in more sensitive sites that <i>will</i> coalesce settlements" ▪ If the SUE goes ahead, many felt it must be complemented by adequate infrastructure including J10 improvement <p>BROCKWORTH</p> <ul style="list-style-type: none"> ▪ Brockworth: has had its fair share of development, and now needs better roads/access
5.5	Priorities for development (including comments on services/skills/comm unity)	<p>GENERAL PRIORITIES (relevant site-specific issues provided in brackets where raised):</p> <p><i>Frequently mentioned:</i></p> <ul style="list-style-type: none"> ▪ Social and transport infrastructure – to address current deficiencies and to support any growth ▪ Heritage-led regeneration ▪ Town centre improvements ▪ Rural services ▪ Public transport ▪ Education ▪ Healthcare (e.g Lynworth, Whaddon, Apperley) ▪ Leisure facilities (e.g. Tewkesbury, Winchcombe, Gloucester) ▪ Employment

		<p><i>Less frequently mentioned:</i></p> <ul style="list-style-type: none"> ▪ Year-round activities and support for young people ▪ Housing/support for the elderly ▪ Quality green spaces/parks/play areas ▪ Allotments ▪ Community recycling schemes / more and better collections ▪ More and better cycle paths ▪ Cleaner streets ▪ Public art
5.6	Urban regeneration	<p>GENERAL</p> <ul style="list-style-type: none"> ▪ As summarised above, strong support was expressed for re-using brownfield sites and derelict/empty properties and for protecting the green belt, with significant concern about the accuracy of RSS growth figures/evidence and the adequacy of infrastructure provision in the resulting SUEs ▪ “A living town centre for all ages at all times” <p>SITE-SPECIFIC AREAS OF NEED</p> <ul style="list-style-type: none"> ▪ Lower High Street, Cheltenham ▪ Matson, Tredworth ▪ Bristol Road, Gloucester
6.1	Affordable housing	<ul style="list-style-type: none"> ▪ Affordable housing was seen as a priority for rural areas: “Villages need more (but not too much!) affordable housing so families stay and support local schools and services” ▪ “35% affordable housing needed not the 18% argued for at the Innsworth Appeal”. Other respondents suggested as much as 50% affordable housing, and supported lowering the threshold for affordable housing ▪ Support was expressed for mixing affordable and market housing ▪ “Stop selling council houses immediately” <p><i>NOTE: It is apparent that affordable housing was commonly defined by respondents as ‘low-cost market housing’, and not as shared-ownership, social rented or other forms of affordable housing as defined by housing/planning professionals.</i></p>
6.2	Sustainable building	<p>Sustainable building techniques or features suggested as being desirable include:</p> <ul style="list-style-type: none"> ▪ Incorporating sustainability in new development from the outset ▪ Greywater recycling ▪ Permeable driveways/hard-standing to reduce surface run-off ▪ Higher renewable energy targets ▪ CHP plants in new developments
6.3	Renewable energy	<ul style="list-style-type: none"> ▪ Higher renewable energy targets ▪ CHP plants in new developments
6.4	Flooding	<ul style="list-style-type: none"> ▪ Strong concerns were expressed over flood risk to existing properties being heightened by new development ▪ Strong opposition was expressed to building on or near the floodplain, and the accuracy of EA flood maps was questioned ▪ SUDS were seen as desirable by many, though some questioned their effectiveness, and other parallel means of flood risk alleviation were seen as necessary (e.g. river dredging, drain maintenance). ▪ Respondents felt that climate change must be accounted for in flood risk assessment and amelioration
6.5	Employment	<ul style="list-style-type: none"> ▪ Respondents felt that the location of new housing should be linked to the location of jobs, and new developments should provide their own jobs as well as housing ▪ “Jobs first, houses second”

		<ul style="list-style-type: none"> ▪ Encouraging investment and providing incentives for businesses to locate in the area were seen as desirable. Rates holidays and the engineering skills base were seen as being attractive to investors ▪ “More high-tech jobs, apprenticeships, entrepreneurship”
6.6	City and town centres	<ul style="list-style-type: none"> ▪ All city and town centres were recommended for improvement at respective exhibitions. There was a general desire for ‘better shops, bars, restaurants, leisure, culture’ etc in all centres ▪ A good mix of independent and chain stores was popular with many respondents ▪ Specific areas of concern: <ul style="list-style-type: none"> ○ Cheltenham – general decline ○ Gloucester – general decline / better link to docks ○ Tewkesbury – general decline ○ Winchcombe – risk to independents if Tesco Metro arrives
6.7	Green infrastructure	<ul style="list-style-type: none"> ▪ Strong support was expressed for preserving the green belt, AONB, wildlife corridors, urban parks and open spaces ▪ Strong support was expressed for providing new parks and open spaces in any new development ▪ It was recommended that the JCS team should liaise with Glos Biodiversity Partnership, Glos Wildlife Trust and Glos Orchard Group at every stage
6.8	Gypsy and traveller provision	<ul style="list-style-type: none"> ▪ No comments received
10	Other issues	<p>TRANSPORT</p> <ul style="list-style-type: none"> ▪ Major concerns were expressed over the ability of road infrastructure to cope with proposed housing growth ▪ Many respondents requested full-access at J10 ▪ Need was expressed for better traffic management / light phasing ▪ Sustainable transport options were seen as a vital part of planning for any new development. ▪ Public transport networks were viewed as needing improvement, and being too expensive/infrequent and not serving all parts of the County ▪ A circular bus route round Gloucester was requested, and a train/tram linking Cheltenham and Gloucester (and possibly Tewkesbury) would be popular – e.g. on the Honeybourne Line ▪ Respondents requested more and better footpaths and cyclepaths ▪ Park & Rides were suggested for: Brockworth, A417, A46, Elmbridge, Linton ▪ One respondent suggested using waterways for transport / freight <p>OTHER COMMENTS</p> <ul style="list-style-type: none"> ▪ JCS should use Parish Councils as an information source – e.g. on flooding ▪ More and better recycling (incl. plastics) is required ▪ Need for specialist care homes and wider support for those with mental/physical/learning disabilities in JCS area ▪ Need more community engagement in planning ▪ Concern was expressed over architecture/design – e.g. unsympathetic modern designs in historic areas (blue Glos College), and standard housing types in new developments

APPENDIX E – LOCATIONS IDENTIFIED AS SUITABLE FOR DEVELOPMENT IN SHORT QUESTIONNAIRE

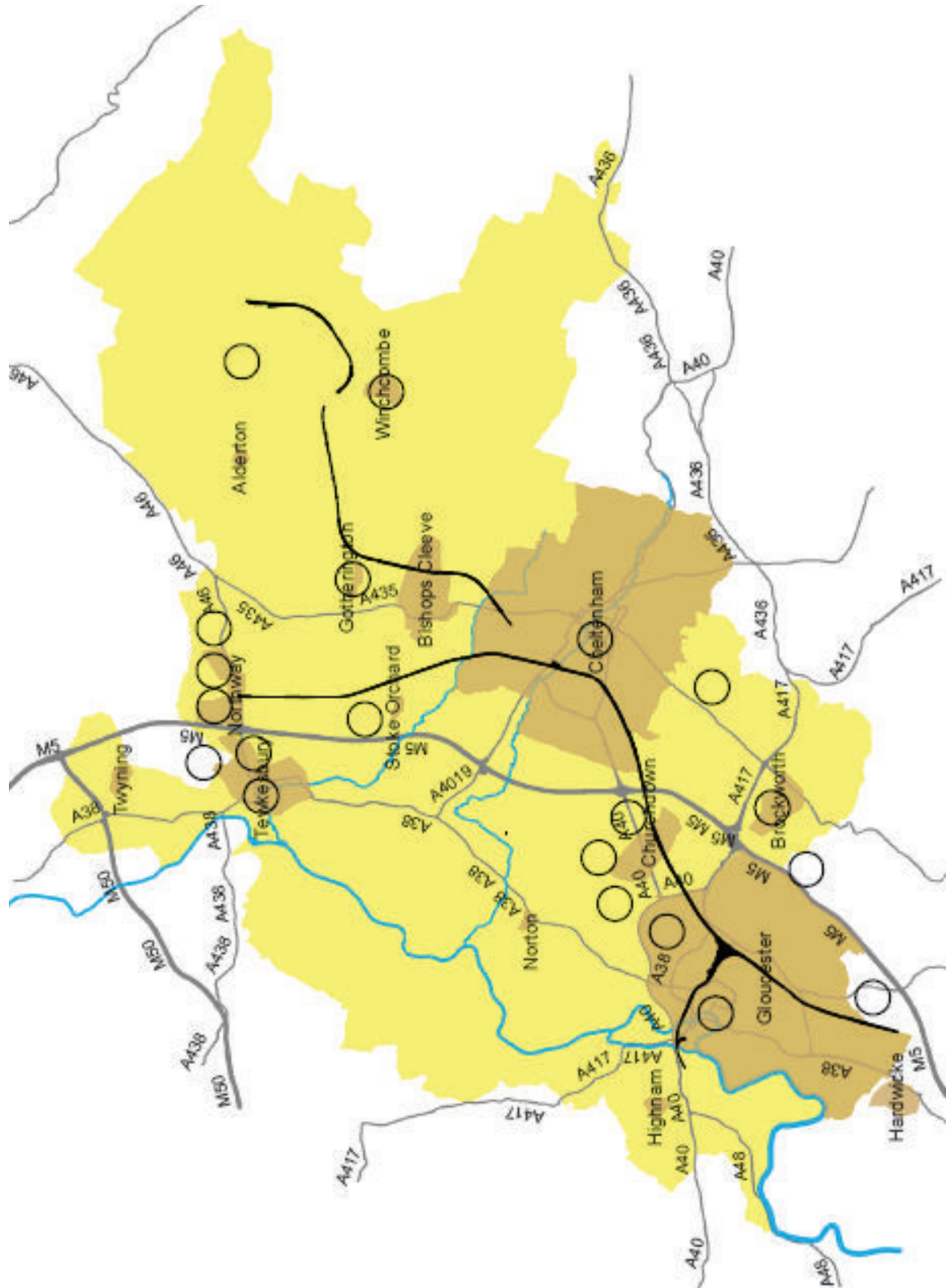
The short questionnaire (Appendix B) asked respondents to identify where they felt development would be suitable if it were to happen. Responses are listed below and plotted in the map overleaf.

Locations are listed in the table as provided by respondents. Not all locations correspond with the correct district, in line with people's individual perceptions of what constitutes their local areas.

Locations are listed and mapped without prejudice to the JCS or to any future planning applications.

Gloucester	Cheltenham	Tewkesbury
A40 east and west	A40 east and west	North of Stoke Orchard
Innsworth	Cheltenham town centre sites	Northway
Longlevens	St Paul's	Mitton
East of M5 to south of city	St George's Place	Gloucester, Worcester and Bredon Roads
Old Gloucester Road to Churchdown	Princess Elizabeth Way	Tewkesbury town centre
Brockworth	Shurdington	North of Tewkesbury
Gloucs city centre	Midwinter Allotments	Winchcombe
Railway Triangle		Gotherington
Northgate Street		Toddington
Brunswick Road		Ashchurch MOD site
Old College Buildings		Newtown
Behind the Gloucester library		East of Northway
Gloucester sports centre		Beyond Mythe towards Worcester
NE Gloucs		Ashchurch area
Longford past Staverton		
South Gloucester		

APPENDIX E cont.- MAP OF LOCATIONS IDENTIFIED AS SUITABLE FOR DEVELOPMENT IN SHORT QUESTIONNAIRE RESPONSES



APPENDIX F – PARISH COUNCIL EVENTS ATTENDANCE LOG

The five events were attended by a total of 40 representatives from 23 Parish Councils. Asterisks indicate those Parish Councils who have also submitted formal written representations:

- Alderton PC *
- Bishops Cleeve PC
- Brockworth PC *
- Charlton Kings PC
- Churchdown PC *
- Elmstone Hardwicke PC *
- Gotherington PC
- Gretton PC
- Hucclecote PC
- Leckhampton and Warden Hill PC *
- Leigh PC
- Northway PC
- Quedgeley PC
- Stanton PC
- Swindon Village PC *
- Teddington & Allstone PC *
- Toddington PC
- Twyning PC
- Uckington PC
- Up Hatherley PC *
- Wheatpieces PC
- Winchcombe TC *
- Woodmancote PC *

The following 11 Parish Councils indicated they were content to miss the events having already submitted formal written representations to the *Issues and Key Questions* document:

- Ashchurch Rural PC
- Bredon, Bredons Norton and Westmancote PC
- Brookthorpe with Whaddon PC
- Chaceley PC
- Down Hatherley PC
- Minsterworth PC
- Overbury and Conderton PC
- Prestbury PC
- Stoke Orchard PC
- Twigworth PC
- Upton St Leonards PC

A total of 20 out of 54 Parish Councils therefore declined to attend the events and have not yet submitted formal written representations. All Parish Councils will have further opportunities to contribute to the JCS, notably at the *Developing Preferred Options* stage, scheduled for October 2010.

APPENDIX G – PARISH COUNCIL PRIORITIES (quoted from *Parish Councils Consultation Report*)

1. Vision

- The JCS must:
 - Focus on local community needs, not just regional housing targets, and ensure a balanced approach to provision of employment and housing
 - Protect the environmental, rural and urban characteristics that make the JCS area (and the separate and distinctive places within it) an attractive place to live and work
 - Address rural and urban areas/issues in a balanced way
 - Encourage sustainability/green living and prepare for climate change by, for example: protecting environmental designations and limiting urban sprawl; addressing flood risk; directing development to brownfield sites before greenfield; supporting appropriate renewable energy production; supporting local and community food production
- The JCS area, its residents, workers and visitors should enjoy:
 - A high quality of life with improved open spaces, education, health and leisure
 - Thriving rural and urban communities, engaged with planning their own futures
 - Protection from flooding, and the mitigation of flood impact
 - A mixed economy (agriculture, manufacturing and services), and a highly-skilled workforce attracting inward investment
 - Affordable, well-designed housing for all – urban and rural – in mixed communities with good access to services and employment
 - Good road/rail infrastructure and traffic management. Better public transport, walking and cycling routes
 - Good access to the countryside and green spaces

2. Sustainability

- Maintain local and rural services – including through development of new housing, services, community facilities and wider infrastructure at an appropriate scale
- Support local food production – including through veg-growing schemes, preservation of productive land, provision of allotments, support for local shops/farmers
- Support local green energy production, primarily through: hydro power, geothermal, combined heat/power pumps, energy-from-waste, micro-generation. There were mixed views on the need for and impact of wind turbines and the proposed Severn Barrage
- Improve energy efficiency of existing housing stock and new-build – consider setting targets beyond those of central government policy / building regulations
- Reduce the need to travel and provide sustainable transport options including public transport and cycle routes – but must acknowledge the likely continued dominance of the private car in rural areas. Concern was expressed for failure to enforce corporate green travel plans, and for the expense of using local park and ride schemes
- Create integrated, self-sufficient communities through a combination of all the above initiatives

3. Housing

- Concern expressed over the scale and nature of housing need in the RSS – must provide housing types and numbers to suit local need (including for key workers)
- New housing provision must be linked to job creation

- New housing should be: energy efficient; of high quality design and space standards; of higher density in urban areas; and planned to create mixed/balanced communities
- 40% target for affordable housing. Support for intermediate ownership schemes.
- Affordable housing need seen as great in both urban and rural areas. Provision is required within existing settlements, not just urban extensions. Concern expressed for the young being priced-out of villages (demographic impact). Concern expressed for the limited opportunities to provide affordable housing in many villages due to: the lack of infrastructure and employment in villages; the planners' resulting view that villages are not sustainable locations for new housing; and the fact that new affordable housing can only be provided in conjunction with new market housing, suggesting a scale of development that conflicts with many villages' idea of what is acceptable ('Catch 22')
- Appropriate development in villages and rural areas accepted, but must use previously-developed land as a priority, and bring empty properties back into use (e.g. above shops)
- Consider building a new town

4. Employment

- Foster local specialisms, e.g:
 - Gloucester – Manufacturing
 - Cheltenham – Services, tourism
 - Tewkesbury – Light industry, logistics, tourism
 - Outer Areas – Tourism, home working, farming and diversification, cottage industries
- Develop a skilled workforce – focus on education, suitably targeted at the needs of current and future local employers
- Balance manufacturing and service industries, and support agriculture. Must consider the industries we don't want to attract as well as those we do
- Provide incentives for businesses to locate in the area – e.g. green technology and hi-tech industries, incubator units for new businesses
- Provide local employment, but must understand that people will not always live where they work, and some will/must commute. Also, consider accepting appropriate employment development first, and dealing with transport/access issues to the site second
- Encourage home-working – e.g. through broadband provision
- Provide compact business sites / incubator units in rural areas
- Support farm diversification
- Protect environmental and heritage assets (in their own right, but also as the foundation of the tourist industry and associated employment; and as a key reason why the area is a nice place to live/work that may attract people to start a business here)
- Re-use empty employment sites
- Support employment growth at Ashchurch (due to good rail/road links)

5. City and town centres

- All city/town centres:
 - Regeneration needed in Cheltenham, Gloucester and Tewkesbury: re-use existing buildings where possible – new is not always best, most sustainable, or in keeping with character
 - Better mix/range of quality chain stores and independent shops/markets to enhance local distinctiveness (Cirencester cited as good example) – and to create an 'experience'. This to be supported by attractions other than retail (e.g. festivals, culture) and good quality public spaces
 - Halt out-of-centre retail development (including better control of supermarket development that draws trade from town centres)

- Better access by public transport from rural areas.
- Reduce the dominance of vehicles in centres – promote pedestrian/cycle access and movement. Support well-placed park and ride schemes
- Provide free/more affordable car parking to better compete with other centres
- Make better use of vacant shop units, and empty properties above shops (e.g. for affordable housing)
- Support for more people living in town/city centres to create busy street-life around the clock, to foster sense of community, and to improve safety after dark
- Maintain provision of public conveniences
- Attract tourists, but not at the expense of the needs of locals
- Gloucester:
 - Support for comments expressed by the public. No specific additional comments
- Cheltenham:
 - Focus development on the Lower High Street
- Tewkesbury Town Centre:
 - Develop relationship between town and waterways
 - Enhance local, friendly, independent feel
 - Consider bypass to reduce air pollution/traffic problems
- Surrounding smaller and rural centres: support for shared/cooperative provision of services in neighbouring settlements. Avoid focus on towns/cities at expense of rural communities
- Bishops Cleeve and Winchcombe should not be classed as “towns”

6. Sustainable urban extensions

- Concern expressed over evidence for and scale of RSS targets, and the need for urban extensions
- Protect the Green Belt and avoid coalescence of settlements. Re-use brownfield sites and empty buildings before greenfield sites
- If development does go ahead:
 - Ensure it provides adequate social, physical and transport infrastructure to support itself, as well as addressing existing local deficiencies. Infrastructure to be in place prior to construction/occupation of housing. New development must be mixed and with a real sense of community, high design/space standards (design-out crime) and adequate open space
 - New developments should be equipped to process their own waste
 - Major development at NW Cheltenham will require full-access J10
 - Consider building a new town in preference to urban extensions
- The concentration of new development around urban areas must not be allowed to suck in capital expenditure on infrastructure to the detriment of investment required to existing infrastructure in the rural hinterland

7. Flooding

- Flood prevention and mitigation viewed as the most important planning issue in the JCS area
- New development must not increase (and should be designed to reduce) flood risk to existing properties
- Flood zones should be defined with a margin to account for climate change, and should incorporate local knowledge. There should be no building on the defined floodplain
- Flood risk assessment and flood defences to account for both fluvial and pluvial flooding

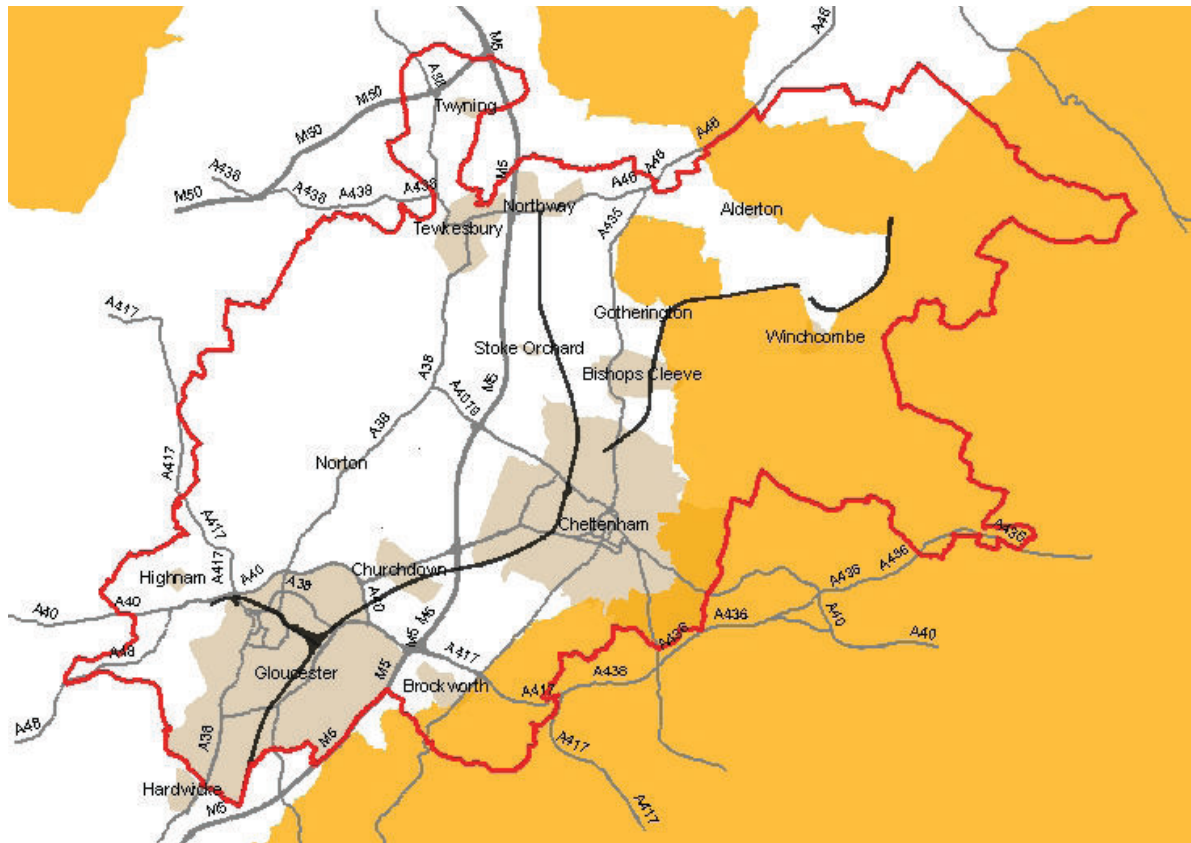
- JCS team to consider producing a Water Management Supplementary Planning Document, and imposing flood policies beyond those of central government (PPS25). Support was expressed for the Pitt Report recommendations
- Practical flood prevention suggestions included:
 - Investment in drainage infrastructure, dredging, regular maintenance etc
 - Better enforcement of rules regarding maintenance of drainage infrastructure
 - Permeable paving for roads
 - Planting schemes to control water flow
 - Grey water recycling for all new-build
 - Culverts to be built under new roads
 - Flood infrastructure/storage/SUDS can be attractive and support biodiversity as well as fulfilling flood prevention role

8. Green infrastructure

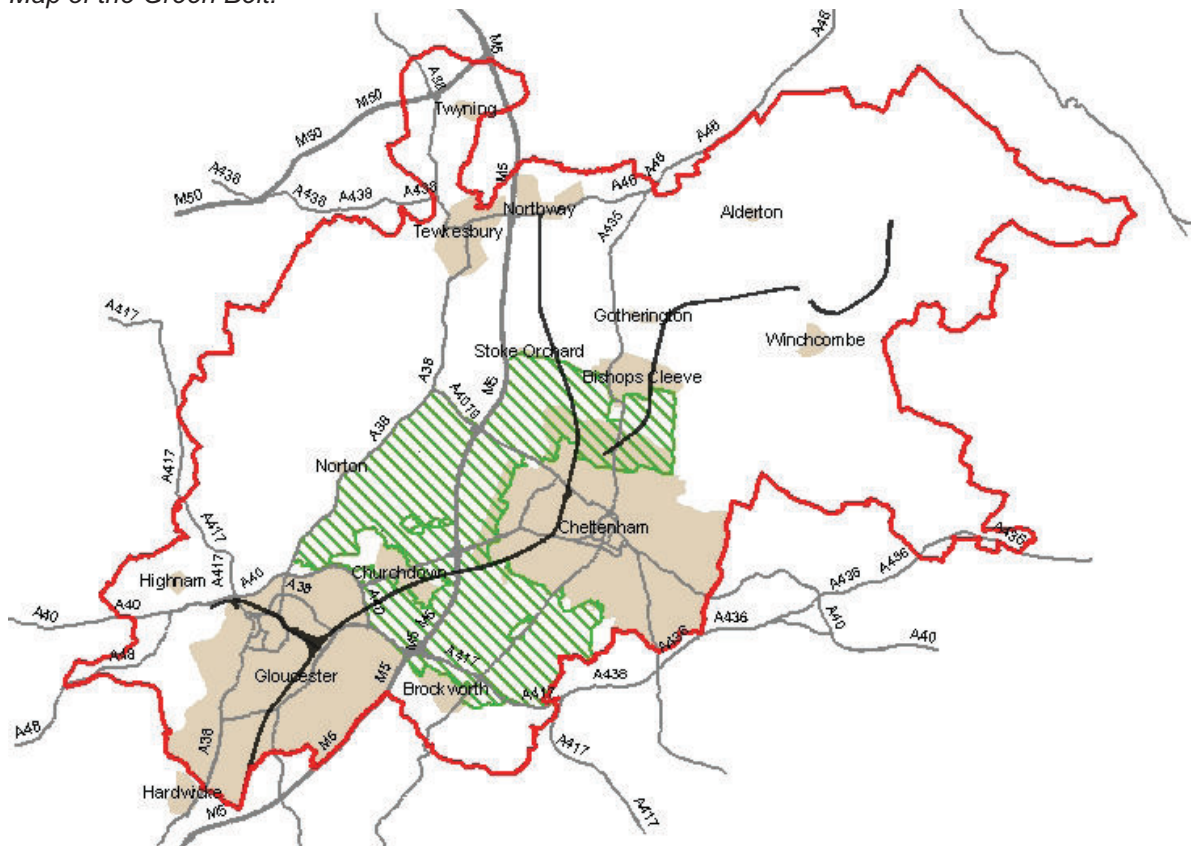
- Protect the AONB, Green Belt, woodlands, productive agricultural land, playing fields, allotments, disused railways, parks and open spaces, etc – promote biodiversity, provide a mix of formal and informal open spaces
- Green Infrastructure approach was endorsed: connecting and managing all green spaces for free access and multi-functional use by all
- Support provision/expansion of allotments, community orchards, community composting – link to local food schemes
- Concern that 'green spaces' provided by developers are inadequate/token gestures on undevelopable land. Green spaces must be usable
- Existing communities on the urban-fringe must not lose access to the countryside once urban extensions are built
- Maintain footpaths / rights of way and provide better cycle tracks (separate from the highway) to link villages/green spaces
- Concern over location of gypsy / traveller sites
- Support for farmers as "guardians of countryside"
- Support for provision of green burial sites

APPENDIX H – CONSTRAINTS MAPS

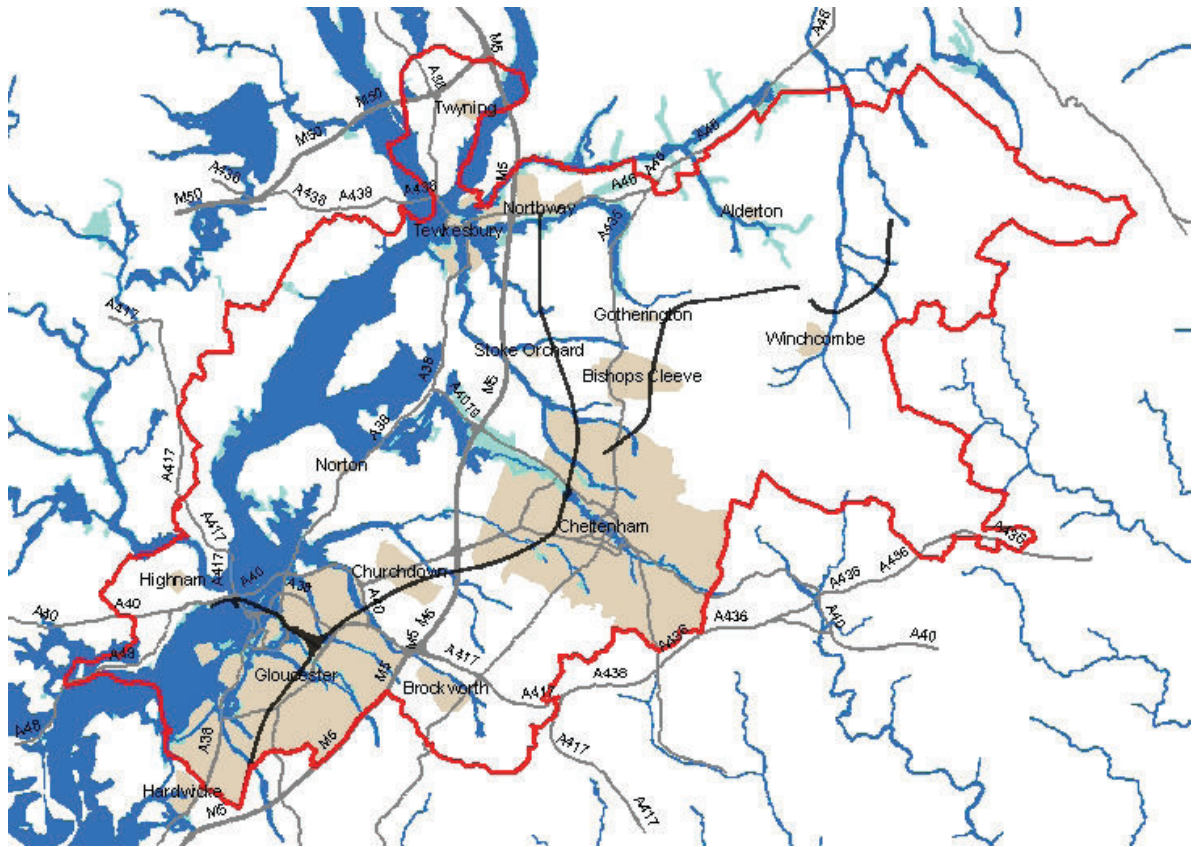
Map of the Cotswold Area of Outstanding Natural Beauty:



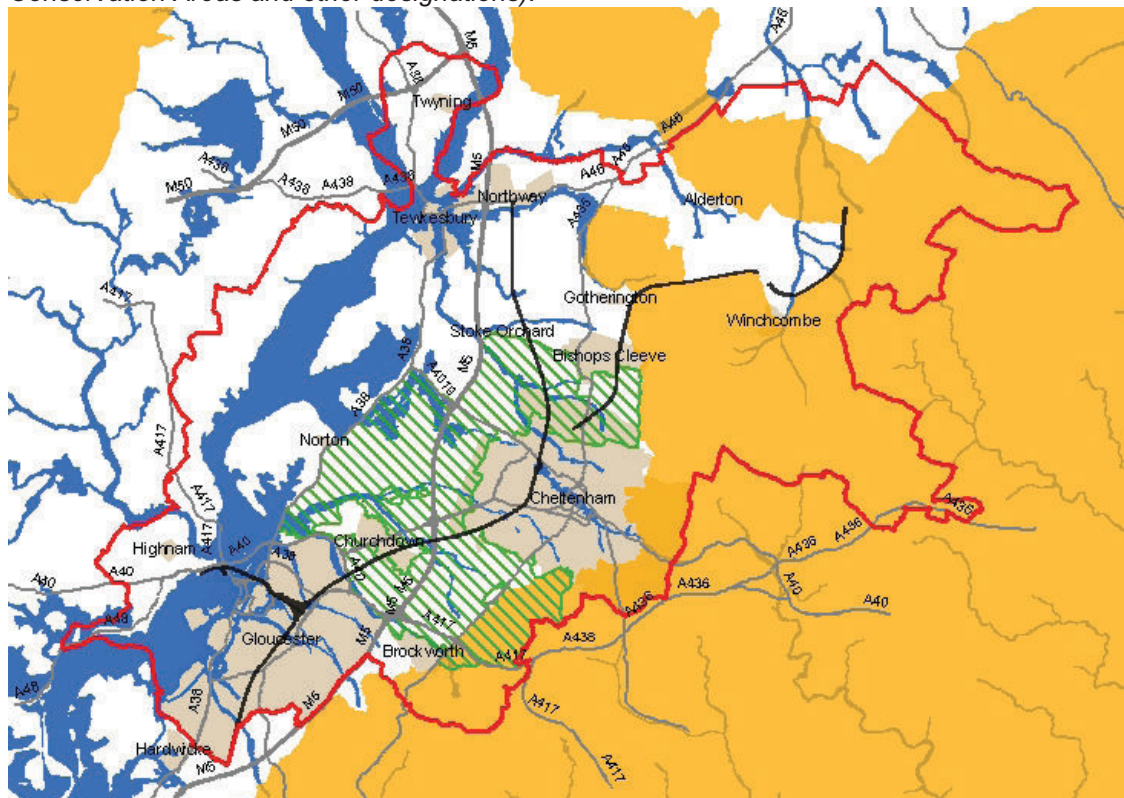
Map of the Green Belt:



Map of the Flood Zones:



Map of AONB, Green Belt and Flood Zones combined to reveal major development constraints (NB: other constraints exist area-wide and on a site-by-site basis, e.g. Conservation Areas and other designations):



APPENDIX I – STRATEGIC OBJECTIVES

4.12. In order to achieve the Vision the Joint Core Strategy will need to set objectives that will guide the future development of the area.

4.13. These are set out below as Strategic Objectives:

1. To mitigate contributions to the causes climate change and ensure effective adaptations are developed to improve the resilience of the Joint Core Strategy area to the impacts of climate change.
2. To reduce the risk of flooding and its impact, particularly by reducing the likelihood of communities and key infrastructure becoming inaccessible during flood events.
3. If the Regional Spatial Strategy for the South West is published it will be necessary to meet its requirements in the provision of new homes that meet the variety of housing needs across the Joint Core Strategy area and, in particular, ensuring that the provision of new homes facilitates the attraction and retention of skilled people to ensure economic growth.
4. To protect, manage and enhance biodiversity, the natural environment and formal/informal recreation through the development of a Green Infrastructure Strategy and the potential idea of a Regional Park. In particular, to increase the value and accessibility of the Joint Core Strategy area's environment for the benefit of the natural environment and the improved health and well being of the Joint Core Strategy area's population.
5. To build on the current high levels of self-reliance in respect of employment within the Joint Core Strategy area by encouraging employment sectors that are already strong within the area and attracting additional sectors that will help retain and attract skilled workers.
6. To develop the skills of people of all ages to match the future employment opportunities within the Joint Core Strategy area and seek to retain a higher proportion graduates.
7. To effectively encourage regeneration that makes the best use of the Gloucester Heritage Urban Regeneration Company and Cheltenham's Civic Pride sites and the medieval heritage of Tewkesbury.
8. To facilitate access to and improve healthcare and community facilities.
9. To deliver effective solutions for transport, planning and urban design to reduce the dependency upon the private car and improve the links between settlements so they can complement one another.
10. To realise regeneration aspirations and to establish the Joint Core Strategy area as a single attraction that caters for a diverse range of retail, cultural, educational, leisure and tourism needs by capitalising on the unique strengths of each settlement.
11. To ensure that development protects, preserves and enhances the important historic environment and the distinctive townscape qualities of the Joint Core Strategy area, including protection of key views and accessibility of historic locations throughout the Joint Core Strategy area.
12. To maintain and build upon the existing tourism economy of the Joint Core Strategy area by improving accessibility to existing attractions, encouraging the development of new attractions in accessible locations and by providing services to facilitate growth in the tourism industry.
13. To promote self-reliant communities by maintaining, enhancing and developing local and district shopping centres that provide for the day-to-day shopping and community service needs of the local population and promoting appropriate development that supports their function.

APPENDIX J – PART 1 ONLINE QUESTIONNAIRE

1. Do you agree with the Spatial Portrait?

Yes

No

Other

1b. Do you feel there are any areas/data sources missing?

Yes

No

Other

2. Are the Key Issues the right ones for the Joint Core Strategy to tackle?

Yes

No

Other

2b. Do you think there are any issues missing? If so, please indicate an evidence source to support the issue.

Yes

No

Other

3. Do you agree with the Vision for the Joint Core Strategy area?

Yes

No

Other

3b. Are there any areas missing?

Yes

No

Other

4. Do you consider that these are the right Strategic Objectives for the Joint Core Strategy?

Yes

No

Other

4b. Do you feel that there are any issues that have not been adequately addressed?

Yes

No

Other

5. General Comments

APPENDIX K – SPATIAL PORTRAIT (PART 1 CONSULTATION)

The Joint Core Strategy area lies within the county of Gloucester in the south west region, at the foothills of the Cotswold Hills with the M5 corridor to the west, stretching east to the Severn Vale. The area is dominated by Gloucester city and Cheltenham town, as well as being influenced by the market town of Tewkesbury. The three main settlements compliment with each other as centres for housing, employment and culture, retail, entertainment and tourism activities, while supporting the needs of smaller towns and rural villages. Although these urban centres are the focus for services and facilities they have areas in need of regeneration, which is being targeted through schemes and initiatives such as Gloucester Heritage Urban Regeneration Company, Civic Pride and Tewkesbury Masterplan.

Surrounding the urban areas is the wider rural area of Tewkesbury; a focus for agriculture and tourism, with services and facilities provided by vibrant market towns. The rural settlements look to the market towns, Gloucester and Cheltenham for employment, shopping and leisure, but also look beyond the Joint Core Strategy area, in particular looking north to Evesham.

The area is home to 311,900 residents, with Gloucester City projected to remain the area with the highest population up to 2026. However, due to anticipated development, Tewkesbury Borough is projected to experience the largest population increase of 31%^[1], with Cheltenham Borough experiencing very little population growth.

Tewkesbury Borough is the only district within Gloucestershire predicted to experience an increase in the number of children and young people between 2007 and 2026. The Joint Core Strategy area will see a significant increase in the number of older people. This is particularly pertinent given that only Gloucester and Tewkesbury Borough will also see an increase in working age population.

The area contains many important historical assets, including the rich array of below and above ground remains in Gloucester with the Cathedral and Docks standing out, the famous Georgian architecture of Cheltenham and its spa origins and the more vernacular variety of Tewkesbury with its medieval abbey and its association with the infamous battlefield.

These historic areas are set within a rural landscape, which includes the Cotswold Area of Outstanding Natural Beauty, several SSSI sites and numerous nature and landscape conservation areas. Outside the built areas there are areas of woodland and good quality agricultural land. Flood zones along the River Severn and its tributaries influence much of the sub region and long term planning will need to consider the effects of climate change, particularly following the significant floods in July 2007 which segregated communities and infrastructure.

There is a considerable identified need for homes across the whole Joint Core Strategy area, particularly affordable homes. The attractiveness of the area has influenced house prices and although there is significant variation in house prices across the area, they are approximately 8 times the average salary. Although the population is slowly increasing, the number of households is increasing at a faster rate. The number of one person households is expected to increase over the next couple of decades to exceed the number of married couple households across the County. Detailed analysis reveals that by 2026 about half of all one-person households will comprise a lone-pensioner.

There are differences in earnings, skills and qualifications across the area and there are pockets of significant deprivation within the urban areas. Employment opportunities are dominated by public administration, education and health, distribution, hotels and restaurants, banking, finance and insurance sectors and manufacturing. Provision on employment land remains an issue across the whole Joint Core Strategy area.

The area has 61% of the population at working age and the percentage of working population that is economically active is above national average. Long term unemployment figures are high for Cheltenham Borough and Gloucester City's educational attainment is significantly below national average. Income levels and levels of welfare dependency distribution indicate that the area has more affluent rural neighbourhoods. Despite this, urban neighbourhoods currently have better access to services with people living in rural neighbourhoods have to travel much further to reach key services. A significant minority of people in rural areas rely on public transport and many have no effective public transport access to a GP surgery with the majority relying on private car use.

The two main urban centres have areas that, according to the index of multiple deprivation, are within the top 10% most deprived areas nationally. In Gloucester these areas are affected by income; employment; health and disability; education skills and training; barriers to housing and services; crime and disorder; living environment. In Cheltenham these areas are affected by income; education skills and training; crime and disorder; living environment. Tewkesbury Borough has a number of areas that are affected by barriers to housing and services. Cheltenham has a higher number of victims of burglary, Gloucester has more victims of violence, while Tewkesbury Borough experiences less victims of crime. While benefit claims and lower crime levels show that socio-economic deprivation is not as prevalent in rural neighbourhoods as in urban areas the problems of accessibility adds another dimension to the deprivation across rural neighbourhoods.

The area is well served with rail, motorway and strategic road connections, acting as a gateway to the Forest of Dean, South Wales and the South West. The Gloucestershire Airport provides unique and increasing services to the area. The majority of residents travel within the area for work and services, as well as to areas such as Bristol, Worcester or Evesham. The vast majority of commuters use private cars (66%), with little reliance on public transport, walking or cycling. The major urban centres are compact and have potential for improvements to public realm and pedestrian linkages. The area is congested and suffers from the associated negative impacts this has on the economy, local air quality, climate change, quality of life and health. Consideration needs to be given to the strategic road network including the M5, which can be used as a ring road to bypass the congested urban areas.

[1] Gloucestershire Story 2009. Produced by the Research Team Chief Executive Support Unit, Gloucestershire County Council 2009.

APPENDIX L –KEY ISSUES (PART 1 CONSULTATION)

The characteristics outlined in the spatial portrait, the evidence base and community engagement work have identified issues that need to be addressed in the Joint Core Strategy.

A. Risk of lack of self-reliance and complementarity between settlements

Larger urban areas of Gloucester, Cheltenham and Tewkesbury, together with Winchcombe and Bishops Cleeve, offer a wide range of services, facilities and opportunities, while more rural communities can feel isolated with few or no services on hand. By developing complimentary relationships settlements can work together to serve the community, become more self-reliant and reduce the need to travel. There is a need for the area to be more competitive together.

B. Regeneration of urban areas

The urban centres have areas in need of regeneration and revitalisation. These areas contribute to loss of economic activity, businesses relocating outside the area and reduced retail activity. Urban centres need to be regenerated to increase the area's attractiveness to investors, visitors and residents, to bring centres back into use and to make the area robust and competitive for today's economy and that of the future. Developed needs to compliment the historic environment, where new and old need to work together.

C. Declining retail offer

Urban centres and rural areas are seeing the closure of retail outlets. The area also loses custom to larger centres such as Bristol, Cardiff, Birmingham and Swindon, which are all easily accessible alternatives. Cheltenham in particular has experienced a reduction in its national appeal to retail customers.

D. Increasing demand for housing and particularly affordable housing

A key challenge facing the area is to provide the level of housing required within the existing urban areas. The area faces a variety of housing needs and in particular affordable housing, lifetime homes, accommodation for the elderly and all age groups, gypsy and traveller accommodation, family homes as well as an increasing numbers of single households. The Joint Core Strategy must set out a long-term strategy for accommodating the housing, together with employment, retail and leisure requirements, together with the infrastructure required to support this growth.

E. Low skills and poor education attainment

There are disparities in education attainment across the Joint Core Strategy area, with Gloucester having far fewer residents achieving NVQ Level 4 and above. However, residents within Tewkesbury Borough and Gloucester achieve higher GCSE results than those in Cheltenham. The opportunity for education and skills training needs to be accessible for all residents with the Joint Core Strategy area. The need for re-training opportunities may become greater with changing economies and business opportunities. The area must readdress the current loss of school, college and university leavers to attract business and commerce with a strong local workforce.

F. Job provision, lack of employment and economy

Gloucester city has a lower level of business stock than the rest of the area. A key challenge facing the Joint Core Strategy is to ensure that employment land and jobs are delivered to enhance the economy in sustainable locations to minimise the need to travel. This is particularly pertinent in urban areas where the availability of land is low. The Core Strategy faces challenges in delivering these requirements with an aging population, enhancing the need to attract and retain skilled working age people to this beautiful part of the south west region. The economy across the area, and particularly the rural area, suffers from a lack of infrastructure and high speed broadband, particularly in the rural areas. The area currently accommodates industrial businesses which are important to the economy, it is vital these are retained and their needs supported.

G. Deprivation

The whole JCS area supports an increasing number of households claiming housing benefit with Gloucester having the highest amount of areas within the top 10% most deprived nationally. Residents within Gloucester and Cheltenham are more likely to face fuel poverty than those living in Tewkesbury Borough. These figures reflect the more affluent nature of rural locations. However, those living in rural areas face difficulties accessing services and facilities. The data highlights the areas' distribution of pockets of deprivation within otherwise affluent areas. It is important to address the levels of crime and the fear of crime across the area, and particularly in the urban areas, together is an adequate supply of community infrastructure.

H. Poor access to services and health care

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The rural nature of the JCS area means that many residents have to travel to reach services, with some areas suffering from inaccessibility. Access to public transport across the area increases dependency on private car usage and is an issue that needs to be addressed through the Joint Core Strategy. Evidence indicates that at a local level the number of residents dying early as a result of key illnesses is notably higher in Gloucester. The Joint Core Strategy can play a key role in promoting healthy lifestyles and exercise through the provision of open space, green infrastructure and sports facilities, as well as creating green linkages fostering health improvements through walking and cycling.

I. Public transport and congestion

Use of the private car is high and the area suffers from congestion and poor air quality. Communities across the Joint Core Strategy area have to travel for services. There is a need to reduce travel, creating balanced communities with an adequate provision of facilities. There is a need to reduce and manage car use and promote and encourage more sustainable means of travel, such as walking, cycling, public transport, with appropriate, accessible and sustainable transport provision.

J. Flood risk

The River Severn and River Avon, their tributaries and surface water and water movement have an impact on the area. Gloucestershire has been adversely affected by flood events in the past; residents and infrastructure are in need of protection from the segregation caused by such events.

K. Risk to natural environmental assets

Included within the area are internationally and nationally important habitats, Sites of Special Scientific Interest, the Cotswold Area of Outstanding Natural Beauty, areas of landscape and biodiversity importance and locally important wildlife sites. Also within the Joint Core Strategy area are Special Areas of Conservation, including the Severn Estuary SAC, SPA and Ramsar site. Most habitats and species are subject to ongoing pressures and are in need of protection and enhancement. Additional and improved greenspace is needed within urban areas and on the urban fringes. There is a need to enhance the protection of areas and species through maintaining openness, preventing isolation and areas becoming cut-off. The openness of the views to and from the Cotswold escarpment, Robinswood Hill and Cleeve Hill are important. The agricultural land across the area is important for rural economy, food production, tourism and recreation.

L. Climate change

Greenhouse gasses are contributing to climate change, which will affect the weather and flood events in the future. Residents in the area are high users of the private car, there are few renewable energy installations, and many rural residents have to travel for services, all of which contribute to greenhouse gas emissions. Development can contribute to climate change and the use of energy, as well as increasing waste. Evidence highlights that the amount of waste produced across the area is a key issue. The Joint Core Strategy has a key role to play in promoting sustainable design and construction, making better use of resources, minimising waste and carbon emissions.

M. Provision and protection of cultural, leisure and tourism offers

The area plays host to many important historic assets that are great tourist attractions, including the Gloucester docks and cathedral, Cheltenham's regency architecture and grandeur, Tewkesbury Abbey and Tudor buildings and picturesque market towns and villages, all set within attractive Cotswold and Severn Vale landscapes. The area needs to improve the opportunities that these assets present to reduce the 'gateway' effect and return the area to a 'destination' on the border of the South West, West Midlands and South Wales. A need for sufficient hotel provision has been highlighted through the evidence base, this will support the areas' numerous festivals and events.

N. Providing for inclusive communities

The Joint Core Strategy area is home to a wide range of communities from a variety of backgrounds. These communities have differing housing, cultural and living requirements. The Joint Core Strategy shall play a role in providing all residents with a safe place to life that provides equal opportunities, meets their requirements and enhances their community.

APPENDIX M – VISION (PART 1 CONSULTATION)

The vision has been informed by:

- Sustainable Community Strategies for Gloucester, Cheltenham and Tewkesbury
- Sustainability Appraisal
- The Spatial Portrait
- Consultation feedback

By 2026 the regenerated urban areas of Gloucester, Cheltenham and Tewkesbury town will be the key centres for services in the area, acting as sub-regional hubs supporting a network of rural settlements and increase the competitiveness of the area in the South West and West Midlands context. Within the conserved unique historic settings they will offer improved housing for all needs, employment, retail and leisure facilities, healthcare services and a variety of further and higher education opportunities. All settlements will be inclusive places with robust and safe communities, providing residents with an improved quality of life, health and well-being and reduced need to travel. The Joint Core Strategy will create strong and complementary communities that retain local distinctiveness through a co-ordinated planning strategy. Strengthening the roles of Tewkesbury, Bishops Cleeve and Winchcombe as local centres.

Sufficient sustainable housing will be delivered within and adjacent to the urban areas, as well as rural communities to meet the area's need and demand for homes, particularly affordable homes. The provision will be in the context of creating less carbon emissions, producing less waste, recycling more and is protected from flood events.

The area will support a dynamic range of employment opportunities with well balanced and diversified, higher value businesses and an adaptable and skilled workforce. Workplace and resident incomes will compare favourably with the regional average and educational development will be promoted which will bolster and support local resources and strengths. Economic stimulus and growth will be enhanced through improved transport and provision of high-speed broadband throughout the rural locations. Businesses will be attracted to the area by its protected and unique historic and natural environment and the high quality of life on offer.

Travel and congestion will be improved through initiatives that will see improved linkages between Gloucester rail station and the city centre, reduced through traffic in Cheltenham centre and a network of on and off road cycle facilities and walking routes through urban and rural areas. In rural areas opportunities for linked trips to settlements with a mix of services and facilities, market towns and larger urban areas will be maximised.

Development within Gloucester, Cheltenham and Tewkesbury Borough will be accommodated in ways to ensure that the environment is sufficiently robust to adapt to the wider impacts of climate change, including minimising pollution and ensuring availability of water resources. Residents and visitors will have access to a network of green infrastructure in an area that is community focused and well served by public transport. The area's natural beauty and quality landscape, biodiversity, built development and cultural heritage will be enhanced.

**APPENDIX N – DEVELOPING THE SPATIAL OPTIONS: STAKEHOLDERS
AND PARISH COUNCIL CONSULTATION**

**Joint Core Strategy – Developing the Spatial
Options Stakeholder Consultation (Chapter One
of Two)**

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Requested by: Joint Core Strategy authorities: Gloucester City Council, Cheltenham
Borough Council, & Tewkesbury Borough Council

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1.0 EXECUTIVE SUMMARY

1.1 Introduction

- Gloucester, Cheltenham and Tewkesbury Councils are working together to produce a Joint Core Strategy (JCS) – a key document in the Local Development Framework which sets out the long-term spatial vision for the area and will guide future development up to 2026.
- The JCS team commissioned Vision Twentyone, an independent research and consultation company, to work in partnership with them to facilitate five workshops with a range of stakeholders, with a view to acquiring feedback on the emerging strategic objectives and spatial options.
- Four workshops were delivered on 8th – 10th June, with one delivered by the JCS team alone on the 16th June 2010.
- The primary objective of the workshops was to establish an understanding of the views of stakeholders, gathering feedback on the draft strategic objectives and spatial options. The results of this consultation will provide a key input to the development of a preferred option for the emerging JCS for consultation at a future date.
- The strategic objectives presented to stakeholders were a second draft, the first draft having been consulted on as part of the Issues and Key Questions public consultation phase conducted during 2009-10.
- The spatial options presented to stakeholders were new work, developed in response to the Issues and Key Questions consultation, and before the Coalition Government had announced the abolition of Regional Spatial Strategies. Three spatial options were presented by the JCS team:
 - **‘A strategy focused on achieving resilience to climate change’ – known as the climate change option;**
 - **‘A strategy focused on achieving economic resilience’ – known as the economic option;** and
 - **‘A strategy focused on achieving stronger communities’ – known as the social option.**
- By testing extremes based on the “three pillars of sustainability”, the strengths and weaknesses of each option were highlighted, such that we may understand whether one approach should dominate the JCS team’s approach, or whether to balance the three options in pursuit of sustainable development.

1.2 Methodology

- The workshops were attended by key stakeholders (96 participants), members of the Local Strategic Partnership (LSP) (30 participants) and finally, Local Authority Members (25 participants) from across the three areas.
- The workshops consisted of presentations (from the JCS team, Vision Twentyone and guest speakers), small group deliberative activities, individual thought tasks and plenary sessions. Participants' input was captured on paper as part of these exercises and via electronic voting.

1.3 Key Findings

- Participants broadly agreed with the draft **strategic objectives** set to form the basis of the JCS, with 96% of Members in agreement, together with 83% of stakeholders and the LSP.
- However, approximately 80% of respondents felt the objectives, while broadly acceptable, could be strengthened. The main issue raised for further attention related to housing, specifically the need to provide affordable housing in both rural and urban areas. Other issues that respondents wished to see adequately covered in the strategic objectives include: education and skills; flooding; the role of the Green Belt; regeneration, public transport and the community.
- The second part of the consultation focused on spatial planning and the three **spatial options** listed above. The main issues participants wished to see addressed in spatial planning were: the provision of affordable housing; public transport improvements; planning for flood prevention without compromising economic development; the need to protect local food production and farming; improving the skills base of the workforce in all areas of the JCS; striking an urban/rural balance for development; reassessing the role of the Green Belt; and delivering a cohesive community.
- Suggested detailed improvements to the spatial options included: the provision of broadband in rural areas to encourage home working and therefore decrease travelling. Several participants stressed that the JCS must cater for all age groups.
- Each of the three spatial options were presented in turn and participants asked if they agreed that the option could coordinate development at a strategic level for the benefit of the area:
- **The climate change option:** the majority of participants agreed that this option could benefit the area, with Members showing the strongest support (87% 'strongly' or 'partly' agreed).
- **The economic option:** the strongest support for this option was again shown by Members (79% 'strongly' or 'partly' agreed); however, 40% of the LSP either 'strongly' or 'partly' disagreed with this option as a means to strategically coordinate development for the benefit of the area.
- **The social option:** the majority of participants agreed that this option could benefit the development of the area. Interestingly, 56% of the LSP either 'strongly' or 'partly'

agreed with this option; while, 28% of the LSP disagreed with it, suggesting the social option divides opinion.

- To summarise, when considering each spatial option individually, participants supported the principles of each approach (an average of 65%-67% of the whole participant group either 'strongly' or 'partly' agreeing that the issues discussed under each spatial option could help guide development for the benefit of the JCS area). Participants were then asked to consider the options together. They were asked whether the Joint Core Strategy should deliver a balanced approach combining all three options, or whether one of the three options should be dominant when seeking to guide strategic development across the JCS area. An equal, balanced approach was voted the most popular (attracting 42% of the vote) suggesting that moving forward, the JCS must seek to balance the three pillars of sustainability. In line with current concern over the challenging economic environment, the economic-led approach came second (28%), followed by the community-led (19%) and climate change-led approaches (11%).

2.0 INTRODUCTION

2.1 The Local Development Framework and Core Strategy

Following the introduction of the Planning and Compulsory Purchase Act 2004, Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council are in the process of developing policies for the Local Development Framework (LDF).

As part of the LDF process each council must prepare a Core Strategy - a document that will set out the long-term spatial vision for the area, together with the strategic policies and proposals set to deliver that vision.

Recognising the links between each area and the need for a coordinated approach, Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council are working in partnership to develop a Joint Core Strategy (JCS) – the main Development Plan Document (DPD) that will provide a long-term spatial vision for the area and guide how the three authority areas develop up to 2026 .

Essentially, the JCS will set out the councils' approach to dealing with climate change, protecting and enhancing the natural and historic environment, and establishing the location and timing of new housing and employment, key infrastructure, community, leisure and tourism facilities.

As part of the second stage of consultation - Developing the Spatial Options - this report sets out the approach taken and details the outcomes of a series of stakeholder workshops, focusing on the draft strategic objectives and spatial options for development. The feedback received will be used to inform the production of a preferred option, which will form the basis of the JCS.

2.2 The value of stakeholder engagement in the LDF process

A key driver in the LDF process is the involvement of local people in the development and planning system. It is acknowledged that a front-loaded, effective and participatory consultation programme for the JCS will lead to improved policies and proposals, and greater community ownership of the resultant document.

Based on a number of key principles as set out in 4.20 of PPS 12, involvement in the preparation of Core Strategies should be:

- **Appropriate** to the level of planning
- **From the outset** – leading to a sense of ownership of local policy decisions
- **Continuous** – part of an ongoing programme, not a one off event, with clearly articulated opportunities for continuing involvement.
- **Transparent and accessible** – using methods appropriate to the communities concerned; and
- **Planned** – as an integral part of the process of making plans.

The overall consultation programme for the Core Strategy must also adhere to the principles of consultation as set out in the Statements of Community Involvement (SCI) for each three JCS authorities, and with the JCS Consultation Statement of July 2009².

To support this stage of the consultation process, the JCS team commissioned Vision Twentyone, an independent research and consultation company, to plan, coordinate and

facilitate a series of workshops with stakeholders from across the area. Adopting a bottom-up approach, the workshops form part of the preproduction stage of the JCS, involving initial evidence gathering and providing an opportunity to involve those who may be affected by the outcomes of the document in the formulation of the plan. There will be further opportunities for involvement in the production of the JCS in future.

2.3 New Coalition Government – New rules

The Government's abolition of Regional Spatial Strategies (RSS) (confirmed by Secretary of State (SoS) Eric Pickles on 6th July 2010) reinforces the increasing importance attached to the development and application of local spatial plans, in the form of Local Development Framework Core Strategies and Development Plan Documents (DPDs).

The Government believes that it is time for a fundamental shift of power from Westminster to the people, ending an era of top-down government, giving new powers to local councils, stakeholders and their communities to inform DPDs from the bottom up. Drawn up in collaboration with the community, local plans will form the basis of future planning decisions, providing a guide for the overall direction of future development across an area.

Abolition of the RSS removes regional development targets set by national government. However, it does not remove the need to plan for future growth – local housing, employment, environment and community infrastructure needs have not disappeared, but can now be locally determined. The JCS provides a good basis to determine and meet future development needs across the area. Completing the JCS means that any future development will be coordinated, plan-led and evidence based.

At the time this report was published, the JCS team is reviewing its timetable in light of these changes to national policy. Announcements will be made on the JCS website: www.gct-jcs.org.

2.4 Developing the JCS

The JCS is currently expected to be divided into two parts. Part One will include:

- A 'Spatial Portrait' of the JCS area, providing a clear sense of place
- A summary of the key issues faced by the area
- A clear vision for how the JCS area could be in 2026
- Strategic objectives that must be fulfilled to achieve the vision.

Part Two will consist of spatial plans and policies designed to achieve the vision and strategic objectives described in Part One. Work to prepare both parts is in line with the statutory requirements described above and can be summarised as follows:

The JCS 'Issues and Key Questions' consultation document was published for a ten week period of public consultation between 23rd November 2009 and 1st February 2010. This document included a first draft of the four elements of Part One. Representations received during the consultation informed the preparation of a second draft for further consultation with stakeholders and the public; the representations also informed the development of spatial options presented to stakeholders and Parish Councils. All consultations are reported here in Chapters 1, 2 and 3.

The **key issues** presented to participants in this consultation were:

- Self-reliance and relationships between settlements
- The need for urban regeneration

- Declining retail offer
- Increasing demand for housing and particularly affordable housing
- Low skills and poor education attainment
- Job provision, employment and economy
- Deprivation, access to services and healthcare
- Public transport and congestion
- Flood risk
- Natural environment and climate change
- Cultural, leisure, tourism offers and inclusive communities.

The draft **strategic objectives** presented to participants in this consultation were defined as:

- 1) To deliver successful regeneration
- 2) To deliver jobs and a competitive economy
- 3) To deliver new homes to meet the need and demands of a competitive sub region
- 4) To deliver quality skills and education
- 5) Creating access to services and healthcare
- 6) Improve transport and movement
- 7) To reduce the risk and impact of flooding
- 8) Improving and securing an enhanced natural environment
- 9) Improving the resilience to climate change
- 10) Improving culture, leisure and tourism activities.

Three spatial options for development were designed to help explore methods by which the strategic objectives can be fulfilled. These were presented in this consultation and can be summarised as follows:

- **‘A strategy focused on achieving resilience to climate change’ – known as the climate change option**
- **‘A strategy focused on achieving economic resilience’ – known as the economic option.**
- **‘A strategy focused on achieving stronger communities’ – known as the social option**

The spatial options, and consultation responses to them, will be used to inform the development of a preferred option. The preferred option will form the basis of the emerging JCS and be subject to further consultation at a future date before submission to the Secretary of State.

2.5 Purpose of the consultation

Vision Twentyone identified the primary objective of the workshops to be to establish an understanding of the views of stakeholders, gathering feedback on the draft strategic objectives and spatial options, in order to support the overall vision and emerging JCS. In order to meet this objective, Vision Twentyone worked with the JCS team to:

- Organise and facilitate five stakeholder workshop sessions
Publicise the workshops to stakeholders by way of an invite email, reminder email and telephone call
- Design and facilitate the workshops to ensure that they aid understanding, using appropriate interactive techniques, and thus prompting an enthusiastic response
- Prepare this report for the JCS team, which records the views of stakeholders and can be used as part of the robust evidence base to

support the JCS as it moves forward.

The results of this consultation will provide a key input for the development of the strategic objectives and spatial options that will form the basis of the JCS. Public consultation on that work will be announced in due course on the JCS website: www.gct-jcs.org.

2.6 Supporting consultation

As part of this second stage of consultation, the JCS team presented the strategic objectives and spatial options from the stakeholder events to the following Parish Councils between 14th June and 26th July:

Cheltenham area

- Elmstone Hardwicke
- Leckhampton and Warden Hill
- Shurdington
- Swindon Village
- Uckington.

Gloucester area

- Brockworth
- Hucclecote
- Innsworth
- Longford
- Quedgeley
- Twigworth.

Wider Tewkesbury area

- Bishops Cleeve
- Gotherington
- Woodmancote
- Winchcombe



These included all Parish Councils directly affected by areas identified for growth in the abolished RSS, and others who had expressed interest in engaging with this phase of consultation during the 'Issues and Key Questions' stage. Outcomes of these meetings with Parish Councils are included in Chapter of this report.

3.0 METHODOLOGY

3.1 The workshop groups

Five workshops were held between 8th and 16th June with a wide range of key stakeholders, all of whom are important to the formulation of the JCS. These included statutory consultees such as the Environment Agency, plus local businesses, community groups, campaign groups and service providers.

One workshop was held specifically for members of the Local Strategic Partnership (LSP), bringing together representatives from local, statutory, voluntary, community and private sectors.

Finally, a workshop session was held with local authority members, including councillors from Gloucester, Cheltenham and Tewkesbury Councils.

3.2 Recruitment

Potential participants were identified in partnership with the JCS team. An invitation was sent via email encouraging them to take part in the consultation. The initial invite was then followed by a reminder email and telephone call, conducted in order to boost attendance.

The workshops were attended by key stakeholders (96 participants), members of the Local Strategic Partnership (LSP) (30 participants) and Local Authority Members (25 participants) from across the three areas.

3.3 Format of the workshops

Held in Cheltenham, each workshop followed a similar format and consisted of a series of presentations, small group deliberative activities, individual thought tasks and plenary sessions, some of which were tailored to the specific audience:

Introductory presentations were delivered by members of the JCS, guest speakers and Vision Twentyone. Small group activities focused the discussion initially on the strategic objectives; each spatial option was then discussed individually following a presentation aimed at providing more detail on the specific option. The latter provided an opportunity for participants to review the options in turn, highlighting what they felt was missing from each, providing the JCS team with the intelligence they need to begin to develop a preferred option. For example, building on their involvement at an earlier stage in the process the LSP took part in an additional task, focusing in more detail on the content of the strategic objectives.

Following each debate, digital voting technology was used at key points, providing participants with an opportunity to air their opinion on the strategic objectives as a whole, then each individual spatial option. Participants were then asked whether they felt that, in order to guide coordinated development across the JCS area at a strategic level, the Joint Core Strategy should focus on delivering a balanced approach combining all three options, or whether one particular element should be more dominant. An advantage of this method is that it produces instant feedback; charts are displayed in real time which conveys the results of the votes. This method was used to gather a group consensus on the strategic objectives and spatial options.

3.4 A process of continuous improvement

As with any event, it is important to adopt a flexible approach and ensure the process is under continuous review to make sure the activities meet the objectives of the consultation and the needs of the participants. As a result, the questions posed through

the digital vote were refined and minor changes were made to the format of the presentation over the course of the events. This improved the clarity of materials presented and the robustness of the results, without compromising the adopted methodology.

Overall, 129 of the 132 participants who completed the evaluation questionnaire felt the workshop was 'worthwhile' or 'very worthwhile'. All participants felt that the event helped them understand the issues and confirm/develop their thinking about the JCS.

3.5 Report structure

The analysis is split into two sections. The first part focuses on the strategic objectives and suggested improvements to them. The second part examines the three spatial options, indicating which (if any) should be given a higher priority in the development of the JCS and preferred option. Finally, the conclusions explore the overall findings of the events.

Please note: this report should be read in conjunction with Chapters 2 and 3 which present the findings of supporting consultation events conducted with Parish Councils and (online with) the general public.

In a 'text cloud', the more often a word is used, the larger its size; therefore the largest words show the most common issues. It is evident that the most popular words highlighted by all of the stakeholder groups were: 'need', 'housing', 'development', and 'community', with 'need' being the most frequent. The issue of 'need' related to the provision of housing, with particular reference to the delivery of affordable housing; the 'need to' locate housing near to employment to reduce travel, the identification of development sites and the 'need to' provide for an ageing population. Housing was a key area of debate, prominent throughout the discussions on both the strategic objectives and spatial options. Housing, or more specifically 'how' and 'where' to deliver it was the most popular area of debate for Members.

For the stakeholders no single topic was particularly dominant, as a range of issues were regularly discussed. The following issues were common to all groups and will be discussed in more detail throughout the report:

- The delivery of housing, especially affordable housing
- Delivering jobs in the area and up-skilling the local workforce to access high skilled jobs;
- The environment – specifically flooding and the role of the Green Belt Regeneration and specifically how and where it is delivered
- The provision of public transport
- Delivering a cohesive community.
- Other key issues include: regeneration, public transport, jobs and community. The main element missing from the strategic objectives highlighted by the LSP was 'community'.

4.1.1 Housing The need to deliver affordable housing is paramount. Participants emphasised a need for new housing targets to be devised, of particular importance following the recent abolition of the RSS and the need to ensure a rural/urban balance in delivery. As important, their design must be 'fit for purpose' or 'in keeping' with the surrounding area.

Participants suggested new houses should be located near employment opportunities. If this does not happen participants thought that it would be detrimental to the area. For example, it will increase the need to travel which will hamper plans to tackle climate change. In addition, if an increase in employment opportunities is encouraged without linking this to housing, problems related to a lack of provision could arise.

4.1.2 Jobs Linked to housing, it was seen as imperative that jobs are located in proximity to where people live. In addition, training and further education should be linked to future job provision in the area. Educational attainment was highlighted as an issue that needs addressing and young people need to be equipped with the right skills to acquire future jobs that will be provided in the JCS area.

"There needs to be apprenticeships with local businesses. A long-term turnaround is needed and this can be achieved through better education."

"Ensure skill-base locally is high enough to compete with travelling workers."

4.1.3 Environment The role of the Green Belt was a hot topic for all three groups with significant disagreement on certain issues. Some participants argued that the Green Belt should be redefined and reassessed, whereas others wanted it to be

protected at all costs. Developers found it frustrating that the Green Belt was viewed as sacrosanct and some of the LSP and Members shared this view. However, whilst dominant, this view was not universal.

Another key issue was flooding and, more specifically, the definition of 'flooding' and the validity of the Environment Agency data. Furthermore, some wanted the issue of climate change to be more ambitious, with one suggesting that: "I would like to see a more imaginative and radical approach to tackling climate change not just mitigating effects or coping with it".

4.1.4 Regeneration It was felt that regeneration should not focus solely on the urban areas, but should be more dispersed and include rural areas, smaller villages and any less affluent settlements across the JCS area. Furthermore, it was stressed that the strategic objectives should emphasise the need to encourage local distinctiveness through regeneration projects, reinforcing the individual identities of key areas.

"There needs to be regeneration in villages and this can be achieved through the delivery of affordable homes."

"You should regenerate areas that are currently deprived."

4.1.5 Public Transport

This was an important issue for several participants, with an emphasis placed on the need to provide better quality services throughout the JCS area. A common theme for the three groups, it is evident that participants do not think current provision of public transport services is adequate and as such does not serve the JCS area effectively. This needs addressing and should be a priority for the strategic objectives.

4.1.6 Community The issue of community was a key theme to emerge from the analysis and was of particular relevance to the LSP, who note that the strategic objectives lack an emphasis on the need to achieve a just/cohesive society. It was felt that whilst the JCS is a spatial plan, the need to develop stronger, mixed communities is key to the delivery of a successful JCS. This was also raised by stakeholders and Members, which implies that delivering successful communities needs to be prioritised in the strategic objectives.

"There is no commitment to a just society based on equality of opportunity irrespective of race, religion, age, disability, gender or sexual preference."

"There is no stated commitment to delivering a cohesive society where people understand that if we don't work together we shall fall apart."

4.1.7 Specific thoughts from the LSP Building on their previous involvement in the JCS, members of the LSP had a more detailed discussion on the strategic objectives than other groups, with each table focusing on five of the ten objectives. The support expressed for each objective during discussions is summarised in the table below:

Please note, not all respondents completed every question.

	Agree	Disagree	Partly Agree
1. To deliver successful regeneration	5	0	9
2. To deliver jobs and a competitive economy	5	0	9
3. To deliver new homes to meet the need and demands of a competitive sub-region	5	0	5
4. To deliver quality skills and education	0	0	5
5. Creating access to services and healthcare	5	0	5
6. Improve transport and movement	0	0	16
7. To reduce the risk and impact of flooding	5	0	11
8. Improving and securing an enhanced natural environment	11	0	5
9. Improving the resilience to climate change	6	0	10
10. Improving culture leisure and tourism activities	0	0	16

It is clear that whilst participants agree in part with the strategic objectives, they feel these can be strengthened if their comments are listened to. Interestingly, 16 people answered the questions relating to strategic objectives for transport and for culture/tourism, yet none fully agreed with them.

Connectivity was a key theme to emerge from the workshops and is reflected in the above table, as participants felt this objective could be improved to incorporate a greater emphasis on public transport and links between the settlements in the JCS area. By contrast, there was some debate into the validity of the culture/tourism strategic objective. No one actually disagreed with the strategic objective, however some questioned its relevance to planning and it was not seen to be as important as, for example, the need to deliver new homes or improve the natural environment.

Another important point is that 'enhancing the environment' was the only objective to score higher for 'agree' compared to 'partly agree'. This suggests that participants were content with this strategic objective.

4.1.8 In summary The strategic objectives have been analysed and it is clear that, despite strong support, there are some issues (such as delivering affordable housing and creating a cohesive society) that need to be further developed or inserted into the strategic objectives.

4.2 Spatial options

The JCS team presented three spatial options:

- **'A strategy focused on achieving resilience to climate change' – known as the climate change option;**
- **'A strategy focused on achieving economic resilience' – known as the economic option;** and
- **'A strategy focused on achieving stronger communities' – known as the social option.**

Group discussions on each spatial option are reported individually in this section, followed by analysis of digital voting in which participants had the opportunity to show their agreement with each spatial option, and note which one they felt should play a lead role in the JCS.

4.2.1 Climate change option

This option looks at how the JCS area can develop in a sustainable manner, with a view to enhancing the area's resilience to climate change. The large stars denote areas of opportunity, with pink rings highlighting the main settlements. Blue shading highlights flood zone areas, with green shading indicating the Green Belt and yellow, Areas of Outstanding Natural Beauty (AONB).

Key policies include a reduction in the need to use a private car and the need to divert development away from flood prone areas.

At the end of the presentation, prior to their small group discussions, participants were presented with the following conundrums or areas for discussion, the purpose of which was to ensure the JCS team gather feedback on the key areas they require:

- How can we achieve resilience to climate change without limiting housing and economic development through the JCS?
- The amount of land required to meet development needs is limited due to the Green Belt – how can the land required to meet the needs of the community be found whilst providing green and open space and Sustainable Urban Drainage Systems (SUDS)?
- Achieving 'zero carbon' development is expensive and could impact on the delivery of affordable housing and redevelopment of previously developed land
- Managed retreat from development of flood prone areas could reduce investment in these areas How can we encourage people to use local services when a greater range is available elsewhere by car?

Positively, the stakeholders thought that this option would create numerous community benefits and both the LSP and Members believed that this option illustrates a coordinated approach to address flooding related issues.

Negatively, some participants doubted its deliverability and one stakeholder criticised the approach for not "thinking outside of the box". The main issues to emanate from the discussions were:

- Flooding and the role of Sustainable Urban Drainage Systems (SUDS);
- Potentially negative impacts on the delivery of affordable housing;
- Improving public transport services throughout the JCS area;
- The importance of protecting local food supplies.

The following section discusses the above themes in more depth.

Flooding

After the floods of 2007, flooding is clearly an important issue for local residents. Sustainable Urban Drainage Systems (SUDS) are an important part of flood defences designed to reduce the impact of new and existing developments on surface water drainage discharges. When discussing this issue in reference to housing, there was a divide in participants' opinions. For example, some felt that SUDS were not effective in this area due to local soil conditions. The LSP and Members felt that implementing SUDS into new housing developments "should be seen as an opportunity not a constraint." A key issue for SUDS was their design – there was general agreement that appropriate SUDS should be planned into new developments from an early stage.

LSP participants thought that the climate change option could be improved by enhancing policies relating to flooding. In particular, they thought that policies could be inserted to ensure SUDS are designed into old developments as well as new.

The impact that SUDs could have on housing was also a concern. Members of all three groups noted that too much emphasis on SUDS could limit the number of new houses being built. Clearly this is a contentious issue as the participants are well aware of the need to mitigate against flooding. However, developing new housing was a key theme highlighted throughout the consultations and its policy should be prioritised

Housing

Eight out of 11 workshop table groups thought that if the JCS has too much focus on climate change, this may constrain the delivery of affordable housing and in turn, this could have a detrimental affect on economic development.

Similarly, caution was aired about the potential knock-on effects associated with the desire to achieve zero carbon developments, with 11 out of 15 workshop table groups noting that this could have a negative effect on the delivery of affordable housing. All three groups, in particular stakeholders, were worried about the cost of this approach and its potential impact on affordable housing. Investing more money to achieve resilience to climate change could result in "less investment in affordable housing."

Housing was a key issue for the stakeholders, LSP and Members. For the majority of participants it was deemed more important (in the short term) than the need to address climate change.

"Affordable housing is a bigger priority." (relative to zero carbon housing).

"We need more affordable housing in places where it is lacking. This should be the number one priority."

Public transport

The need to improve transport provision as part of a strategy focusing on climate change was emphasised. All groups suggested that improvements need to be made to public transport policies and that this spatial option should address this issue in more detail. Stakeholders were of the opinion that by improving public transport, more people will be encouraged to use local services and as a knock-on effect, decrease car usage across

the area. Participants noted that some rural settlements are isolated and the provision (and frequency) of public transport is not acceptable. Until this is addressed, people will still predominantly use the private car as their main mode of transport.

“Better public transport needs to be a more viable option than the car. We have to make transport better to suit people.”

“There needs to be greater investment in quality public transport it has to be a more viable option to the car.”

“Rural services must have adequate quality and good public transport.”

Local food

The LSP felt strongly about the production and protection of local foods and they felt that this was a key element lacking in the climate change option. This was supported by the stakeholder group. Some members of the LSP felt passionately about the need to protect and enhance the use of local food suppliers and it was a mistake that this was not mentioned as part of this option.

Agriculture is clearly a key issue in the JCS area and protecting local food is important for a range of participants.

“The JCS is too urban and it forgets farming.”

“There needs to be a greater emphasis on local food production/food security.”

Digital vote – climate change spatial option

It is evident from the chart below that the majority of the groups support the climate change option. Members showed the strongest support, with 87% either ‘strongly’ or ‘partly’ agreeing that the issues discussed under the ‘**climate change option**’ could help guide development for the benefit of the JCS area. Whilst key stakeholders generally agreed with the issues discussed under the climate change option, just under one third of them (28%), and a quarter of the LSP (24%), either ‘partly’ or ‘strongly’ disagreed, highlighting a greater range of opinion on this option than seen among Members.

A key message from stakeholders was the need to maintain a balanced approach and “not to become obsessed by one particular issue.” Public transport needs to be embedded into the climate change option. This should also be linked to the need to locate jobs near to housing. If this does not happen, one Member felt “people will come in via the M5 and the local economy won’t prosper.”

In summary

There is a broad acceptance of this spatial option. However, there was caution aired that if this strategy is the most dominant of the three spatial options in the JCS, this could result in a negative economic impact. Whilst participants agreed with the climate change option, it was not deemed as important as, for example, the provision of affordable housing, with one participant noting: “more important things need doing”.

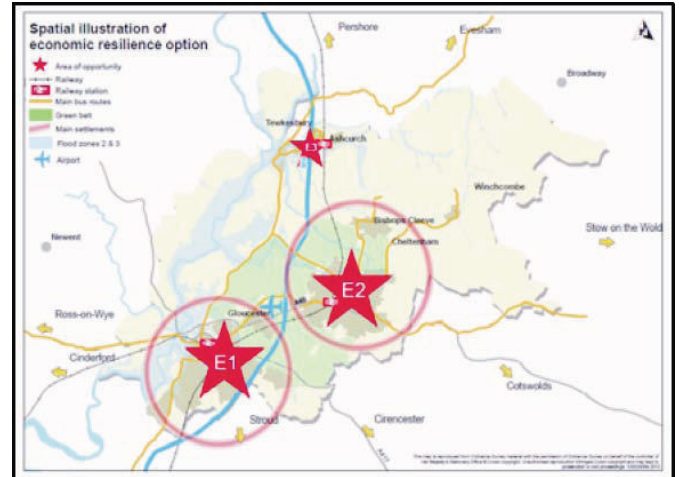
4.2.2 Economic option

This option aims to achieve economic resilience across the JCS area. It is an ‘urban-centric’ strategy, meaning that new development will be concentrated on the main urban areas such as Gloucester, Cheltenham and Tewkesbury / Ashchurch.

The stars highlighted on the map indicate areas of opportunity, with pink rings used to denote main settlements. Again the Green Belt is shaded in green, with flood zone areas represented by blue shading.

Prior to the group work session, the following conundrums were presented to participants and were used to focus their discussions on the economic option:

- Can mitigation work alleviate risk in flood prone areas that are the focus for development?
- Or should other development options be sought?
- How will focusing development to the west affect the economic resilience of the whole JCS area?
- Focusing development around the M5 may encourage commuting to other areas. How do we encourage people to stay in the area?
- If economic growth is pushed, should this be supported by an increase in housing?
- Does the capacity exist to provide the supporting infrastructure to deliver an urban centric strategy?



Participants noted one advantage of this approach is that it could drive regeneration and create funds for other projects. However, an over reliance on this approach could have a detrimental effect on rural communities, and flood risk in the urban areas would be a major restraint on such targeted development.

Key economic issues centred on:

- The importance of locating jobs in proximity to housing;
- Up-skilling the local workforce in all communities in the JCS area;
- Striking a balance between urban and rural areas;
- The role of the Green Belt;
- Infrastructure and public transport are stifling economic development.

Housing

The stakeholders cited a preference for good quality housing so that the JCS area has a: “...range of housing to meet all needs. There has been too much concentration on low-cost housing, also need good quality to attract all groups of people.”

Echoing the findings from the climate change option, all groups felt that housing should be located near to employment. This was a recurring theme. Additionally, there was a preference that unless there is “housing before jobs, it will create out commuting.” This is an issue that needs to be addressed or else it could have a negative affect on the local economy. Comments included:

“Employment and housing links are vital.”

“The provision of housing has to meet employment needs.”

“It is crucial that you account for a growing population and the increasing need for housing. There is a need for affordable homes and the delivery of housing has to service towns and villages.”

Education and skills

Participants said that an increase in jobs will need to be matched with an increase in skills of the local population. Crucially, these skills need to be tailored to jobs that will be created in the area. The JCS needs to outline what jobs are likely to be prominent in the future so schools and colleges can improve the skills of residents to ensure they can access these jobs. In addition, there needs to be a strategy to improve the skills of all communities living in the JCS area. People from deprived communities cannot be ignored and it is imperative that they have the opportunity to access better jobs that require higher skills. Comments to this effect included:

“Train where there will be jobs!”

“Ensure people in disadvantaged areas have the skills to compete for jobs.”

“[We] need an up-skilling of the workforce.”

Urban/rural balance

All three groups wanted a coordinated and balanced approach, noting that if development is focused on the ‘urban west’ of the JCS area, this would have a negative impact on the ‘rural east’, with the majority of the tables in agreement. Those remaining felt that in the long-term the whole area could benefit. Nevertheless, there was a strong feeling that the JCS should not neglect rural areas. This is an important issue as “rural communities are become increasingly unbalanced and unsustainable.”

A balanced approach was considered essential - participants felt that alone, the economic option may fail to deliver this. Caution was noted that if the economic option led the development of the JCS it could exacerbate the gap between urban and rural areas. Inter-relationships between urban and rural areas are required and it needs to be specified “how the growth of the urban core can support the county.”

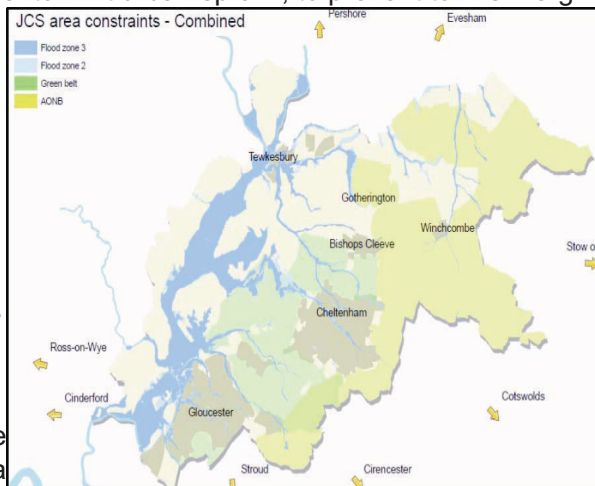
“There is a need to sustain rural settlements e.g. Winchcombe.”

“A mix is needed. You should not place 'all eggs in one basket'. Do not focus on the urban at expense of rural.”

“Need to avoid over focus on the two major urban centres.”

Green Belt

The original goals of the Green Belt were: to limit urban sprawl; to prevent towns merging into one another; to safeguard the countryside from encroachment; to preserve the setting of historic towns; and to assist in urban regeneration by encouraging the recycling of derelict and other urban land (PPG2). The Green Belt within the JCS area has had mixed success in achieving these aims. It is a valued local resource that attracts strong feelings and significant controversy.



A range of participants from all three groups felt that the Green Belt was a constraint on economic development in the JCS area: “if it weren’t for the Green Belt, which is where we would put sustainable, mixed-use development.”

The role of the Green Belt was a major aspect of debate and many participants felt that it was hindering housing development and economic growth in the JCS area. However, it should be noted that many other participants believed that the Green Belt should not be altered. Despite differences in opinion, there was a consensus that the Green Belt could be improved.

“The Green Belt should be reassessed.”

“We are constrained by the Green Belt to develop the urban areas.”

“The Green Belt should be made greener and more accessible. Enhance it and use it.”

Public Transport

Stakeholders identified a lack of provision for infrastructure and transport as major barriers to delivering economic development – a point supported by the LSP and Members. Only 2 out of 12 workshop table groups thought that there was enough provision for infrastructure in the JCS area to support an urban-centric approach. Stakeholders, LSP and Members were unified in thinking that current transport provision, and in particular public transport, is not acceptable and this needs to be addressed through the JCS. One Member stated that “transport links are not good enough.” Public transport needs to be improved because:

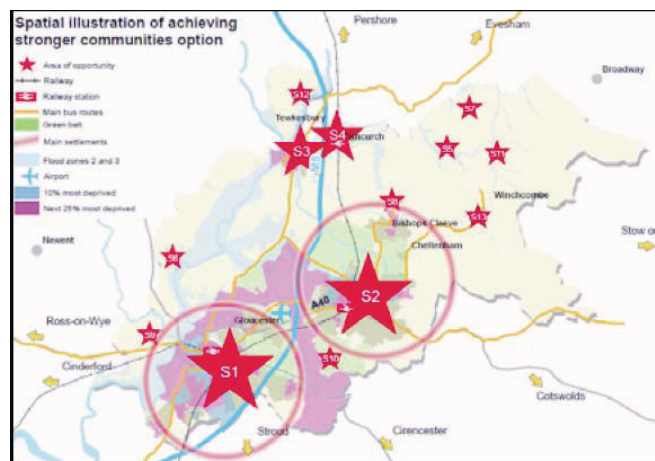
“The job prospects of residents living in high density affordable housing aren't good and it's a long way to travel to places to work. We are in danger of creating a more deprived area.”

Furthermore, some of the Members felt that this option could make a positive contribution to the need to tackle climate change, noting “we don’t want people becoming more car dependant so we need to focus jobs in urban areas.” This option delivers this, which was favourable amongst a lot of participants.

Digital vote – economic spatial option

Again, broad support was shown for this option. Members were the group showing strongest support: 79% either ‘strongly’ or ‘partly’ agreeing with it. Among stakeholders and the LSP, there was general support but a greater range of opinion than seen among Members: 60% of stakeholders either ‘strongly agree’ or ‘partly agree’ with the economic option, but 30% either ‘partly’ or ‘strongly’ disagree.

Among the LSP these figures are 56% (positive opinion) and 40% (negative opinion). The key issues to emerge from this option were the need to assess the role of the Green Belt and provide additional infrastructure, in the right places, to support new housing development. Positively, this option “addresses our biggest issue at the moment” (the economy) and according to one member of the LSP: “Everything has to be paid for and this is the only option that will do this.”



In summary

Crucially, the economy is the “immediate issue affecting people’s lives” and this urban-centric approach was viewed as most likely to improve the economy. Furthermore, this option could bring wider benefits as “economic success will drive other aspects of the JCS through.” Participants were aware that the recession could have an impact on the JCS and one noted that:

“In the current economic climate there is a need to focus on the economy – ignore it at your peril.”

Nevertheless, it is “unacceptable to deny the rural centres opportunity for enhancement” and this was the main concern for this spatial option.

4.2.3 Social option

The social option focuses on delivering stronger communities through the provision of housing and jobs in accessible locations across the JCS area – and particularly in the more deprived areas.

Again, looking at the visual representation of the spatial option, the stars denote areas of opportunity, pink circles highlight main settlements, green shading indicates Green Belt and dark blue shading, flood zone areas. In addition, light blue indicates areas within the most 10% deprived (Indices of Multiple Deprivation) and pink, the next 25% most deprived.

To inform the deliberations the following conundrums were presented to participants,

aimed at providing a focus to the small group discussions:

- How can the policies contained within the JCS ensure mixed/ balanced communities across the area when some locations have no, or limited, existing development opportunities?
- How can employment opportunities be provided where opportunities for development are limited?
- Would the removal of the threshold for affordable housing provision stifle small scale developments on previously developed land?
- The social option focuses development on rural settlements which have three or more key services; is this a reasonable approach?
- How can the most appropriate community facilities for new developments be identified?

The main advantage of this option, noted by stakeholders, is that development will be dispersed across the region and is inclusive. Moreover, the LSP liked the option because it will help deliver strong and mixed communities. However, there were concerns about how this option could be delivered in a time of public spending cuts and an uncertain economic climate. The main issues arising are:

- The need for mixed communities that cater for all age groups;
- Delivering affordable housing throughout the JCS area;
- The isolation of rural areas – can selected settlements act as service hubs for the benefit of others, and if so, which ones?

Community

The need for mixed communities - of all social backgrounds and demographics - was viewed as crucial. It was stressed that the JCS team need to bear in mind that there is an ageing population residing across the JCS area, whilst also catering for the needs of young people. In addition, the changing demographic profile of the area may also have an effect on housing need and associated infrastructure/service provision. This is important for housing, but also for the community. There need to be facilities for young and old people. However, it was felt that there is more to a community than simply facilities and the JCS needs to focus on how community spirit can be fostered and restored. Positively, the LSP was impressed that this option would help to achieve a fairer society and benefit a wide range of people.

“More emphasis needs to be given to developing ‘stronger communities’, not just providing community facilities”.

“Create networks through integrated facilities.”

Housing

Again, housing was a dominant issue for discussion – the main point was the need to deliver affordable housing throughout the JCS area via a mix of housing types, across urban and rural locations.

Green Belt

In line with discussions relating to both the climate change and economic options the

Green Belt was viewed as a constraint, particularly in relation to the provision of housing and infrastructure required to sustain communities, with Green Belt to the north of Cheltenham not seen to be as effective as Green Belt separating Gloucester and Cheltenham. It was noted that there could be potential to reassess allocation of the Green Belt to meet future housing demand. One stakeholder noted that there is a “need to look critically at the Green Belt as some areas have to be brought back into the [development] equation”. This was mirrored by many participants’ opinions with housing delivery, in particular the need to deliver affordable housing, viewed as a crucial issue. “There needs to be a mix of housing types and tenures in all settlement locations.” “You should build affordable housing in areas throughout the JCS.”

Accessibility

Transport was again raised as an important issue. However, the focus this time was placed on the need to locate new development on accessible routes. It was suggested that development also needs to be located in deprived areas or “on corridors that deprived areas can access.”

Distribution of development

Focusing development on rural settlements with three or more primary services was seen as a sensible approach (eight out of eleven workshop table groups concurred with this strategy). However, the qualitative data suggested three was not enough and five would be a better approach. The groups thought that rural settlements with more services should be made more accessible. One participant urged the JCS team to be bold and “look at [a] successful example - identify what makes them tick” and learn from them. “Rural services must be a quality and good service”. “You need to think beyond urban areas when addressing transport needs i.e. connections to rural hinterland”.

Digital vote – social spatial option

As with the first two digital votes, broad support was shown for the option, with strongest support among Members, and a greater range of opinion among stakeholders and the LSP. 79% of Members, 67% of stakeholders and 56% of the LSP either ‘strongly’ or ‘partly’ agreed that the social option could help guide development for the benefit of the area. However, 28% of the LSP disagreed with the option, and significant numbers in all groups voted ‘neither/nor’ or ‘neutral’ for the first time (notably among Members who had never previously selected the neutral vote).

It should be noted that where individuals disagreed, it was mainly because they felt that the option was in need of some enhancement to ensure it meets the needs of the area and will help guide future development effectively.

In summary

There was a positive response to the underlying aims of the social option, mainly because it was the best spatial option for striking an urban/rural balance. However, a number of participants questioned if it could be delivered.

“Ideally a great option, but how can it come to fruition?”

The different groups liked the spatial option, but they were not convinced that it could lead the development of the JCS on its own. Other common suggestions that would enhance this option were the provision of broadband in rural areas and the encouragement of home working. Stakeholders believed that community spirit was vital and was an omission from the spatial option that needs rectifying.

The discussions further emphasised the importance of housing affordability, and stated that housing numbers should be based on need, and not Government targets. With the demise of the Regional Spatial Strategies (and their housing targets) there is an opportunity to deliver more bottom-up planning. The participants want more consultation on the provision of housing to ensure it is delivered specifically to meet the needs of a community.

The text cloud also highlights 'Green Belt' as a policy priority, which reflects the discussions in each spatial option as described above. Moreover, 'balance' was another popular word. This was stressed throughout the workshops by all three groups and points to a desire to achieve a balanced approach through the JCS.

Looking at policy priorities relating more to specific spatial options: flooding and transport were key priorities for the climate change option, whilst housing was the main priority for the economic option, and community was the dominant issue for the social option.

In summary

One of the aims of the consultations was to establish which spatial option (if any) should lead the development of the JCS. The following pie charts highlight strength of agreement on each individual spatial option, taking all three participant groups as a whole (i.e. bringing together the views of stakeholders, Members and the LSP). While all had specific benefits and limitations highlighted by participants with respect to their fields of expertise (for the LSP and selected stakeholders), or their understanding of public viewpoints (for Members), it is clear that all the spatial options were popular, with two thirds of the whole participant group either 'strongly' or 'partly' agreeing with each spatial option. This suggests that participants want an approach that can balance the needs of economic, social and environmental objectives.

4.4 Guiding Principle

As a final test, after each of the three spatial options had been discussed in some detail, participants were asked specifically if they felt any one of the options should guide the JCS, or if all are of equal importance.

Taking each participant group individually, the stakeholders marginally favour the economic option in leading the development of the JCS, but also place a high priority on taking an 'equal' or 'balance' approach.

The LSP strongly favoured the 'equal approach' in this particular vote, despite earlier debate centring on the benefits of the social option.

The Members also opted for the 'equal approach'. However, the preferences shown in their overall results have a smaller range, and their strength of preference for the 'equal approach' (38%) is perhaps offset by the significant and even (25%) support for the economic and social approaches.

In summary

Again, a balanced approach to sustainable development of the JCS area is the most desired option, reiterating the support shown for the spatial options when considered individually, as illustrated in the 'average group' figures presented in Figure 4. Crucially,

the need for a balanced approach was emphasised throughout the workshops with stakeholders, LSP and Members alike. This is shown in the averages for the three groups where an equal approach had a 42% share of the votes, beating the concept of any single option being dominant in the JCS.

In some part, the levels of support shown for the remaining three options reflects today's political debate and news agenda, with concern for the UK's economic difficulties beating social issues, which in turn beat the less-tangible (to some people) threat of climate change. However, taking a full synopsis of the day, this does not suggest that participants were any less passionate in their debates when discussing issues relating to the social or climate change options.

5.0 CONCLUSIONS

A wide range of opinions have been gathered through the workshops. These will be used to inform the development of the JCS. Numerous issues were discussed and there were significant areas of agreement (for example, the importance of housing issues and the need to improve public transport links throughout the JCS area). There were also areas of contention (for example, the role of the Green Belt), highlighting the different views held by a diverse group of participants. Nevertheless, some common themes emerged from the consultation as follows.

5.1 Strategic Objectives

- Participants were in broad agreement with the strategic objectives.
- The majority of participants thought the strategic objectives could be strengthened in some areas, with 80% (the average for the three groups) noting that there was something missing from the draft presented. The most common areas for development were: affordable housing; the role of the Green Belt; regeneration; jobs; and community.
- Specifically, participants cited a need for affordable housing to be delivered in rural as well as urban areas, with only small scale development in rural areas. Some wanted the Green Belt to be protected; conversely others wanted it to be reassessed to help deliver housing.
- Jobs need to be located where people live and regeneration needs to be in keeping with the local area.
- The JCS should seek to deliver a just and cohesive society.

5.2 Spatial Options

The main finding from the spatial options was that balancing the economic, social and environmental objectives is pivotal to the successful delivery of the JCS. This is reflected in the guiding principle result (see Figure 6) where the average for the three groups was 42% in favour of an equal balance of the three spatial policies.

Significantly, the need to 'strike a balance between competing priorities' was a key theme emanating from all three groups' discussions. A balance between urban and rural is viewed as an essential part of the JCS as the "scale of change should be bigger in urban areas, but not at the expense of rural areas".

Moreover, there needs to be a balance between policies relating to the economy, climate change strategy and the need to deliver a sustainable community.

5.3 Specific Findings

To conclude, participants thought that future spatial options should include more detail on:

- If/how to re-assess the Green Belt to see if/where it could accommodate housing
- Provision of affordable housing across the JCS region that is appropriate to the scale of the area
- Skills creation and how these skills will relate to future jobs provision
- Improving public transport.

Suggested improvements included:

- Locating jobs in proximity to housing to decrease the need to travel
- Specifying how cohesive communities will be delivered
- Emphasising the importance of local food production and protecting the farming industry in general
- Supporting the provision of broadband in rural areas to encourage home working and reduce travelling.

5.4 Recommendation

After extensive analysis, it is evident that the main message emanating from the consultation is the need to take a balanced approach to preparing the JCS Part Two, to ensure the sustainability of a cohesive community. Finally, one stakeholder summed up pertinently the findings of the workshops:

“All options are equally important, but how they are balanced will be key to the success or failure of the JCS”.

Developing the Spatial Options – Parish Council Consultation

Report contents

1.0 Introduction and Methodology

2.0 A strategy focused on achieving resilience to climate change – ‘the climate change option’

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5.0 Locally-specific issues

6.0 Outcomes/Conclusion

Appendix – notes taken at Parish Council meetings

- Shurdington Parish Council
- Brockworth Parish Council
- Bishop’s Cleeve, Woodmancote and Gotherington Parish Councils
- Hucclecote Parish Council
- Uckington, Elmstone Hardwicke and Swindon Village Parish Councils
- Innsworth Parish Council
- Twigworth Parish Council
- Quedgley Town Council
- Longford Parish Council
- Leckhampton and Warden Hill Parish Councils
- Winchcombe Town Council

Parish Council Meetings Report

1.0 Introduction and Methodology

1.1 Introduction

The Joint Core Strategy (JCS) is a partnership between Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council. The JCS will be a co-ordinated strategy guiding how the three authority areas develop up to 2026. It will set out the Councils' approach to dealing with climate change, protecting and enhancing the natural and historic environment, and establishing the location and timing of new housing, employment, infrastructure, community, leisure and tourism facilities.

Preparing a Joint Core Strategy means making choices about how the area will develop, so it's important that local communities are involved and have a say in the future of their area. To ensure the JCS incorporates local concerns and meets Government tests of soundness, consultation exercises (such as that reported on here) will occur throughout the strategy's development.

The finished JCS is currently expected to be published in two parts. Part 1 will include:

- A "Spatial Portrait" of the JCS area, providing a clear sense of place
- A summary of the "Key Issues" faced by the area
- A clear "Vision" for how the JCS area could be in 2026
- "Strategic Objectives" that must be fulfilled to achieve the Vision.

Part 2 will consist of the spatial plans and policies designed (in response to the JCS evidence base and all consultation) to fulfil the Strategic Objectives and therefore achieve the Vision.

This report documents a series of meetings with Parish Councils where options for developing Part 2 of the JCS were explored.

- Chapter 1: Developing the spatial options – stakeholder consultation
- Chapter 2: Developing the spatial options – parish council consultation

Together, these documents will inform the preparation of "Developing Options" which will be published for public consultation in summer 2011.

1.2 Methodology

Meetings were held with 16 parish and town councils between 14th June and 26th July 2010. Meetings were held with those parishes which were most affected by the Areas of Search proposed in the South West Regional Spatial Strategy, together with any parish specifically requesting a meeting.

The meetings were attended by JCS Officers, Development Control Officers and Parish/Town Councillors. The purpose of the meetings was to discuss the three spatial options presented during the stakeholder conferences in June: the Climate Change Option, the Economic Option and the Social Option. By testing these three extremes, the JCS team aimed to identify the strengths and weaknesses of each, and to see whether participants favoured an approach dominated by any one of the approaches, or an approach which seeks to balance the three. More detail is provided on all three of the spatial options in Chapter 1 but is not repeated here.

In writing this report, comments documented at the meetings have been grouped together rather than reported upon individually so as to enable patterns of consensus and opposition to

be seen. Where locally-specific comments were made, these have been listed separately. The notes taken at each meeting are provided as appendices.

This report has been divided into three parts. First, the three spatial options are addressed in turn showing areas of consensus, opposition and issues which require clarification. Second, locally-specific comments are listed. Finally, conclusions are drawn.

PLEASE NOTE: The report provides a synopsis of the consultation undertaken and the issues raised, and not a detailed response to all representations.

2.0 CLIMATE CHANGE OPTION

2.1 Background

This option looks at how the JCS area can develop in a sustainable manner, with a view to enhancing the area's resilience to climate change. Key policies include a reduction in the need to use a private car and the need to divert development away from flood prone areas. Further information is provided in Chapter 1.

2.2 Support

Although this option received the least feedback, the vast majority of that feedback was positive. Participants felt that there are limits to the capacity of the environment, and population growth is significant in taking us closer to that capacity – the JCS should therefore seek to address growth in a way that enhances the area's resilience to climate change. Aspects of the approach that received broad support included:

- **Transport:** transport infrastructure was seen as a key issue in achieving resilience to climate change. Respondents called for an improved bus and rail service (more trains to stop at Ashchurch station) and a light railway serving the area. Support was expressed for placing employment and housing in close proximity, with good public transport and urban design, to increase walking/cycling and to reduce reliance on the private car.
- **Services:** support was expressed for maintaining rural services to increase the sustainability of rural settlements and reduce the need to travel for such services (particularly when people work longer hours and need convenience). The concept of a network of rural service hubs was supported but seen as difficult to implement due to the convenience of the car and people's freedom to travel for greater choice and value.
- **New development:** improvements to social infrastructure and energy efficiency were seen as vital outcomes of any new development, in particular large-scale housing projects. Support was given for new development being built-to-last with high insulation standards and local renewable energy schemes. The need to generate much higher proportions of renewable energy was linked to the issue of 'peak oil' which some respondents felt was close or even past.
- **Flooding:** respondents placed a high priority on flood issues, with strong support for a precautionary approach to flood risk and use of Sustainable Drainage Systems (SuDS).

2.3 Opposition

There was little opposition to this option, though concern was expressed for how the infrastructure requirements would be paid for. It was also recognised that, although there is a desire to meet 'zero carbon' targets faster than current Building Regulations require, the prospect of the development industry achieving this appears too visionary and challenging.

2.4 Clarification/Suggestion

Respondents requested clarification on the following issues discussed under the climate change option:

- **Green belt:** the continued separation of settlements by green belt was seen as important, but it was acknowledged that some new development is required in the area and must be sustainably located. Some parts of the green belt were considered to be sustainable locations due to their access to transport and services. Clarification was therefore requested regarding the future role and form of the green belt.

- **Food security:** agricultural land was viewed as under pressure and in need of protection: the area's ability to produce its own food, instead of relying on imports, was seen as important in the context of future climate change. The JCS area has little Grade 1 agricultural land so it was seen as important to protect Grade 2 agricultural land – and to promote allotments and small-scale local food production.
- **Flooding:** solutions to this problem were acknowledged as expensive and sometimes radical, and requiring political support and the involvement of multiple agencies. Respondents requested clarification on what can realistically be done to combat flooding.
- **Waste:** respondents felt that waste should be disposed of close to where it is generated, thus reducing the need to transport it for disposal and increasing personal responsibility. Incinerators were rejected in favour of high-tech, smaller, local disposal facilities.
- **Reducing the need to travel:** respondents recognised difficulties in encouraging people to work close to their homes and to use local services, when there may be better opportunities, value and choice elsewhere; the reality of car ownership, use and parking must be acknowledged therefore. Control of parking spaces in new developments was variously seen as a good way to restrict car-use, and a waste of time.

3.0 ECONOMIC OPTION

3.1 Background

This option aims to achieve economic resilience across the JCS area. It is an 'urban-centric' strategy, meaning that new development will be concentrated on the main urban areas such as Gloucester, Cheltenham and Tewkesbury / Ashchurch. Further information is provided in Chapter 1.

3.2 Support

This option was received positively due to its focus on addressing problems in the economy – something most respondents expressed great concerned about. Aspects of the approach that received broad support included:

- **Employment:** support was expressed for providing a mix of employment opportunities, to encourage people to live and work in the area, concentrating employment in existing centres with priority given to filling vacant facilities before building new ones. Respondents acknowledged a need to protect existing employers (including heavy industries) while promoting service and high-tech industries, and recognised that attracting new sectors may require major infrastructure investment during difficult economic times.

Respondents considered that investors will only be interested in attractive sites. Gloucester Business Park was cited as an exemplar for new development, providing a good mix of units in a well-designed and landscaped area (though not without its faults – many jobs are part-time and many manufacturing jobs have been replaced by service industries). It was suggested that a science park could be developed on similar lines.

- **Education/training:** respondents supported increasing the number of apprenticeship opportunities, and strengthening the link between education and employment, ensuring that educational and vocational courses provide people with the correct skills for local employment now and into the future.
- **Housing:** support was expressed for providing affordable housing in accordance with the needs of local people, and in association with the creation of new job opportunities. Associated social infrastructure must be in place early in the development cycle, not left to the last minute or forgotten. Support was expressed for home-working, which was seen as dependent on improved broadband infrastructure across the JCS area.
- **Transport:** high quality public transport (including better rail links to London) and full access to junction 10 of the M5 were seen as important to this spatial option. However, doubt was cast on people's willingness to abandon the private car.

Respondents felt that existing communities should be protected from commercial traffic created by mixed use development.

A declining retail offer, combined with the high cost of parking/Park & Ride, was seen as a deterrent to people visiting and spending in the area.

- **Environment:** respondents supported the need for open spaces, the separation of settlements, and the protection of agricultural land. Some respondents expressed support for small-scale development at urban/greenbelt fringe locations, only if such works were shown to be sensitive to the area and could provide a positive contribution to landscape enhancement and social infrastructure.
- **Flooding:** respondents recognised that the majority of brownfield sites in Gloucester's urban area are at risk of flooding. It was felt that sites in lower risk areas should not be

overlooked as these may make a positive contribution to economic development with appropriate flood mitigation measures. Investment in flood defences was supported.

3.3 Opposition

Although this option received much support, there was concern that rural areas would gain little (rural services may in fact decline), and commuting levels would be high (with associated traffic and environmental problems). Objections were also raised to any further southwards expansion of Gloucester, and to any erosion of the character of central Cheltenham and historic Gloucester prompted by such an urban-centric development strategy.

It was felt that the JCS area requires a mix of housing types/tenures and at present there is a dearth of family housing which would be hard to deliver in appropriate quantities on constrained urban sites.

3.4 Clarification/Suggestion

Respondents requested clarification on the following issues discussed under the economic option:

- **Planning policy:** debate occurred about the extent to which the planning system should control development (in the case of major growth areas), and the extent to which it is a barrier to development (in the case of commercial sites which have been empty for long periods but are prevented from conversion to housing).

Focussing development in the urban areas (as detailed in this option) may restrict development opportunities in rural areas which would not then benefit from Section 106 contributions. Respondents felt that the distribution of planning gain across the JCS area required clarification under this option.

- **Employment:** clarification was requested on how businesses can be attracted to the area and where they will come from. Respondents felt the JCS should have a flexible approach to employment uses and planning policy should not be seen as a barrier to investment. While there was a preference for re-using existing empty sites before developing new ones, it was recognised that 'high value' jobs are hard to attract and often prefer purpose-built, out-of-town business parks to town centre locations.
- **Transport:** respondents felt that development should be concentrated to support the use of public transport, walking and cycling, and that the role and scale of Gloucestershire Airport should be considered under this option. Park & Ride schemes were popular if priced and managed properly to encourage use and limit the impact on existing communities.
- **Housing:** respondents generally supported the abolition of Regional Spatial Strategies and the JCS authorities' decision to calculate housing (and employment) need locally. It was recommended that housing growth calculations should be transparent, justified and based on local need (e.g. families, the elderly) and should provide for a proportional increase of the existing stock rather than absolute numbers. New 'edge of urban sites' (if required) should be phased in line with regular reviews of housing need. Some saw development of these sites as preferable to a 'new town'.

Concern was expressed over the prevalence of buy-to-let properties and second homes; the poor quality/design/character/safety of new market and affordable housing; and the provision of rural affordable housing to those with no connection to the area.

- **Flooding:** respondents were sceptical of whether flood-prone urban development sites could be made safe via mitigation measures without increasing risk to surrounding areas.

4.0 SOCIAL OPTION

4.1 Background

The social option focuses on delivering stronger communities through the provision of housing and jobs in accessible locations across the JCS area – and particularly in the more deprived areas. Further information is provided in Chapter 1.

4.2 Support

This option received strong support due to its focus on addressing deprivation, seen as affecting people's lives on a daily basis. The option was described by one respondent as "the logical choice" as they felt that little can be done to stop climate change and current economic problems are too big to be addressed on a local scale. Aspects of the approach that received broad support included:

- **Development strategy:** respondents accepted some 'natural growth' to settlements; supported the use of brownfield in preference to greenfield sites; and wished to maximise the use of empty/under-occupied properties across the JCS area. Support was expressed for creating strong communities and using the JCS to address deprivation. Likewise for the dispersed pattern of development and network of rural service hubs suggested by this option. Respondents wanted any major new development to provide infrastructure to meet the requirements of new residents *and* resolve existing deficiencies.
- **Housing:** as before, the need for a mix of dwelling types and tenures was supported. It was felt that affordable housing should be dispersed within new developments and should not be segregated to one area (though others suggested owner-occupiers do not wish to live next to social-rented properties). Concern was expressed that existing rural communities may become dormitories unless affordable homes are provided to maintain a demographic spread. Local authorities were seen by some as better providers of affordable housing than private developers. Support was given for the provision of new public open space as part of any new development.
- **Employment:** respondents echoed the issues relating to employment, education and training described in section 3.2, above. It was suggested that Section 106 contributions may address training and employment as well as more traditional areas of spending.

4.3 Opposition

Opposition to the social option centred on the impact of major growth areas on existing settlements. Concern was expressed for the quality of urban design in new developments, and their poor integration with existing communities (e.g. through over-use of three-storey houses where two-storeys is the norm, or through poor walking and transport connections). Piecemeal development of isolated estates should be avoided, and design should be sympathetic to existing areas. Many respondents opposed the development of back gardens ('garden grabbing').

4.4 Clarification/Suggestion

Respondents requested clarification on the following issues discussed under the social option:

- **Development strategy:** respondents felt that development must be in keeping with local character, the capacity of the road system and social infrastructure. However there was uncertainty over how infrastructure requirements and existing capacity can be determined, and why planners perceive one site to be more/less suitable than another.

Respondents supported the principle of a strategy for retail/supermarket development (both in- and out-of-town) aimed at protecting town centres and independent stores.

Debate occurred around the need to support rural services, balanced against the quantity of development that may be required to do so in any particular village (perceived as frequently higher than local residents may like to accept). Clarification was therefore sought over what the thresholds are for service support/provision as related to new development. The objectives of this option were seen as potentially conflicting with the aspirations of smaller communities who may not want the additional facilities associated with new development. Consultation must occur at all stages from policy development to planning application.

- **Transport:** respondents suggested that transport modelling is undertaken based on different times of the day and different days of the week, and that information gaps in public transport provision could be addressed by consulting local users and taxi drivers.
- **Affordable housing:** confusion was expressed over the definition of this term, with some respondents viewing it as low-cost market housing rather than the 'professional' definition of the term (social rented housing, part-ownership schemes, etc). Respondents supported a flexible, site-by-site approach to affordable housing targets to secure delivery.
- **Stronger communities:** there was some confusion over the definition of this term and what it means in real terms.

5.0 LOCALLY-SPECIFIC ISSUES

The information below consists of specific comments made by parish councils which could not be generalized but are still relevant to the development of the JCS.

Bishop's Cleeve, Woodmancote and Gotherington

- Debate occurred over the status of Bishop's Cleeve within the settlement hierarchy. Respondents viewed it as a village with "no major services", not a town, and said it should be considered to be outside the Cheltenham sphere of influence as shown on the spatial options map. Woodmancote was described as reliant on Bishop's Cleeve for services and infrastructure, and lacking in land suitable for employment use.
- Request made for:
 - More bungalows (with associated services and healthcare) to cater for the elderly.
 - Improvements to the Bishop's Cleeve-Cheltenham cycle route (which currently ends at the racecourse).
 - Protection for the greenbelt between Bishop's Cleeve and Gotherington.

Brockworth:

- Recent new development in Brockworth was seen as having had minimal success in reducing car usage – indeed pressure has been increased on Ermin Street, the only road in and out of the area.
- Residents were described as resistant to more new housing in Brockworth. Recent new development was described as having little infrastructure to support it.
- Concerns were expressed over local schooling. Brockworth Secondary School is in special measures so parents do not want their children to go there and are moving out of the area or making their children travel elsewhere (with associated traffic problems).

Hucclecote:

- Respondents opposed further new housing as recent development and allocations include land right to the edge of the AONB – "there is no further space".
- Hucclecote is viewed as a village, which orientates itself towards Cheltenham for services primarily due to the perceived poor environment and retail offer in Gloucester City. There is concern that Hucclecote is becoming a dormitory for workers elsewhere.
- Whittle Square is viewed as having potential for restaurant/café/retail improvement.

Innsworth

- Innsworth was viewed as having a functional relationship with Gloucester (which provides the majority of facilities and services), while maintaining a separate identity. Respondents were opposed to Innsworth coalescing with Gloucester.

Longford:

- Concern was expressed over poor local service provision due to proximity and good bus services to Gloucester city centre.

Quedgeley:

- Two out of five Councillors expressed support for development in the green belt between Cheltenham and Gloucester as a sustainable option for growth (green belt was seen as already devalued here relative to other areas).

Shurdington:

- Respondents suggested there was local willingness to accept a quantity (unspecified) of local development provided it is in the right place. Further consultation is required on the possible scale and location of such development.

Twigworth:

- The Parish Council disagreed with flood zones defined by the Environment Agency and recommended that local flood knowledge should form part of the evidence base.

Uckington, Elmstone Hardwick and Swindon Village:

- The Parish Councils did not express support/opposition for any of the options, nor did they suggest any option which should dominate.

Winchcombe:

- The Parish Council supports the climate change and community spatial options in preference to the economic option.

6.0 CONCLUSION

The consultation exercise was successful in highlighting the benefits and problems of the three spatial options, and of highlighting some strengths and weaknesses of each. When presented *individually*, all three options received broad support while having specific issues highlighted for clarification. When respondents were asked to consider all three options *together* and to decide whether one option should be dominant in the JCS, or whether a balanced approach should be pursued, the latter (balanced) approach was the preferred way forward for those who expressed a preference. This finding complements that of the stakeholder consultation events presented in Chapter 1.

Criticisms of the consultation exercise centred on the terminology used: 'spatial options' was seen as confusing by some respondents, since the 'options' presented were viewed more as cross-cutting issues within broad themes. It was also suggested that costs and deliverability were inadequately presented in the exercise, making it harder to make a choice between options. This, and the specific issues reported above, should be considered for future consultation exercises.

Finally, it is important to note that many of the issues reported above under a particular spatial option apply to the other two spatial options as well. Therefore, it is vital that the JCS team considers the report as a whole when progressing/balancing the spatial options, rather than focusing on individual elements.

Feedback from Shurdington Parish Council meeting 14.06.10
6pm – 7.15pm
Shurdington Social Centre

Attendees: JCS team – Claire Cullen-Jones, James Hartley and Paul Skelton. Parish Council – J.A. Sobey, J. Chandler, T.B. Colbeck, M. King, S.J. Mitchell, M.C. Stewart, P.D. Surman

General requests/comments:
Shurdington Parish Council to be notified when TBC SHLAA is published and notified of any brownfield opportunities within the village
Debate occurred on how the JCS objectives will be measured. JCS team advised that the JCS will be accompanied by a monitoring framework.
PC queried whether there will be a green belt view for Tewkesbury since the options may impact on GB.
PC queried whether the JCS team is working with Cotswolds DC since the water which affects Shurdington is coming off the Cotswolds Escarpment.
PC queried what grounds the council has to say no to TBC allocation SD2: what would be the planning reason to turn it down?
JCS team advised that SD2 is an allocated site, whilst waiting for the RSS is no longer a valid argument, the issues of it being prejudicial to the preparation of the JCS and being in advance of the evidence remain the same. It is likely that an application for land within CBC and SD2 will come forward this September.
The Local Plan and emerging JCS will be the framework for considering applications, taking account of any population projections which are expected from the county council. However, it is important to note that the projections will be trend-based and there will still be work for the councils in considering the policy implications related to future levels of growth.
PC considered that the urban extension location proposed in the former RSS was on the edge of the village: this would increase numbers of people but have no real relationship to the village. PC considered that it would be preferable for the village itself to receive a quantity (unspecified) of development.
JCS team advised that the proposed RSS urban extension should be viewed as part of Cheltenham rather than Shurdington, but point taken for reference (NB: subsequent abolition of RSS means JCS will look again at growth locations).
Climate Change Option
Recommend that Grade 2 agricultural land is mapped and that the option clarifies the characteristics of both grades and considers whether Grade 2 could also be protected. Particularly relevant seeing as not much Grade 1 within the area.
Economic Option
Does this option fit with the digital broadband strategy for the UK which is looking to enable more people to be able to work from home – so would you need the urban focus?
Should be a focus on improving rail links to London. Transport links general, public transport and park and ride are all important.
Linkage of education is important and is something that is missing nationally. Are our courses providing people with the right skills for employment?
Should be looking at how to enable development and remove barriers rather than trying to actually do everything through the plan – should recognise some areas – education etc are not the responsibility of local authorities.
Could look at the idea of developing a 'science park' which could be based around Dowty/Aerospace industry.
Not just looking at employment but also apprenticeship opportunities etc.
If you live in the JCS area and spend money here, is it a problem if you work elsewhere?

Feedback from Brockworth Parish Council meeting 21.06.10
11.00am – 13.00pm
Brockworth Community Centre

Attendees: JCS Team – Tim Watton, Claire Rawlings, Georgina Woods and Oliver Rider. Brockworth PC: Jim Hunt, Carole Neal, Jude Perez.

<p>Economic Option Rural areas won't get much from this option, but there are less people there anyway so not too much of an issue. They will have to commute and they are heavily protected by rural residents, with little infrastructure in rural areas to support development. Concerns that people will continue to use cars and won't use bus or cycles. Development should be concentrated to support public transport. There is new development in Brockworth but people still travel by car. There is not enough parking provided but this has still not discouraged people using their cars. We need to look long-term.</p>
<p>Stronger Communities Option Tewkesbury Borough Council is aiming for 30-35% affordable housing. It was suggested that Bishops Cleeve is having a meeting to say that they have had enough affordable housing. Brockworth PC feels that they have had enough affordable housing too. Commented that the houses are built but without the infrastructure to support them. But it was appreciated that there needs to be a lot of houses to support services, but residents don't want the development. They want affordable housing regarding the price, but they don't want social housing. It was felt that people don't want to live next door to social housing. It was felt that this was the logical option as there is not much we can do about climate change and the economy is poor.</p>
<p>Climate Change Option It was felt that agricultural land is disappearing and that this is a big issue for the area. We won't be able to support the development and population. Dairy herds are disappearing, due to supermarket price demand. If there was a major disaster we would struggle to support the population. We must reach a point when we can't do anymore, when we have reached the environmental limits. It was felt that population increase is the cause, as Brockworth had little development but there have been large amounts of development and growth in recent years. The green belt should prevent Gloucester and Cheltenham merging, but news development needs to go somewhere. It was felt that we would struggle to ensure people used their local services.</p>
<p>General Comments No more housing ss wanted in Brockworth. It was felt that Stroud District is putting its housing in Brockworth, but there is no infrastructure to support it. Jobs are being lost but there is still more housing being built. Where are the jobs for these residents? At Brockworth people can easily get on the motorway and go to Bristol. North Brockworth is agricultural land. There is a need to keep our food production as we rely on imports.</p>

**Feedback from Brockworth Parish Council meeting 21.06.10
11.00am – 13.00pm
Brockworth Community Centre**

<p>Brockworth Secondary School is in special measures so people don't want their children to go there and are moving out of the area for a better school. Or people would prefer to travel out of the area rather than go to the local school.</p>
<p>All development in or around Brockworth puts pressure on Ermin Street as it all has to use this one road to get in and out of the area.</p>
<p>It was felt that there was a need for more manufacturing, or we will become a nation of shop keepers, as we don't produce or make anything anymore.</p>
<p>There is a need for more public open space, there is no park in Brockworth. Invista are proposing development on play / sports area. It was felt that the gardens and environment at Coopers Edge is good.</p>

**Feedback from Bishop's Cleeve, Woodmancote and Gotherington Parish Council 24.06.10
7.00pm – 8.30pm**

Attendees: JCS Team – Tracey Crews, Claire Cullen-Jones, John Hinett from JCS team. Bishops Cleeve PC: Peter Lightfoot, Ann Lightfoot, Geoffrey Jackson. Woodmancote PC: Judith Wray, Charles Kaye.

<p>General requests/comments:</p> <p>Housing needs – there is a need for more bungalows within the area (particularly Tewkesbury Borough) to cater for the needs of the elderly. Need to ensure that bungalows are provided and that the appropriate services and healthcare are provided also. Suggest consulting with the PCT, GOOPA and Age Concern.</p> <p>JCS team advised that the Strategic Housing Market Assessment will provide information on the type of properties considered and under PPS3, we are able to indicate the mix of housing type and tenure on sites. Also consulting with the PCT and Age Concern, will look into GOOPA and be aware of the issues when considering options.</p> <p>Will the JCS look at the Government's commitment to bringing empty homes back into use?</p> <p>JCS team advised: yes, each council produces an Empty Homes Strategy and long term vacant properties are recorded on Council Tax records. The number of empty properties is monitored.</p> <p>What will the JCS policy be on Green Belt be? If Green Belt stays the same, what will happen to proposed housing sites? JCS shouldn't consider development within the Green Belt. What would the position be if the JCS did identify developing in the Green Belt?</p> <p>JCS team advised: As part of the JCS process the local housing and employment need will need to be decided, this level will then inform discussions surrounding the range of sites required.</p> <p>The Interim Housing Strategy needs to be reviewed.</p> <p>Bishop's Cleeve shouldn't be included within the Cheltenham sphere as shown on the spatial option maps.</p> <p>Access routes and restrictions should be shown on maps</p> <p>Character of Tewkesbury is different to that of Bishop's Cleeve</p> <p>Should not have the position of 'leap frogging' to the north of Bishop's Cleeve because of Green Belt.</p> <p>What happens to applications 'in the pipeline', decision on Innsworth will be an important one.</p> <p>JCS team advised: We have a duty as statutory planning authorities to consider all proposals submitted as planning applications, with each application considered on its merits. In light of the abolition of the RSS the planning context has significantly changed and this would need to be taken into account.</p> <p>The Sustainable Communities Act gives local people a greater role in the process and includes the need to consult with Parish Councils. Parishes would request that they be given their own power to determine their future within the JCS process.</p> <p>Parish Council would like more involvement in JCS process.</p> <p>Economic Option</p> <p>If we want to attract business into the area, need to improve transport routes and M5 junctions. Need to change traffic priorities.</p> <p>Main traffic corridors should be shown on maps</p>
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**Feedback from Bishop's Cleeve, Woodmancote and Gotherington Parish Council 24.06.10
7.00pm – 8.30pm**

There are numerous vacant properties and with Headquarters leaving Cheltenham, where is this option envisaging these businesses will come from? Can the JCS allow for more flexibility for employment uses to ensure that planning is not a barrier?
Would need to be a major change in infrastructure to attract new sectors, should fill vacant properties first
Is it possible to significantly change infrastructure? What can we do for empty properties?
Stronger Communities Option
People are choosing to live in Bishop's Cleeve even with no major services, it's like a village.
Need to consider whether the smaller areas can accommodate development and also whether they would want those additional facilities.
Not fair to continue putting development at Bishop's Cleeve.
Need to consider the viability threshold for facilities
There is a risk that smaller communities may lose their identity with new housing estates being developed around the periphery.
It can be safer to use the car in some instances where developments are segregated by a main road.
There is a good bus service from Bishop's Cleeve to Cheltenham
Woodmancote would find it difficult to identify land suitable for employment use. Woodmancote relies on Bishop's Cleeve for infrastructure.
Requested to be engaged in the settlement audit
There is a problem with young people in Bishop's Cleeve not being able to afford housing. Would like to see a priority for providing local people with affordable homes. Could exception sites be provided?
Need larger affordable housing
Could consider settlements for development under this option to be ones which want infrastructure/growth, such as Stoke Orchard
Environmental / Climate Change Option
Cycle route from Bishop's Cleeve to Cheltenham stops at the racecourse. Route should be improved.
Railway infrastructure – there is a good service from Ashchurch which could be improved by more trains stopping at Ashchurch.
Building on arable land is not sustainable.
Would like advice on what future development might look like. 2.5 storey developments is a big concern for Bishop's Cleeve.

**Feedback from Hucclecote Parish Council meeting 28.06.10
6.30pm – 8.30pm
Pineholt Village Hall**

Attendees: Claire Rawlings, James Hartley and Oliver Rider from JCS team. Mrs Pat Grant-Hudson, Mrs Barbara Martin, Mr David Martin, Mr Rob Jefferies in attendance from Hucclecote PC.

<p>General requests/comments:</p> <p>Hucclecote PC felt there was no room to expand as nearly everything outside of AONB was allocated. There were also issues associated with the area becoming a dormitory for workers elsewhere. There were concerns over the amount of cars using the residential streets for parking for the business park. Also concerns over the current proposed units which are above 2 storeys – this is seen as inappropriate for a rural edge area. They feel they are a village but seen as an urban area.</p> <p>Top three wish list for improvements to Hucclecote: (i) No housing above 2 storeys, (ii) Better community facilities, (iii) Better bus links to Cheltenham and Gloucester – only runs from main road through Brockworth and Hucclecote.</p> <p>The Parish also suggested that they orientate themselves towards Cheltenham and look to it for services primarily due to the poor environment and retail and services offer in Gloucester city centre.</p>
<p>Economic Option</p> <p>Should not mitigate or build on areas that flood</p> <p>High value jobs are hard to attract to the area and those that are attracted often want to be on business parks and not in the town centres or elsewhere.</p> <p>The existing Gloucester Business Park is a good model of how to build them. It has a good mix of units and is beautifully landscaped. However, the business park has a lot of part-time workers and a lot of manufacturing has closed to be replaced by more services.</p> <p>The area has other problems including lack of family housing. There has also been a historic problem of not providing the required infrastructure before development.</p> <p>Must accept some development in Tewkesbury (town) otherwise it will die. But some growth also needs to be given to Gretton and Greet to sustain them.</p>
<p>Stronger Communities Option</p> <p>Infrastructure needs improving to cater for increased demand e.g. road linkages to hospitals – these will still only be in the larger centres possibly a long way from the other settlements</p> <p>Real problem of how you create a stronger community with stronger facilities – Cooper’s Edge was originally designed to have a small high street but the Tesco scheme came along and this was dropped. Need to attract niche retailers not Tesco etc. How can we stop butchers / bakers from shutting in our existing areas let alone in a new centre where they have not even opened? There is hope however, that the Whittle Square scheme at Brockworth / Hucclecote could deliver a café bistro culture in a cosmopolitan square.</p>
<p>Climate Change Option</p> <p>Infrastructure is key. More and more people work longer hours or shift patterns – in the rural areas people will still need access to 24-hour services as they can get in some urban areas. Minimum is longer bus services (24 hours if possible). How do you get people to shop locally at things such as the farmers’ market when it is 10% dearer (or more) than the supermarket.</p>
<p>Closing Comments</p> <p>Hucclecote Parish Council wants to get to zero carbon as soon as possible but stronger communities option is preference. Economic option brings problems for Hucclecote Parish.</p>

Feedback from Elmstone Hardwicke, Uckington and Swindon Village Parish Council meeting 29.06.10
7:00pm – 8.30pm
Montpellier Room, Cheltenham Borough Council Offices

Attendees: JCS Team – Tracey Crews, Alex Herbert and Joan Desmond. Elmstone Hardwicke PC: N. Allen, M. Troughton, Ken Preece. Swindon Village PC: Peter Allen. Uckington PC: S. Haublyn, Kathryn Oakey, Teresa Rooney, Martin Beirne, Mike Griffiths. Cheltenham BC: Cllr Bernard Fisher, Justin De Vries (observer), Rachael Adams (observer).

<p>General requests/comments:</p> <p>Several of the PC participants were expecting the JCS team to present new growth projections and locations for the JCS area at this meeting, in response to the recently announced abolition of the SW RSS. This had not been the team's intention (such work will not be ready for some time – timetable to be determined), and it was unclear how the expectation had arisen. The situation was explained and participants were given a short, verbal summary of the intended presentation, then asked if they wished to proceed with the meeting. The meeting went ahead, albeit with only periodic reference to the presentation prepared – the bulk of the time being spent on a general discussion of the development issues facing the JCS area, and specifically NW Cheltenham.</p>
<p><u>General housing/development issues</u></p> <ul style="list-style-type: none"> • Affordable and availability of existing houses are both important local issues. Affordable housing should be located within new developments. • Local Authorities should build affordable houses, not developers. The profit margin is not there for developers to build affordable housing. • PCs would like any new urban extensions or major growth areas to integrate with existing communities, rather than forming separate communities. • Concern was expressed over existing villages becoming dormitories / retirement villages unless affordable homes provided for other demographics. However, strong concern also expressed over the nature of and need for growth. RSS approach strongly opposed – broad support for 'localism' approach advocated by new Coalition Govt. • PCs feel they have been ignored and their views not taken into account in relation to the former-RSS's proposed NW Cheltenham urban extension.
<p><u>Sustainable Transport</u></p> <ul style="list-style-type: none"> • Park and Ride schemes – existing communities suffer when cars park in nearby streets to avoid paying for P&R. Increase of car fumes. • Protect existing community from commercial traffic created by new mixed-use development. Development should be scaled down when approaching existing villages. • S106 contributions from major new developments should benefit existing local communities – not just the proposed developments.
<p><u>Stronger Communities</u></p> <ul style="list-style-type: none"> • CBC requires over 900 affordable homes in the next 5 years. • Social implications: <ul style="list-style-type: none"> ○ Single person households in large houses; ○ More elderly people; ○ More single parent families • Need to maximise use of empty properties in Cheltenham – local Cllr advised that empty RSL properties are generally filled within 5 days, worse scenario is 5 weeks. Need to maximise use of other empty (non-RSL) properties remains.
<p><u>Economic Resilience</u></p> <ul style="list-style-type: none"> • Most brownfield sites in Gloucester urban area have high flood risk. • All 3 boroughs in JCS flood. If you cannot build in flood-risk urban areas, then building in the Green Belt is the only other option. PCs preferred to

**Feedback from Elmstone Hardwicke, Uckington and Swindon Village Parish Council meeting 29.06.10
7:00pm – 8.30pm
Montpellier Room, Cheltenham Borough Council Offices**

<p>mitigate flooding issues to enable development in urban areas.</p> <ul style="list-style-type: none">• There are many existing buildings in the town centre which are empty and could be converted into houses. Employment policies currently prevent this. See last bullet above.• No shortage of employment premises. Policies should perhaps be more relaxed to prevent premises becoming empty. <p>While each of the three spatial options were touched upon during discussions, the JCS team were not able to go into detail on any of them, and the PCs therefore did not express support/opposition to any of them, nor did they suggest any option should dominate.</p>

Attendees: Anouska Francis, Adam Gooch, Paul Skelton from JCS. Chris Hunt (Innsworth PC), Steven Riddick (Twigworth PC), Bill Whelan (Innsworth)

<p>General requests/comments:</p> <p>BW requested that a message be passed to Maiden that publicly available information be kept more up-to-date as often it can be several years old. BW asked if, during future consultation events, an event could be held in Churchdown. It was requested that all Parish Council's should be notified of the publication of the consultation report in writing.</p>
<p>Part 1</p> <p>Objectives - it was questioned why Churchdown and Brockworth were not identified as having high deprivation. JCS team explained that those wards identified in Part 1 as suffering from the highest levels of deprivation were done so through official IMD research and these were found to be within the highest 10% most deprived wards in the country. JCS team highlighted that not mentioning a ward in the portrait did not mean its needs would be ignored.</p> <p>Respondents felt that the EA Flood Maps were often incorrect. In addition, local knowledge of floodplain needs to be taken into account.</p> <p>Affordable housing - it was asked that a full definition of affordable housing could be provided in future publications.</p> <p>It was considered by attendees that Innsworth has a functional relationship with Gloucester - the people of Innsworth use Gloucester for the majority of shopping, facilities and services - but Innsworth retains a separate identity and the idea of coalescence with Gloucester was not supported. It was considered the situation in Churchdown would be different, probably 50/50.</p>
<p>Stronger Communities Option</p> <p>Concern was raised that many of the objectives of the option conflict with the aspirations of some of the smaller communities (i.e. the villages) - the very people that the option was designed to 'help'. Natural growth of rural settlements is important. The type and mix of affordable housing very important, not just the quantity.</p> <p>Down Hatherley was felt to be suitable for some small scale infill development.</p> <p>It was considered that the use of primary services as a tool for identifying a settlement hierarchy was simplistic. The services need to be identified with quality of service seen as far more important than quantity. The suggestion of the establishments of service 'hubs' in rural areas was supported.</p> <p>Generally the aspirations of this option were supported though there was concern about how it could be delivered in practice.</p> <p>Preference for parish councils to negotiate facilities at planning application stage via S106 rather than being prescribed at site allocation stage.</p>
<p>Economic Option</p> <p>General support for ensuring that development is concentrated on existing centers. There should be a mix of employment opportunities to encourage people to live and work in the area. The need to protect existing industries was highlighted - particularly the 'harder' industries - the JCS should not try and lever in higher-end service industries at the expense of existing harder industries.</p> <p>Sites within the lower flood risk areas (particularly central regeneration areas in Gloucester) should not be ignored as they could make a positive contribution to economic development through the application of flood mitigation measures. Investment in appropriate flood defenses should be made.</p>

The aspiration of creating a top quality public transport system was supported but the point was made that to a certain extent the quality of the service doesn't matter - it will never be able to compete with the private car. Education of young people to walk/cycle was seen as more important than infrastructure to enable people to do so.

Support for small scale development at urban/greenbelt fringe locations. Sensitive small scale development could be positive as could contribute to landscape enhancement or 'greening the greenbelt'.

Housing numbers should be based on community needs rather than planning for in migration, the increase should be based on a proportional increase of the existing stock rather than adding excessive numbers.

Feedback from Twigworth PC Meeting 05/07/10
Twigworth Church, 7-9pm

Attendees: Adam Gooch, Anouska Francis and Oliver Rider from JCS team. George Sharpley (Twigworth PC), David Joy (Down Hatherley PC), Steven Riddick (Twigworth PC), D Clayton (Twigworth PC), J Hird (Twigworth PC), V Gardener (Twigworth PC).

<p>General requests/comments:</p>	<p>Part 1</p> <ul style="list-style-type: none"> • Those present wanted to register objection to the EA flood zones and recommended that knowledge of local people form part of the evidence base. It was felt that no one had adequately defined the flood plain especially frequency and timing of flood events. Some discussion occurred around the SFRA Level 1 evidence base and how this would be used in the future. Elements of the SFRA Level 1 map for the area were felt to be incorrect. • Development in rural areas needs to be of a scale in keeping with the capacity of the road system and other infrastructure. It was asked how infrastructure requirements for new development would be determined. JCS Officers set out the role of SIDP. • Clarification was sought on the weight that can be attributed to the JCS now and as we move through the process. Officers explained at present very little but more as we go through the process and options are refined.
<p>Economic Resilience Option</p> <ul style="list-style-type: none"> • Concern was raised over the flood mitigation techniques utilised under this option as it would have the impact of pushing flood water downstream where it could cause greater harm. • Support for maximising the use of brownfield land. • Support objective of protecting greenbelt - would help protect good quality agricultural land which would have a positive impact on the economy. • If all development needs could not be accommodated on brownfield land in the city and town centres additional land should be utilised on the edge of the main urban areas rather than looking at a new town option. Though this shouldn't be around Twigworth. • If new edge urban area sites are required then serious consideration should be given to phasing - perhaps in accordance with reviews of housing need. • Public transport provision would need to be seriously improved under this option. The shelved Elmbridge Parkway would have been ideal. However it is always going to be difficult to get people out of their cars. 	<p>Resilience to Climate Change</p> <ul style="list-style-type: none"> • Support the principle of requiring much higher proportions of renewable energy in new developments. • This option looks at placing shops, services and facilities in closer proximity to local communities - but what power do the LPAs have in making this happen? For example, the NHS is moving towards 'polyclinics' and won't entertain smaller community services. • From the perspective of Twigworth Parish Council, the priority of affordable housing was fairly low. Flooding was a much greater priority. Should be pushing for low-cost market housing rather than the planners' definition of affordable housing.

**Feedback from Quedgeley TC Meeting 08/07/10
Quedgeley Community Centre, 7-8.30pm**

Attendees: Tim Watton and Alex Herbert from JCS team. Quedgeley PC: Anna Mozol, Graham Smith, Nicholas Lee, Julian Powell, Roger Langston

<p>General requests/comments:</p> <p>Part 1: Strategic Objectives</p> <p>Broad support expressed for strategic objectives. Limited time to comment in detail during meeting, but PC will endeavour to respond in detail online. Support expressed for joint-working across the JCS area.</p>
<p>Economic Resilience Option</p> <ul style="list-style-type: none"> • Support expressed for JCS addressing job provision, and helping improve deprived urban areas • Support expressed for regeneration of Gloucester city centre • Concern expressed over continued southwards expansion of Gloucester • Concern expressed over impact on rural communities of this option • Concern expressed over public transport provision ever being good enough to support this option. • Two out of five Councillors expressed support for development in the green belt between Cheltenham and Gloucester as a sustainable option for growth (green belt seen as 'already devalued' here)
<p>Resilience to Climate Change Option</p> <ul style="list-style-type: none"> • Existing inefficiencies need to be addressed in parallel to setting standards for new development – e.g. insulation of existing housing stock, loss of power in transmission etc. • Support expressed for placing work and housing in close proximity • Support expressed for initiatives to limit car use – e.g. through improved public transport, through urban design, through land-use planning etc.
<p>Stronger Communities Option</p> <ul style="list-style-type: none"> • Support expressed for JCS addressing strong communities and pockets of deprivation • Deprivation was viewed as affecting people's lives on a daily basis (e.g. Quedgeley has suffered from decline in manufacturing industries and resulting unemployment), therefore this option was seen as having significant importance • Good urban design seen as important in supporting strong communities – link areas of new development to existing urban areas to avoid piecemeal development / isolated estates; provide adequate social infrastructure to provide for new residents and resolve existing deficiencies
<p>Conclusion</p> <p>Strong support expressed for the overall strategic objectives, the three spatial options, and the consultation content and strategy. All three spatial options seen as important: the JCS must strike a balance. However, the Climate Change option is being addressed most effectively by national policy, meaning local policy could focus (to some extent) on Economic and Social options. However, the emphasis was on balance across the 3 options.</p>

**Feedback from Longford Parish Council, 14/07/10
7.00pm – 8.30pm**

Attendees: Adam Gooch, Claire Cullen-Jones and Paul Skelton from JCS team. Longford PC: Janet Jenisch, Lynn Gough, Peter Gough, Brendan McInerary, Malcolm (no surname provided on sign-in sheet)

<p>General requests/comments:</p> <p>JCS should clearly explain where the three spatial options have come from. Should consider the wording of options to ensure it is understandable to the public. Should also be careful with use of acronyms</p> <p>Location of supermarkets on the edge of towns is OK for people who drive, but what happens for older people/those who can't drive?</p> <p>What is happening with relationship with Stroud? Why aren't they included?</p> <p>JCS team advised that Officers are in contact with Stroud and via County work on infrastructure, cross boundary issues are being identified and picked up. JCS team to consider whether this relationship needs to be publicised.</p> <p>Respondents felt that Cheltenham, Gloucester and Tewkesbury will all merge in time.</p> <p>All options should include costings as otherwise it gets people's hopes up.</p> <p>JCS team advised: A Viability Assessment will accompany later stages of the document. At this stage the options are only being formed and consulted upon with stakeholders. To avoid costly work which may be altered at a later stage, it is not appropriate to undertake costings at this time, but take the point that it is a vital factor in the decision making process to ensure that options are viable and realistic.</p> <p>There is a lack of option/development space in Tredworth</p>
<p>Economic Option</p> <p>Think that the JCS will be economically driven because of the current climate. Reference to employment, thinking about 'Big Society' proposals, should also address the voluntary sector as well. Reliance on people.</p>
<p>Stronger Communities Option</p> <p>Need to take account of ageing population</p> <p>Need to include a section on safety – fear of crime – actual and perceived. Cycle routes, open spaces – do they feel safe? Will they be used?</p> <p>Doesn't include info about the structures in place for a person to do the work themselves, this is a Big Society focus and this option should be linked.</p> <p>Need to provide more allotments, even if larger gardens are also provided because of the social benefits of allotments</p> <p>What would the proposed mix of housing be? JCS team advised: mix would be based upon local evidence taken from the Strategic Housing Market Assessment and the Housing Needs Assessment.</p> <p>Would the quality of market and affordable housing be the same – would you be able to tell the difference? JCS team advised: no, there should be no differences in design quality between market and affordable housing. Currently, affordable housing has to meet a higher Code for Sustainable Homes standard than market housing.</p> <p>Do not support people having affordable housing in rural areas if they do not live/have a connection there.</p> <p>Should look at restricting Buy-to-Let and second homes – do Cotswolds DC have a second homes policy?</p> <p>Rental properties do have a place to play within the market and provide an element of choice for people who can not/do not wish to buy. JCS team to consider how Cotswolds DC addresses the issue of second homes.</p>
<p>Climate Change Option</p> <p>Flooding is an issue for Longford, however solutions are expensive and radical proposals would need political support and a number of agencies</p>

involved. Therefore, what could realistically be a flood outcome for Longford?
Would recommend that all development is away from flood risk areas.
Focus on SUD's/drainage, however when considering future impact of climate change, need to also consider the need to save water as well as may be likely to have more water shortages
Waste should be disposed of as near as possible to where it is generated, not have to travel across the county. Incinerators are not only option, however should encourage more local disposal of waste. Series of smaller facilities. JCS team advised: County Council responsible for Waste Core Strategy, however, JCS team to consider as part of spatial options.
Should consider building more flats as will run out of land eventually. Consider flats would be preferable to higher density housing, as long as the facilities/infrastructure is provided with them – recycling facilities, retail, parking etc.
Should be building to last
Longford is near enough to Gloucester City Centre, they have a good bus service which is good, however it also means that it is difficult to get services in Longford as it is too close to the city. There is a community facility (church) in Twigworth.
Like the idea of a network hub – but consider that it doesn't work in practice. Car use is very convenient.

Feedback from Leckhampton & Warden Hill Parish Council meeting 13.07.10
7.00pm – 8.30pm
Brizen Young People's Centre

Attendees: Tracey Crews, James Hartley, Oliver Rider and Craig Hemphill from JCS team. Paul Ryder, Yve Jowett, Anne Regan, Adrian Mears, Allan Knight, Denise Rand, Peter Lynch and Amanda Winstone in attendance from Parish.

<p>General requests/comments:</p> <ul style="list-style-type: none"> • The Parish wanted to know what the position was on the new county housing / population figures and would there be any input from the community or would this be decided by the county and/or the 6 districts. • JCS team explained that we would not be going back to a structure plan arrangement. At the moment the discussions are around what methodology to use but the key is that this has to be agreed between the 6 districts and the county otherwise the projections will be inaccurate. • Without the RSS – who is the JCS now responsible to? There is a political imbalance between and even within the councils. How will difficult agreements be arrived at when push comes to shove over issues such as where development will go? • JCS team suggested that there may need to be some form of arbitration but it was not clear at this stage. There is a commitment from all 3 authorities to the JCS however. • Gypsies, Travellers and Travelling Showpeople provision was discussed. How can the councils stop spurious and cynical applications which arrive on a Friday evening with communities then moving onto a site over the weekend? • JCS team set out that the JCS will allocate sites and in doing this it will help to reduce the issues of historic under-provision and therefore it should cut down on the unauthorised use of sites. Also: where there are sites being used which are unauthorised, the enforcement teams from Tewkesbury have worked hard, including over weekends, to work on getting the group off the site. • There was a query about the vision and how there could be lots of visions. How is the final vision decided on? • JCS team advised that a consensus would hope to be reached as with all consultation. The consultation on this is currently taking place until 9th August
<p>Economic Option</p> <ul style="list-style-type: none"> • There is not enough focus on vocational training. • Support open spaces but also recognise the need for employment • Need to avoid building ghettos with rat-runs that can't be policed. Instead need to build communities that have ownership. If you build a nice development, people will want to live there and communities will develop. Tacking development onto the edge of existing communities will just merge areas together. • Where will development go? Need to look at the airport. Cheltenham is an attractive town; this should not be eroded. • Tourism has a primary role, retail can feed off this.
<p>Stronger Communities Option</p> <ul style="list-style-type: none"> • Need to make provision for migrants population; both housing and jobs. • Don't forget about local needs e.g. declining retail offer. Post office is an essential service. • Businesses need to be sustainable. Need to sustain manufacturing industry. Should focus on hi-tech and design industry e.g. Oxford Science Park as a best practice example. Look at what are viable industries. • Other brownfield areas should be identified. • S106 need to think creatively, not just traditional uses e.g. look to provide training for staff as part of employment development

Feedback from Leckhampton & Warden Hill Parish Council meeting 13.07.10
 7.00pm – 8.30pm
 Brizen Young People's Centre

<ul style="list-style-type: none"> • Apprenticeships should be supported. • Care Homes may bring in wealth e.g. Painswick example however, it is difficult to deliver affordable housing in these sorts of schemes.
<p>Climate Change Option</p>
<ul style="list-style-type: none"> • Green/environmental issues and climate issues appear to be mixed up. Need to define exactly what this objective is. • Focus on low carbon • Need to recognise that there is a problem where main rivers meet. • Need to meet zero carbon targets but doing so by 2016 is already looking challenging so accelerating this is not a good idea. • Should implement a light railway scheme for the area. • Need to achieve local employment if this option is going to work. • We need to take account of peak oil. • Investors will only be attracted to key and attractive sites. Brockworth Business Park should be seen as an example of best practice. • Declining retail offer is an issue along with parking charges in the town centre and park and ride too expensive also.
<p>General</p>
<ul style="list-style-type: none"> • Use of terminology spatial 'options' is confusing. Suggest wording is changes to issues. JCS has not presented options, but a range of cross-cutting issues within broad themes.

<p>General requests/comments:</p>
<p>Part 1: Strategic Objectives</p> <ul style="list-style-type: none"> • Backland and garden land development was a concern. Need to ensure that physical access onto the site is suitable. • Concern was expressed that time periods for responding to consultation documents was inadequate. A minimum of eight weeks for consideration is required with some notification of the consultation period to be highlighted. Email notification of consultation is the preferred method. • All present were reassured that consultation on the JCS is viewed as a continuous process and any comments made until pre-submission would be taken into consideration. Issues and concerns at an early stage would help to shape the policies being developed.
<p>Economic Resilience Option</p> <ul style="list-style-type: none"> • Focussing development on Tewkesbury/Ashchurch, Gloucester and Cheltenham would mean that there will be few development opportunities and S106 contributions for other areas. How could the planning gain be distributed across the area under this spatial option? • Design approaches for building on flood prone areas should be explored.
<p>Resilience to Climate Change</p> <ul style="list-style-type: none"> • Small scale renewable energy generation should be incorporated into all new development. • Reality of car ownership in rural areas must be acknowledged. Adequate parking provision is needed in all new development regardless of public transport accessibility. Not providing parking spaces puts unfair pressure on existing residents.
<p>Stronger Communities Option</p> <ul style="list-style-type: none"> • Services in Winchcombe are comparable to those in Bishops Cleeve but local employment opportunities are lacking. Focus should be on improving public transport access to existing employment opportunities in Cheltenham, Bishops Cleeve and Tewkesbury/Ashchurch rather than attempting to rebalance Winchcombe into an employment centre. • Caution should be used in defining the quantity and mix of affordable housing in new development as it can make development unfeasible. Instead of applying a percentage across a wide area, JCS policies should focus on examining the mix of housing existing and required in the local area at the time of the application. The housing needs survey for Winchcombe requires updating following the grant of permission for a recent rural exception scheme. • When examining primary services the capacity of services needs to be assessed. There also needs to be transport modelling based on different times of day and week – particularly evenings and Sundays – not just peak time travel. Winchcombe is currently very car-dependent. • Taxis drivers are a potential source of information regarding gaps in public transport provision. • Services attached to new developments could be designated at the planning policy stages but further consultation with communities and parish councils will still be required at the application stages.
<p>Conclusion</p> <p>Winchcombe PC leans towards Climate Change and Community spatial options – not Economic.</p>

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JCS Initial Sustainability Appraisal Summary Report

December 2011

Summary

Sustainability Appraisal is a process that promotes sustainable development by integrating social, environmental and economic considerations into major new plans and programmes. It is a way of ensuring sustainable development is at the heart of plans and policies. This report accompanies the 'Developing the Preferred Option' consultation document and describes the Sustainability Appraisal process that is being used to assess the Joint Core Strategy for Gloucester City, Cheltenham Borough and Tewkesbury Borough.

Scoping of the Sustainability Appraisal was carried out during 2008 and this was used as the basis for the development of a sustainability framework for assessing the Joint Core Strategy. The draft framework was subjected to assessment by statutory consultees and general public consultation before being finalised.

The framework was used to appraise the Joint Core Strategy Strategic Objectives, appropriate changes were then made to them. Following this, work on Spatial Options to guide policy formulation of the Joint Core Strategy commenced. The sustainability appraisal found that none of the options was sustainable and a mixture of the options was necessary. As a result of stakeholder and public consultation and the findings of the sustainability appraisal, a balanced approach was adopted albeit with an economic bias.

The choice of the economically biased spatial option necessitates development peripheral to the major urban areas of Gloucester, Cheltenham and Tewkesbury/Ashchurch. A number of possible broad locations for development were identified surrounding the urban areas. These were subjected to sustainability appraisal and the findings used to identify the broad locations with the highest sustainability. Concurrent with this work, a number of scenarios for development were devised. These scenarios implemented the economically biased spatial option through four different alternatives with varying levels of development at and above urban capacity using the most sustainable broad locations as the focus for a specified level of development and employing a residual residential development figure to be allocated as a result of the consultation.

An Initial Sustainability Appraisal of the scenarios has been carried out. Scenario C is the most sustainable overall but Scenario A, which anticipates the lowest level of development, has the lowest impacts on the environment and Scenario D, which has the highest, is the most socially sustainable. There are likely to be significant effects on the Special Areas of Conservation within and bordering the Joint Core Strategy area according to the Habitats Regulation Assessment screening opinion.

There are a number of mitigation measures which would need to be taken to improve the sustainability of the scenarios. The majority of these are policy measures that could be written into the Joint Core Strategy as part of a suite of development management policies. A draft suite of Core Development Management Policies are proposed within the Joint Core Strategy Developing the Preferred Options Document. These currently set out broad principles for policy direction and will be developed into a Core Policy framework for inclusion within the Preferred Options Document in Summer 2012. Further Sustainability Appraisal work will be undertaken on the impacts of these in order to inform the preferred option policies.

Following this stage of the consultation the strategic objectives will be also finalised and subjected to a further sustainability appraisal which will form part of the submission Sustainability Appraisal Report. The selection of a preferred development scenario will also take place and this scenario will be subjected to an iterative sustainability appraisal and Habitats Regulation Assessment process to ensure that, wherever possible, mitigation measure for any negative impacts are written into the Joint Core Strategy. The Joint Core Strategy will then be subjected to further public consultation in Summer 2012 accompanied by a Draft Sustainability Appraisal Report.

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1.0 Introduction

- 1.01 Sustainability Appraisal is a process that promotes sustainable development by integrating social, environmental and economic considerations into major new plans and programmes. It is a way of ensuring sustainable development is at the heart of plans and policies. This report describes the Sustainability Appraisal process that is being used to assess the Joint Core Strategy for Gloucester City, Cheltenham Borough and Tewkesbury Borough. The report has been devised to accompany the “Joint Core Strategy: Developing the Preferred Option” document that has been prepared for public consultation. It is intended to guide readers through the sustainability appraisal process that has been undertaken to date, summarise the key findings of the appraisal and signpost the documents where more information about the impacts of the proposed scenarios can be found.
- 1.02 The report outlines the requirements for sustainability appraisal under the 2004 Planning and Compulsory Purchase Act (as amended 2008) and defines the scope of the Joint Core Strategy (JCS) and its sustainability appraisal, before describing the sustainability appraisal framework that has been developed through consultation. The latter part of the report concentrates on the sustainability appraisal work which has been carried out on the strategic objectives, the early stages of the development of the strategy and the options for taking forward the JCS. In conclusion, the report describes the next stages of the appraisal process.
- 1.03 The sustainability appraisal (SA) process also incorporates the requirements of the EU Strategic Environmental Assessment Directive, which is designed to ensure that new plans will either enhance or preserve the environment. Throughout the report all references to Sustainability Appraisal include the requirements of the Directive. The JCS is also subject to European Habitats Directive 92/43 which requires any plan or project that is likely to have a significant effect on a European designated site, such as a Special Area of Conservation, to be subjected to an Appropriate Assessment. Scoping and screening of the likely significant effects arising from implementation of the JCS has been carried out and is described in the latter half of the report.

1.1 The Sustainability Appraisal Process

- 1.11 Planning Policy Statement 12: Local Development Frameworks. The requirement is formalised in Statutory Instrument 2204 of 2004 - The Town and Country Planning (Local Development) (England) Regulations 2004, which states that a Sustainability Appraisal Report must accompany all Local Development Documents at adoption.
- 1.12 The Sustainability Appraisal process consists of five stages:
- | | |
|----------------|--|
| Stage A | Setting the context and objectives, establishing the baseline and deciding on the scope of the appraisal process |
| Stage B | Developing and refining alternatives and assessing effects |
| Stage C | Preparing the Sustainability Appraisal Report |
| Stage D | Consulting on the draft plan and Sustainability Appraisal Report |
| Stage E | Monitoring the significant effects of implementing the plan |
- 1.13 To date, Stage A, the scoping of the process, has been completed and Stage B, which assesses and refines alternatives, is currently underway and forms part of the current consultation process. Table 1 provides more detail on the discrete stages which must be undertaken for sustainability appraisal and shows how this complies with the Strategic Environmental Assessment directive.

Table 1: The Sustainability Appraisal/ Strategic Environmental Assessment Process

Sustainability Appraisal Stage	Strategic Environmental Assessment Directive Requirement
A1: Identification of other relevant policies, plans and programmes, and sustainable development objectives	An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes. The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.
A2: Collection of baseline information	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme. The environmental characteristics of areas likely to be affected.
A3: Identification of sustainability issues and problems	Any existing environmental problems that are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.
A4: Development of an Sustainability Appraisal Framework	
A5: Consultation on the scope of the Sustainability Appraisal with the statutory consultees	The authorities designated by Member States shall be consulted when deciding on the scope and level of detail of the information that must be included in the Environmental Report.
B1: Testing the Joint Core Strategy objectives against the Sustainability Appraisal Framework	
B2: Developing the Joint Core Strategy options	Identification, description and evaluation of likely significant effects on the environment of reasonable alternatives. An outline of the reasons for selecting the alternatives dealt with.
B3: Predicting the effects of the draft Joint Core Strategy	The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors
B4: Evaluating the effects of the Joint Core Strategy	
B5: Considering ways of mitigating adverse effects and maximising beneficial effects	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.
B6: Proposing measures to monitor the significant effects of implementing the Joint Core Strategy	A description of the measures envisaged concerning monitoring.
C1: Preparing the Sustainability Appraisal Report	Preparation of an Environmental Report.
D1: Public participation on the Sustainability Appraisal Report and the Joint Core Strategy	The draft plan or programme and the Environmental Report shall be made available to the designated authorities and the public.
D2: Assessing significant changes	
D3: Making decisions and providing information	A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report and the opinions expressed have been taken into account and the reasons for choosing the plan or programme as adopted, in the light of reasonable alternatives.
E1: Finalising aims and methods for monitoring	Member States shall monitor the significant environmental effects of the implementation of plans and programmes in order to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action.
E2: Responding to adverse effects	

2.0 Stage A: Scoping the Sustainability Appraisal

Stage A1 Identification of plans, policies and programmes

Stage A2 Collection and update of baseline data

Stage A3 Identification of key issues

Stage A4 Setting the appraisal framework

Stage A5 Consultation on the SA framework

2.01 The initial stage of developing the sustainability appraisal framework was the scoping of the report. A review of relevant international, national, and local plans, policies and programmes was undertaken to allow sustainability themes from national and local drivers to be identified; this completed stage A1 of the SA process. A list of the plans, policies and programmes of relevance are shown in Appendix 1. Following this assessment, local data was collected to illustrate each of the themes. This data collection had two purposes; it was used to create a baseline which the effects of JCS can be monitored against post adoption and used to identify the key sustainability issues which the JCS would need to address. A summary of all the main issues arising from analysis of the baseline data is shown in Appendix 2. The key issues identified by the analysis included:

- Condition of SSSI – Neither Cheltenham or Tewkesbury are achieving the target for 95% of SSSI to be in either favourable or unfavourable but recovering condition.
- Flooding – there are significant risks from flooding, especially with changing climate.
- Air Pollution – there are an increasing number of Air Quality Management Areas in the JCS Area.
- Brownfield land – high take-up in both Gloucester and Cheltenham means that fewer sites available bringing pressures on garden areas, which potentially impacts on quality of life, opportunities for food growing, wildlife and flooding.
- Employment Land Provision – the need to ensure the provision of future employment land supply.
- Gross Weekly Pay – pay in Gloucester is significantly lower than in Cheltenham and Tewkesbury.
- Affordability – house prices have risen dramatically and fewer affordable homes available. House price to income ratios are very high, especially in Cheltenham.
- Social Deprivation Inequalities – there are significant variations in the level of deprivation between and within the urban areas covered by the JCS.
- Healthy Lifestyles and Health Inequalities – differentials in the number of residents dying early as a consequence of key health problems is evident across the JCS area.
- Education Deprivation – inequalities both between and within urban areas.

2.02 The baseline data has been updated at regular intervals over the development of the JCS. The last update was completed during autumn 2010 and a further update is scheduled for autumn 2011.

2.03 Following the identification of the key issues, a draft sustainability framework was devised. The framework consists of sustainability objectives, decision aiding questions and potential monitoring indicators. Table 2 sets out how the Sustainability Objectives are linked to the key issues. A draft SA scoping report was prepared which outlined the scope of the SA and set out the sustainability framework.

Table 2: Sustainability Objective linked to the Sustainability Themes and Key Issues

Key Sustainability Theme (stage A1)	Key Sustainability Issue (stages A2 & A3)	SEA Topic	Sustainability Objective (stage A4)
Biodiversity	Condition of SSSI, Land Designated as AONB or Green Belt, Air Pollution	Biodiversity, Fauna and Flora, Cultural heritage and Landscape	1. Safeguard and enhance biodiversity and improve connectivity between green spaces.
Climate change	Adoption of Code for Sustainable Homes Level 4, Air Pollution, Car Ownership, Transport Choices	Climate Factors, Air, Biodiversity, Material Assets	2. Reduce contribution to climate change and support households and businesses in reducing their carbon footprint.
Flooding	Flooding	Water and soil, climate factors	3. Adapt to the consequences of climate change. 4. Manage and reduce flood risk and surface water runoff.
Natural Environment and Resources	Brownfield Land, Land Designated as AONB or Green Belt, Condition of SSSI	Biodiversity, Fauna and Flora, Cultural Heritage and Landscape, Water and Soil, Material Assets	5. Protect and improve the quality of natural resources including soil, water and landscape.
Built Environment	Conservation Areas and Listed Building, Air Pollution, Brownfield Land, Town Centre Hierarchy, Hotel Bedstock, Affordability	Cultural Heritage and Landscape, Material Assets	6. Minimise the use of natural resources including soil, water and greenfield land.
Sustainable Transport	Transport Choices, Healthy Lifestyles and Health Inequalities, Employment Land Provision, Car Ownership, Air Pollution	Population and Human Health, Air, Climate Factors, Material Assets	7. Protect and enhance distinctive townscape quality and heritage.
Waste and Pollution	Population and Household Size, Air Pollution, Healthy Lifestyles and Health Inequalities, Transport Choices	Climate factors, Water and Soil, Population and Human health, Water and Soil, Air, Material Assets	8. Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car.
The Economy	Employment Land Provision, Business Stock, Unemployment, Education Attainment, Gross Weekly Pay, Inequality in Labour Markets, Transport Choices	Population and Human Health, Climate Factors, Water and Soil, Material Assets	9. Minimise pollution and waste to landfill
City and Town Centres	Town Centre Hierarchy, Hotel Bedstock, Conservation Areas and Listed Buildings, Transport	Population and Human Health, Cultural Heritage and Landscape	10. Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses 11. Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations

Key Sustainability Theme (stage A1)	Key Sustainability Issue (stages A2 & A3)	SEA Topic	Sustainability Objective (stage A4)
	Choices		
Sustainable Communities	Affordability, Social Deprivation inequalities, inequality in Labour Markets, Healthy Lifestyles and Health inequalities, Education Deprivation, Social Deprivation inequalities	Population and Human Health, Climate Factors, Air, Population and Human health	<p>12. Reduce inequality and promote social cohesion.</p> <p>13. Reduce crime and the fear of crime</p>
Health	Healthy Lifestyles and Health Inequalities, Air Pollution, Transport Choices	Population and Human Health	14. Improve access to health facilities and promote healthy lifestyles.
Housing	Population and Household Size, Affordability, Vacant Homes and Second Homes, Brownfield Land, land Designated as AONB or Green Belt, Adoption of Code for Sustainable Homes Level 4	Population and Human Health	15. Ensure everyone has access to a decent home that they can afford and meets their needs.
Green space	Condition of SSSI, Land Designates as AONB or Green Belt, Brownfield, Healthy Lifestyles and Health inequalities	Biodiversity, Fauna and Flora, Climate Factors, Population and Human Health	16. Create, enhance and protect open spaces.
Education and Skills	Education Attainment, Education Deprivation, Social Deprivation Inequalities, Gross Weekly Pay	Population and Human Health	17. Improve access to education and lifelong learning and enhance skills.
Culture and Tourism	Town Centre Hierarchy, Conservation Areas and Listed Buildings, Hotel Bedstock	Cultural heritage and Landscape, Material Assets	18. Protect and enhance cultural heritage and promote tourism.

- 2.04 The draft SA scoping report was made available to the three statutory consultation bodies identified under the Strategic Environmental Assessment Regulations (2004): English Heritage, the Environment Agency and Natural England. A roundtable discussion of the framework was undertaken and the comments of the statutory bodies were used to revise the framework and the report in preparation for a period of public consultation which took place during October and November 2008. The report was made publicly available on all three Council's websites and was also sent to Gloucestershire Primary Care Trust, the Gloucestershire Wildlife Trust and Gloucestershire County Council.
- 2.05 A number of comments regarding the SA framework were made as a result of the public consultation. As a result of these comments, further changes to the SA framework were made before it was finalised and published on the JCS website in November 2009. Finalisation of the SA framework marked the completion of Stage A of the SA process. A full schedule of consultation comments together with officer responses and a document setting out the full SA framework is available from the JCS website at <http://www.gct-jcs.org/SustainabilityAppraisal/>. The SA framework is also shown in Appendix 3 to this report.

3.0 Stage B: Assessing and Refining Alternatives

3.1 Appraising the Strategic Objectives

3.11 A draft vision and key issues for the JCS were prepared during 2008. The vision and key issues were subjected to stakeholder consultation via an LSP seminar held in November 2008. As a result of this seminar a series of Strategic Objectives for the JCS were developed and changes to the vision made. These were presented as part of the general public consultation on the 'Issues and Key Questions Document' accompanied by the finalised SA Framework carried out in December 2009.

3.12 As a result of the December 2009 public consultation further changes were made to the Strategic Objectives. The revised Strategic Objectives were subjected to a sustainability appraisal at this stage. The results of this can be viewed in Table 4. The revised objectives were presented at a series of stakeholder consultation events in June 2010 and subjected to general public consultation via the JCS website for six weeks commencing in June 2010.

3.13 The pre consultation SA of the Strategic Objectives showed that the majority of the objectives were compliant with the sustainability indicators. However, due to the early stage of development a significant number of the objectives required further strategy development to allow a full assessment to be made. Most importantly a number of the Strategic Objectives were in conflict with two or more of the sustainability indicators. These included:

- Strategic Objective 3: Housing
- Strategic Objective 4: Skills and Education
- Strategic Objective 7: Flooding
- Strategic Objective 8: Natural Environment
- Strategic Objective 9: Climate Change
- Strategic Objective 10: Culture, Leisure and Tourism

3.14 In the broadest terms the conflicts between the SA indicators and Strategic Objectives arose from clashes between social and environmental sustainability wherein the achievement of social sustainability aims would be at the expense of the natural environment. This was naturally a cause for concern and meant that further changes to the Strategic Objectives were necessary to ensure that social progress was not at a high environmental cost.

3.15 Following the consultation and further work on the policy options, the objectives were revisited and revised in line with the findings of the SA and the consultation. The objectives were then subjected to a further SA, the results of which are shown in Table 5. As can be seen from Table 5 the revised Strategic Objectives generally performed well against the sustainability indicators however Strategic Objective 5: Conserve and Improve the Natural Environment, Strategic Objective 6: Promote Economic Growth and Strategic Objective 7: Provide for Local Housing Need were still in conflict with three or more indicators. As a result of this SA a number of changes to the wording of the Strategic Objectives were made; some of these have been taken forward as part of the consultation on the 'Developing the Preferred Option' document that this report accompanies.

Table 4: Summary of the Appraisal of the JCS Objectives Against the Sustainability Indicators - Pre Consultation

Key: + Positive correlation
 0 No significant correlation between the objectives
 - Likely negative impact
 ? Further strategy development required to assess impact
 a Compatible with suggested minor amendments

	SUSTAINABILITY INDICATORS																	
	Climate Change		Flood		Natural Resources		Historic Environment	Transport	Waste/ Pollution	Economy	Urban Centre	Inequalities	Crime/Fear of Crime	Health	Housing	Green Space	Education/Skills	Culture Tourism
	Adaptation	Mitigation	SA3	SA4	SA5	SA6												
Strategic Objectives	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16	SA17	SA18
SO1: Regeneration	?	?	?	?	?	?	+	+	?	+	+	+	+	+	+	+	+	+
SO2: Jobs and Economy	?	?	?	?	?	?	?	+	?	+	a	+	+	+	+	+	+	+
SO3: Housing	-	-	?	?	?	?	+	a	-	+	+	a	+	+	a	-	+	0
SO4: Skills and Education	-	-	?	?	?	?	0	0	?	+	+	+	+	+	+	0	a	0
SO5: Access to Services and Healthcare	+	0	+	+	+	0	0	a	0	0	+	+	+	+	+	+	0	+
SO6: Transport	?	+	a	+	+	0	+	+	+	+	+	+	0	+	+	+	+	+
SO7: Flooding	+	0	+	+	+	+	+	0	0	-	0	0	0	0	-	+	0	0
SO8: Natural Environment	a	-	+	+	+	+	+	0	-	0	a	+	0	+	-	+	0	+
SO9: Climate Change	+	+	-	+	?	0	-	+	+	-	+	+	-	a	-	a	0	+
SO10: Culture, Leisure and Tourism	-	-	0	0	-	0	+	-	-	a	+	a	+	+	0	a	0	a

Table 5: Summary of the Appraisal of the JCS Objectives Against the Sustainability Indicators - Post Consultation

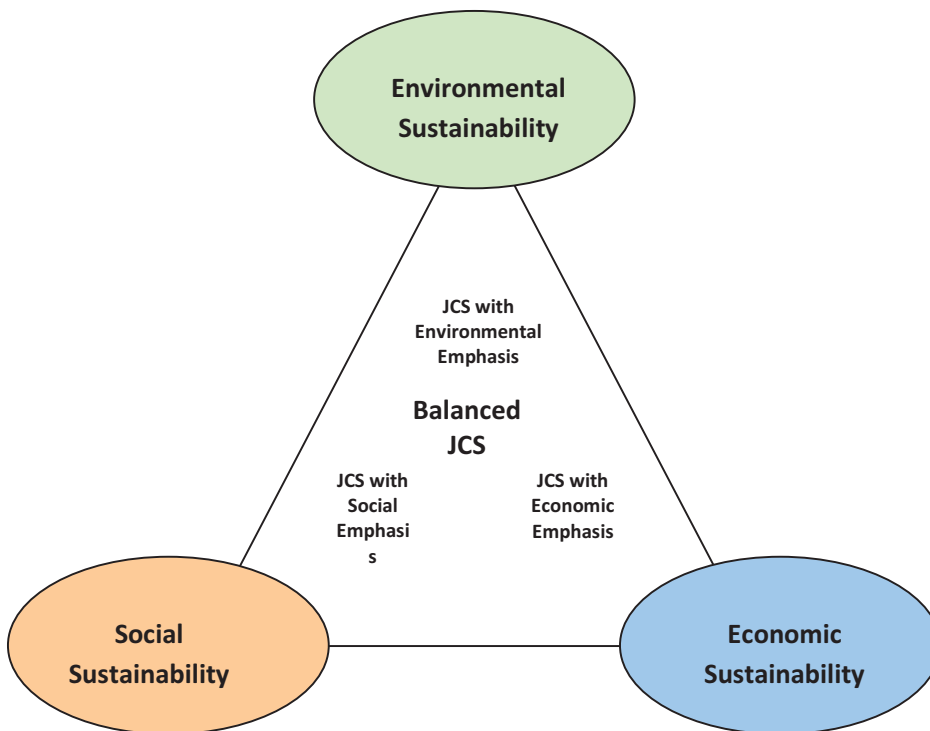
Key: ++ Very positive correlation
 + Positive correlation
 +/- Both positive and negative impacts
 - Likely negative impact
 -- Extremely negative impact
 ? Further strategy development required to assess impact
 0 No significant correlation between the objectives

	SUSTAINABILITY INDICATORS																		
	Biodiversity		Climate Change		Flood	Natural Resources		Historic Environment	Transport	Waste/ Pollution	Economy	Urban Centre	Inequalities	Crime/Fear of Crime	Health	Housing	Green Space	Education/Skills	Culture/Tourism
	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16	SA 17	SA 18	
Strategic Objectives	+	++	+	+	+/-	+	+/-	+	+	+/-	+	+	+	+	+/-	+	?	-	0
S01: Climate Change	+	++	+	+	+/-	+	+/-	+	+	+/-	+	+	0	+	+/-	+	?	-	0
S02: Flood Risk	+	0	++	++	+	+	+/-	0	0	+/-	+/-	+	0	+	-	++	0	0	0
S03: Strategic Development in Urban and Rural Communities	OBJECTIVE HAS NOT BEEN APPRAISED																		
S04: Built Environment	+	+	+	+	+/?	+	+	+	+	+	++	+/-	+	0	+	+	+	+	+
S05: Natural Environment	++	-	+	+	++	+	+	-	+/-	-	0	+	0	+	+	+	+	+	+
S06: Economic Growth	-	-	0	?	+	-	?	+/?	?	++	++	+/-	+/-	+	+	-	++	+	+
S07: Local Housing Need	-	-	-	+	?	?	-	?	-	+	++	+	0	+	++	-	+	0	0
S08: Social Equality	+/-	+	+	++	+	0	0	+	0	+	+	++	++	++	+	++	0	+	+
S09: Skills and Education	0	?	0	0	0	0	0	-	0	++	0	+	+	+	0	0	++	?	?
S010: Jobs and Services	+/-	?	+/?	0	+	0	0	++	?	+	+/-	++	+	++	+	++	+	+	+/-

3.2 Appraising the Spatial Options

3.21 It is immediately apparent from a reading of the SA objectives that it would be impossible to satisfy them all and that a compromise needed to be reached on where the JCS would position itself within the sustainability triangle. The diagram in Figure 1 illustrates this point. To this end the baseline data and plans, policies and programme review were used to develop a series of three 'pure' spatial development options pushing environmental, social and economic sustainability to their limits.

Figure 1 – Positioning the JCS



3.22 The three Spatial Options developed were characterised by the element of sustainability they were biased towards but still had to be realistic in terms of implementation. Table 6 summarises the Spatial Options and lists some of the advantages and disadvantages associated with each. The Spatial Options were subjected to consultation with key stakeholders via a series of seminars held in May 2010 and workshop sessions with fifteen parish councils across the JCS area in June and July 2010. As a result of the consultation on the Spatial Options work it was agreed that, with regard to policy development, the JCS would take a balanced approach with an emphasis placed upon the economy.

3.23 In order to ensure that the elements of the spatial option taken forward were compatible with the Sustainability Objective an SA of the spatial options was carried out. Table 7 summarises the SA of the Spatial Options. The results of SA were fairly predictable given their rather generalised nature; further information was required to enable an assessment to be made for the majority of sustainability indicators. However, carrying out the SA was a useful exercise in that it highlighted some of the ways in which the chosen option could be made more sustainable, for example through the use of policies to require sustainable construction or a certain level of affordable housing within residential developments.

Table 6: Spatial Options

<p>1. A strategy focused on achieving stronger communities JCS policies would seek to strengthen, and meet the needs of, communities by providing housing, employment and community facilities in areas with a recognised need. Such need may result from lack of provision, insufficient capacity, or an area’s poor accessibility to the urban centres and main rural settlements. This approach would result in a dispersed pattern of development across urban and rural areas alike.</p>	
<p>Advantages</p> <ul style="list-style-type: none"> ▪ Seeks to meet the needs of existing and future populations. ▪ Addresses current social issues and seeks to achieve a more balanced and mixed community. ▪ Directs development to accessible locations, in urban and rural areas. ▪ Seeks to make rural areas more resilient in support of existing communities. ▪ Encourages cycling, walking and public transport use. ▪ Seeks to enhance the built and natural environment, and to promote physical and mental wellbeing. 	<p>Disadvantages</p> <ul style="list-style-type: none"> ▪ The strategy’s emphasis on delivery of, and contributions to, affordable housing and community facilities may affect the viability of schemes and redirect investment away from other, equally important infrastructure requirements. ▪ Timescales and viability for identifying and implementing regeneration initiatives in deprived areas (over and above those already happening) may be prohibitive. ▪ Development opportunities within deprived areas are often limited. In order to create opportunities for the benefit of all, the demolition of existing housing or employment uses (which may otherwise be fit for purpose) may be necessary. ▪ Rural locations may be required to accommodate more housing than desired in order to support the desired community facilities.
<p>2. A strategy focused on achieving economic resilience JCS policies would seek to attract investment and development to the major urban centres to establish robust and resilient places which create jobs and in turn wealth, and which support the surrounding JCS area. This strategy would result in urban-focused development, primarily in and adjacent to Gloucester, Cheltenham and Tewkesbury.</p>	
<p>Advantages</p> <ul style="list-style-type: none"> ▪ A focus on the economy provides the greatest opportunity to improve the wealth and prosperity of local residents. ▪ The strategy targets development in more economically sustainable locations and provides the greatest opportunity to deliver urban regeneration which in turn will help to attract further investment. ▪ The strategy focuses development in areas of the JCS with the highest demand for housing/employment and with the greatest potential for delivery. ▪ The strategy directs new housing and employment growth to key centres, allowing for a possible reduction in travel to work journeys, traffic congestion, emissions and air pollution. ▪ The strategy provides opportunities for mixed developments, with a suitable balance of housing, employment, retail and community facilities. ▪ The concentration of development in urban centres reduces development impact on the wider JCS environment. 	<p>Disadvantages</p> <ul style="list-style-type: none"> ▪ Focussing development on the ‘urban west’ of the JCS area may be regarded as neglecting the ‘rural east’ in terms of providing housing and employment. ▪ Focusing development around the most accessible parts of the JCS area could also serve the wider sub-regional housing market encouraging commuting both into and out of the JCS area. ▪ The success of this option is reliant on the delivery of infrastructure to ensure concentrated balanced development is deliverable and workable on the ground. Difficulties in providing this will result in problems with delivery of this urban-focussed approach. ▪ Existing satellite settlements (in areas where development would be focussed) have little surplus brownfield land, meaning delivery may result in a change to the landscape.

3. A strategy focused on addressing the causes and consequences of climate change

JCS policies would seek to reduce carbon emissions (complying with statutory targets of 80% reductions by 2050) and improve resilience to the predicted effects of climate change, while providing for development within the area's environmental capacity. This would result in development consolidated into fewer, larger areas in and adjacent to Cheltenham and Gloucester – or potentially a single new settlement at a size appropriate for a self-contained, sustainable community.

Advantages

- Provides an immediate response to the need to mitigate/adapt to climate change.
- Concentration of development allows for: the protection of environmental assets; safeguards land of the highest ecological and agricultural value; reduces the need to travel; and reduces the impact of flooding on the JCS area.
- A new settlement would minimise the impact of development on Cheltenham and Gloucester.
- Reduces reliance on imported fossil fuels and global and national distribution networks.
- Provides for greener urban areas with more access to biodiverse, open space.
- Allows for more resilient settlements with provision for local food production and energy generation.
- Potentially high provision of social housing and other infrastructure due to economies of scale achievable by the consolidation of strategic development
- Opportunity to establish the JCS area as a location for green industries (building on its high-tech manufacturing heritage).

Disadvantages

- Major impact of strategic development area(s) on the landscape/ biodiversity of the specific selected site(s).
- Strategic development area(s) require a critical mass of development to progress thereby limiting opportunities for development across the wider rural area of Tewkesbury Borough.
- Concentration of development and employment in key centres may have detrimental social and economic consequences for rural communities, threatening their long term viability and the quality of the countryside as a whole.
- Concentrating public transport provision around key areas would lead to isolation of more outlying communities.
- Implementation is reliant on significant infrastructure investment in difficult economic times.
- Demanding high levels of energy efficiency in buildings will impact on viability.
- May increase land take due to the demand for open space, SuDS, urban cooling, etc.

Table 7: Summary of the Appraisal of the Spatial Options against the Sustainability Indicators

Key: + Positive correlation
 0 No significant correlation between the objectives
 - Likely negative impact
 ? Further strategy development required to assess impact

		SUSTAINABILITY INDICATORS																		
	Spatial Option	Climate Change		Flood		Natural Resources		Historic Environment	Transport	Waste/ Pollution	Economy	Urban Centre	Inequalities	Crime/Fear of Crime	Health	Housing	Green Space	Education/Skills	Culture/Tourism	
		Adaptation	Mitigation	Adaptation	Mitigation	Quality	Use													
	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16	SA 17	SA 18		
	+	+	+	+	?	?	-	?	?	?	?	?	?	?	?	?	+	+	?	?
Spatial Option																				
Climate Change	?	?	?	?	?	?	?	?	?	?	+	?	?	?	+	?	+	+	?	?
Economic Resilience	+	?	?	?	?	?	?	?	?	?	+	?	?	?	+	?	+	+	?	?
Stronger Communities	+	?	?	?	?	?	?	?	?	?	+	?	?	?	+	?	+	+	?	?

3.3 Appraising the Broad Locations

- 3.31 The choice of the economically biased spatial option necessitates development peripheral to the major urban areas of Gloucester, Cheltenham and Tewkesbury/Ashchurch. A number of possible broad locations for development were identified surrounding the urban areas. These were subjected to SA and the findings used to identify the broad locations with the highest sustainability.
- 3.32 The Initial SA of the Broad Locations was crucial in helping to identify the location around the urban areas which would be most sustainable with the least sensitivity to development. Figure 2 identifies each of the broad locations on a map. A summary of the SA for each location is given in Table 8. The full SA of each broad location is shown in Appendix 4. The SA of the Broad Locations found that areas G1, G2, G3, G9, C3, T2 and parts of C2, C5 and C6 performed best in terms of sustainability. Broad location G5 performed reasonably well but the majority of the area had already been allocated for development. The broad locations taken forward by the scenarios accord with the findings of the sustainability appraisal.

Figure 2: Map showing the Broad Locations broken down by sub area

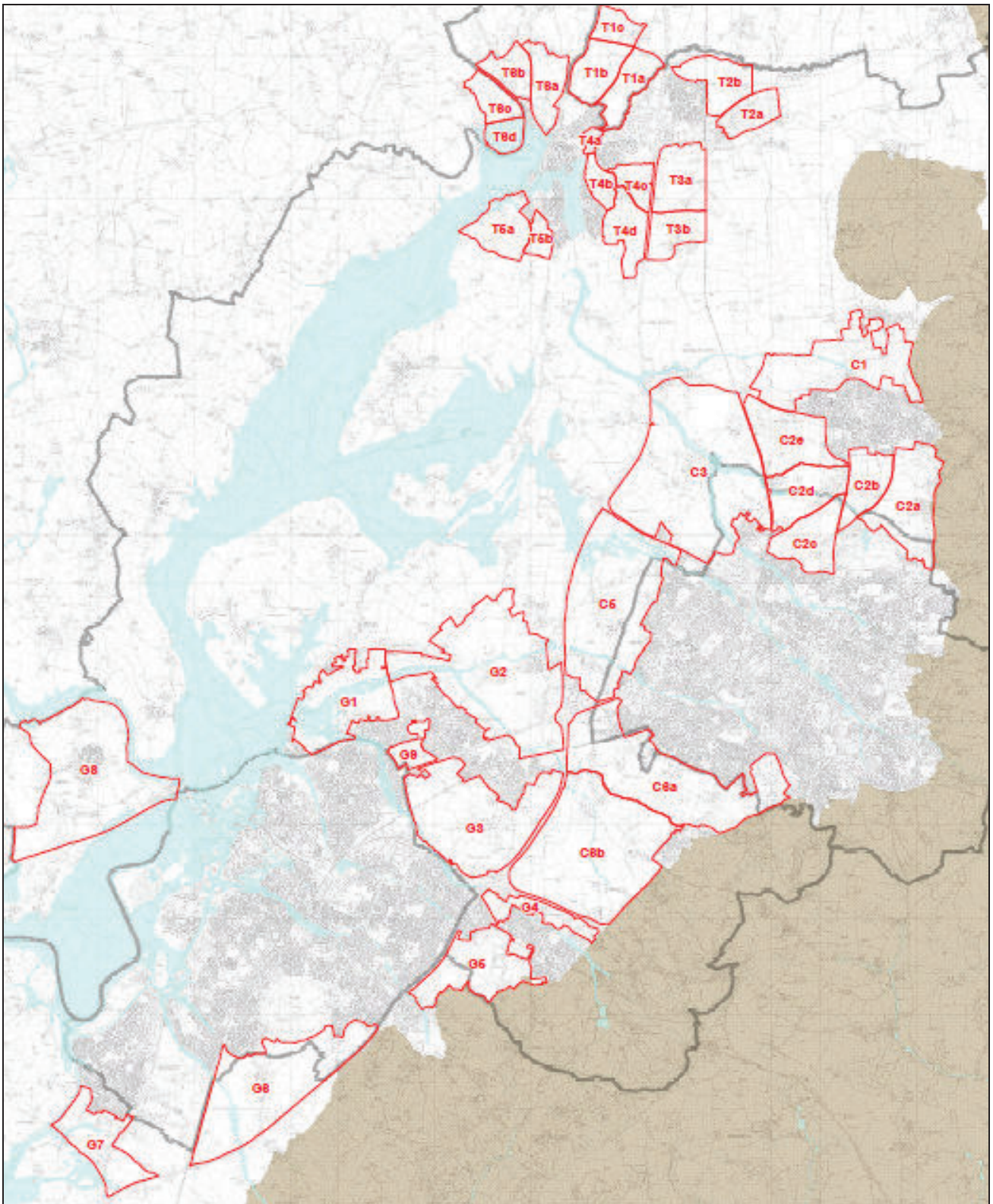


Table 8 – Summary of the sustainability appraisal of each of the broad locations.

Broad Location	Sustainability Appraisal Summary
G1 Land North of Gloucester	<p>Scores highly against all the sustainability criteria apart from Flood Risk and Use of Resources, almost 50% of the area is Grade 1 agricultural land. Reducing the development area to land south of the area of flood risk is likely to greatly increase the sustainability rating of this broad location. Development of this site offers significant opportunities to improve natural habitats and enhance biodiversity and for this reason scores particularly highly against this objective. The initial determination of the landscape sensitivity of this site is of low quality and it is expected that the landscape character could be replaced or substituted. The area is well related to the Gloucester urban area and key facilities and services would be readily accessible.</p>
G2 Land North/North East of Gloucester	<p>Scores well in relation to flood risk and use of natural resources, and reasonably well in relation to biodiversity impact. This is a large site with varying habitat, much is mown grassland of either the airport or the golf course. The area scores poorly as regards landscape sensitivity. The location is located centrally within Gloucester and Cheltenham and offers good access to existing highway infrastructure. It is also centrally located between the two main areas of population and employment and has the opportunity in the long term to provide a sustainable location for development opportunities. The area does, however, provide a visual gap between the two settlements of Gloucester and Cheltenham.</p>
G3 Land North East of Gloucester	<p>Scored reasonably well against most sustainability objectives, apart from landscape sensitivity. The area, which has the influential landscape form of Churchdown Hill at its centre, is considered to be an important part of the wider green corridor creating a visual gap dividing the two large urban areas. The area is not well linked for residential purposes to an existing community although the north western sector of this site between the A40 Golden Valley and railway could provide an excellent employment opportunity with good highway infrastructure linkages. This broad location site is not considered suitable for large scale housing, but part of the site could be taken forward for consideration for some employment land use.</p>
G4 Land East of Gloucester	<p>Scored extremely well in relation to most of the sustainability objectives. Sympathetic development could result in significant biodiversity improvements. The site is largely unconstrained by flood risk, and although currently designated as greenbelt its landscape sensitivity has been assessed as low. The westernmost parcel of land is probably more appropriate for industrial use with potential for residential development on land to the south of the A417 and west of Brockworth Road. The site is well connected to existing employment and services/facilities, and is reasonably close to Gloucester city, with good transport connections. The results of this initial SA appraisal suggest that the site should be taken forward for further consideration as part of the JCS site search.</p>
G5 Land East of Gloucester at Brockworth	<p>This area scores well against the sustainability objectives. However, much of the area has already been developed or is already allocated for development. Part of this broad location lies outside the JCS area within Stroud, however this part of the area is considered to be less suitable for further development owing to poor highway infrastructure to and nature conservation constraints. For these reasons it is recommended that this site is removed from the broad location search.</p>

Broad Location	Sustainability Appraisal Summary
<p>G6 Land to the South of Gloucester at Brookthorpe with Whaddon</p>	<p>This broad location performed quite poorly against many of the sustainability objectives. G6 is subject to landscape designations owing to proximity of lower scarp slopes of Cotswolds AONB escarpment and presence of Robinswood Hill outlier which dominate the topography of this broad location. The biodiversity value of the area is not considered to be of high importance, although there could potentially be opportunities to enhance biodiversity.</p> <p>The area is not particularly suitable for employment development owing to poor highway infrastructure and relative remoteness from trunk roads. A major issue for any large scale development is that the area is subject to a number of significant access barriers that limit the availability of both private and public transport infrastructure. New infrastructure to access the site is also difficult to achieve and likely to be highly costly, particularly with regard to the crossing the mainline railway. This broad location is a long distance from the city centre for access to shops, services and facilities. Development of this area could have a detrimental impact on the strategic aim to create and sustain a vibrant community, and has the potential to increase inequalities especially for those without access to a private car, and would constitute a continuation of urban sprawl away from the main city centre.</p>
<p>G7 Land to the South of Gloucester at Hardwicke</p>	<p>Similar to the findings of the SA of G6. This broad location performs poorly against much of the sustainability criteria, particularly in relation to adverse impact on biodiversity value, accessibility to key services and facilities, and the need to ensure greater self containment of the main urban areas and protecting against urban sprawl. The area does not perform well in terms of sustainable transport, or connectivity with existing settlements. It did perform well in relation to the economic objectives as there are existing employment opportunities nearby and the area has good access to the motorway network, however current development is already causing pressure on the M5 Junction 12, large scale development at this broad location would exacerbate this situation</p>
<p>G8 Land to the West of Gloucester at Highnam</p>	<p>This area performed poorly against several of the SA objectives and did not score well against any of the objectives. While much of the area is unconstrained against flood risk, the flood zone lies to the east and south of the area which could have implications for access into this broad location area unless significant infrastructure is put in place to ensure new development does not become isolated following a flood event. This area performed particularly poorly against the objective to preserve the best and most versatile agricultural land; approximately 50% of the area is the highest classification, Grade 1. The broad location is remote and rural; large scale development would be expected to overwhelm the small settlement of Highnam. Accessibility would also be an issue and development at this broad location is expected to increase the use of the private car to access employment, education, and community services and facilities, unless significant investment into public transport and sustainable transport measures were made.</p>
<p>G9 Land to the South of Churchdown</p>	<p>The broad location is surrounded by urban development and is closest to the urban centre of Gloucester. Its development is likely to lead to greater self-containment of the urban area. There is a concern that development of the area could lead to the agglomeration of Innsworth and Churchdown with Gloucester, although this can be mitigated through careful masterplanning to provide green public space along the northern border of this broad location to help retain some separation between the settlements. The area is considered to be of low biodiversity value, but does contain an important green space which is allocated in the Tewkesbury Local Plan. The area is currently within the greenbelt and its landscape sensitivity is considered to be medium to high although the value of the landscape lies with providing a green amenity and visual divide between the city and the two villages, rather than a visual divide between the two major urban areas. If the site could be developed without encroaching on the designated important greenspace and masterplanned to retain some green and visual divide between the settlements, it may be one of the most sustainable peripheral broad locations.</p>

Broad Location	Sustainability Appraisal Summary
<p>C1 Land to the West and North of Bishop's Cleeve</p>	<p>This broad location is considered to be poor in terms of biodiversity value so performed well against biodiversity objectives compared to some of the other broad location sites. However it scored extremely poorly on most of the other sustainability objectives used within the broadbrush assessment. In particular, this location is not peripheral to Cheltenham and its distance from the main urban area is likely to increase the necessity to use the private car to access jobs and services.</p> <p>Development of this area (which forms the countryside fringe of Bishops Cleeve to the north), particularly large scale residential development, would be expected to increase the problem of the urban sprawl of Bishops Cleeve northwards and away from Cheltenham town centre, and is therefore not expected to increase levels of self containment and ensure the continued vitality and vibrancy of the main urban centres. Bishops Cleeve has seen tremendous residential growth in recent years. Services and facilities within this settlement are limited; any additional development is likely to put additional stress on current services in the village. For these reasons it is felt that parts of the other broad location areas are likely to perform much better against the sustainability objectives and would be more suitable to undergo more detailed assessment. It is recommended that this broad location area be removed from the JCS broad location search.</p>
<p>C2 Land between Cheltenham and Bishop's Cleeve</p> <p>At the earliest stages of appraisal it became apparent that this broad location site, had widely different opportunities and constraints, along with well defined boundaries such as roads, railway lines, and flood corridors. For this reason it was decided to split the site into five segments. Parts of this broad location area scored reasonably well against the sustainability criteria and should now be taken forward for further and more detailed sustainability appraisal, namely: southern most part of sub-area C2d and sub-area C2c.</p>	<p>C2a Land between the GW Railway and the AONB, performed particularly poorly in the sustainability assessment especially as regards landscape sensitivity, biodiversity value, likelihood to fragment important habitats and the need to protect rural settlements from urban sprawl. This sub-area is designated in the local plan as a special landscape area and lies adjacent to the AONB. Due to the openness of the area, scope for mitigation for any development would be difficult without detrimental effects on its overall character and value. The part of the site nearest the southern boundary of this site would be better related to Cheltenham; however this part of the site is constrained due to flood risk. In conclusion it is recommended that this sub-area of Broad Location C2 be removed from the JCS Broad Location Search.</p> <p>C2b Land between the GW Railway and the A435. Was found to have some biodiversity value, although generally poor biodiversity potential and moderate to high landscape sensitivity. Floodrisk is not considered to be a constraint but this sub area is considered to form an important strategic landscape buffer between Bishops Cleeve and Cheltenham. Most of the site is closer to Bishops Cleeve than Cheltenham and is therefore mainly remote from the main urban centre. The southernmost part of this sub-area is better connected and is also on the public transport corridor. In conclusion most of this site is unlikely to be considered one of the more sustainable locations within the JCS search and it is recommended that it be removed from the JCS broad location search.</p> <p>C2c Land to the West of Cheltenham Race Course, performed reasonably well against most of the sustainability objectives. It was considered to have a low biodiversity value compared to many of the other broad location areas, flood risk is not considered to represent a constraint in this sub area of C2. Generally the landscape value is of low amenity, historic or ecological value, although parts of the site have clear distant views to the Malverns and in part to the Cotswolds. It was considered to have a moderate landscape value, although parts of the area are clearly more sensitive than others. The northern boundary of this sub area is peripheral to Cheltenham and its range of services, facilities and employment opportunities. Any development in this part of the sub-area would be expected to have a positive impact on the objective to create and sustain a vibrant community which would support the existing town and city centres. In conclusion it is recommended that this sub-area be retained in the JCS Broad Location Search and undergo a more detailed sustainability appraisal.</p>

Broad Location	Sustainability Appraisal Summary
	<p>C2d Land between the mainline railway and the A435. Was found to have some good biodiversity value and potential. This site is partially constrained by floodzone and was considered to have an overall landscape sensitivity rating of moderate to high. Whilst the landscape is generally of low amenity with little ecological value, its location viewed from the AONB makes it fairly prominent and a key part of the green division between Bishops Cleeve and Cheltenham. However the southern most part of this sub-area is reasonably close to central Cheltenham and is close to the public transport corridor, therefore any development in this part of the sub area may be more sustainable in terms of accessibility to key facilities, services and employment sites. It is recommended therefore that the most southern part of this broad location (the part most peripheral to Cheltenham) be retained within the JCS search and undergo more detailed sustainability appraisal.</p> <p>C2e. This sub-area of C2 performed poorly against most of the sustainability objectives. The broad location includes a SSSI and BAP habitat close to Wingmore Farm landfill site. The north west quadrant of the broad location lies within a current landfill site which means a large part of this area cannot currently be developed, and it is expected that post landfill completion this part of the sub-area could have high biodiversity potential provided it is re-landscaped sympathetically. Whilst flooding is not considered to be a constraint, this area is remote from the main settlement of Cheltenham and its development is therefore not expected to support the existing town centre. Its development could unlock some identified needed facilities in nearby Bishops Cleeve, but would be more likely towards the continued urban sprawl of this village (which has already seen significant housing growth in recent years) westwards towards Brockhampton and increased commuting to the main centres. For these reasons it is recommended that this sub-area of Broad Location C2 cannot be considered to be one of the least sustainable locations.</p>
C3 Land to the North West of Cheltenham	<p>This broad location came out as average against most of the sustainability objectives. However it is a large broad location and the northernmost part of it is not well located or easily accessible. The area naturally splits into three by the flood zone. If this broad location was reduced in size through the removal of the northern section, this broad location would have scored extremely favourably against most of the sustainability objectives. Parts of this broad location, in particular land at Uckington and Swindon to the South East of this broad location, did not score well in the recent Green Belt Review; they were considered to perform no separation role between the urban areas. In conclusion parts of this broad location are likely to perform well against the sustainability objectives in particular reducing the need to travel by private car and helping to ensure the continued vitality and vibrancy of the main urban centres. These areas may perform well against the sustainability objectives and could be taken forward in the JCS process for a more in depth sustainability appraisal.</p>
C4 Land a distance to the West of Cheltenham incl. Boddington	<p>Was not assessed. This broad location was discounted as it is not close to any of the main urban centres. It is separated from Cheltenham by the M4. C4's southern boundary forms the northern boundary of Gloucester broad location area G2. The northern part of G2 scored poorly on sustainability appraisal.</p>
C5 Land to the West of Cheltenham	<p>The northern part of this broad location is heavily constrained by flood zone, therefore the northernmost part of this broad location is unlikely to be suitable for development. This broad location area performed well as regards accessibility and the transport network. The central eastern part of the broad location near Fiddlers Green/Hayden is situated within close proximity to Hayden Sewage Works, this is likely to make this part of the broad location negative for housing development but could still allow some high tech industrial use. However, opportunities should be sought to discuss with the water authority on both the long-term plans for the site at Hayden Sewage Works and whether the extent of the cordon sanitaire zone is correct. The southern and eastern parts of this broad location performed reasonably well, particularly against the employment potential objectives and opportunities to access Cheltenham by non-car modes, and notwithstanding constraints such as Green Belt, it is recommended that these parts of this broad location are taken forward for further consideration and more detailed appraisal in the JCS process.</p>

Broad Location	Sustainability Appraisal Summary
<p>C6 Land to the South of Cheltenham</p>	<p>This large broad location area was deemed to be important for biodiversity value and therefore scored relatively highly. Overall C6a displays a good mosaic of habitat types which could make mitigation difficult, however there could be opportunities to link habitats and create wildlife corridors. If all, or parts, of this broad location area were to be taken forward for further consideration within the JCS process a detailed environmental impact assessment would need to be undertaken to help assess the impact of various options on biodiversity. Flooding is not a constraint within this broad location area. Land closest to the north/north eastern boundary of this broad location area is most peripheral to the Cheltenham urban core. Land around Leckhampton is particularly well connected to the urban centre. Much of this broad location area, especially Eastern parts are close to a range of good community facilities, services and would be expected to have a positive contribution in regards helping to sustain a vibrant town centre. The central and southern areas of the broad location are however increasingly remote from Cheltenham. Whilst the landscape sensitivity (for those areas for which evidence has been gathered in this broad location) has been considered to be moderate to high, the proximity of parts of this broad location to the urban centre and connectivity to transport infrastructure, and the fact that flooding is not a constraint; would indicate that this broad location area be reduced in size and three segments should be taken forward for further appraisal to enable the environmental, social and economic impacts/opportunities to be assessed, namely segment of land near The Reddings defined as land between the A40 to the North, Badgeworth Lane to the West and the Rail line to the South; Segment of land South-east of the railway line around Up Hatherley on either side of Sunnfield Lane between Coldpool Lane and Chargrove Lane; and Land to the south-west of Leckhampton bounded to the north-west by the A46 Shurdington Road, to the West by Farm Lane, the North by Church Road and to the East by public greenspace and allotments.</p>
<p>T1 Land at Mitton (in Wychavon District)</p> <p>Recommended that most of this broad location area be discounted from the JCS search area, due to biodiversity, landscape and flooding constraints and accessibility issues. However given the proximity of the southern half of sub area T1a to existing residential and employment development and its relative proximity to Tewkesbury Town it is considered that this segment up to Mitton Lodge should be taken forward for further in depth sustainability appraisal.</p>	<p>T1a identified as lowland agricultural landscape in Worcestershire Biodiversity Action Plan. The area does not have any landscape constraints; the main constraint on this area is flooding along the Carrant Brook and across the southernmost sector. There is a likelihood of archaeological deposits along the Carrant Brook. The southern part of the area is reasonably well located adjacent to existing residential and employment development however the presence of an area of high flood risk is a constraint to further development in this location. The need for a Tewkesbury Northern Relief Road to reduce congestion and prevent problems with air quality in Tewkesbury Town is a further constraint towards bringing forward this area for development. The southern sector of this area is well located with regard to access to primary school and secondary school facilities (if short cut cycle/footways are used) but is not within reasonable walking distance of services and facilities in Tewkesbury Town. The area is not well served by public transport however there may be opportunities to enhance facilities for other sustainable modes of travel.</p> <p>Given the proximity of the southern half of the area to existing residential and employment development and its relative proximity to Tewkesbury Town it is recommended the southern part of the area up to Mitton Lodge should be taken forward for further in depth sustainability appraisal. The northern half of this sub area is considered to be too remote to be sustainable and its development would result in urban sprawl northwards into open countryside.</p> <p>T1b - The majority of this area lies within the River Avon floodplain and is the site of a SSSI. Development at this location would not relate well to the existing built form of Tewkesbury as it would result in urban sprawl into open countryside to the north of the town. The part of the area which is developable land; namely a thin strip adjacent to the B4080 is remote from the services and facilities found in Tewkesbury Town and the not well served by public transport. This area is therefore discounted as a broad location for further investigation as it does not perform well in sustainability appraisal.</p>

Broad Location	Sustainability Appraisal Summary
	<p>T1c – Is a northerly rural outlier with a recreational and tourist facility equidistant between Tewkesbury and the village of Bredon. The area has a SSSI and is remote from services and facilities found in either Tewkesbury or Northway/Ashchurch. The area is not well served by public transport and therefore is discounted as a broad location for further investigation as it does not perform well in sustainability appraisal. Development of this area would not relate well to the existing built form of Tewkesbury as it would result in urban sprawl into open countryside to the north of the town.</p>
<p>T2 Land to the East of Ashchurch</p> <p>It is recommended this site be taken forward for further consideration in the JCS broad location search. This broad location performed well against most of the sustainability objectives and is the only Tewkesbury broad location area which is not subject to major flood constraints. A large part of the site is brownfield, probably contaminated land, of little biodiversity value. Regenerating this area will have extremely important environmental benefits and will help reduce the loss of Greenfield land to development. The drawback is the distance of this site from the main town centre, the site would need to be carefully masterplanned to ensure essential community facilities and services are easily accessible, whilst also helping to ensure that the development will help support the town centre's continued vitality. Deliverability and cost of land remediation may also be an issue.</p>	<p>T2a - This area is not affected by flooding and has low biodiversity value. It is a large brown field site situated 3.5/4km distant from Tewkesbury town centre which provides a range of facilities and services including primary health care and a large supermarket. The area is located adjacent to Ashchurch for Tewkesbury Railway Station and adjacent to Ashchurch Industrial Estate employment area and has good access to the M5 motorway. Redevelopment of this site would involve costs associated with decontaminating the site which has a railway, many hectares of hard surfacing and possible sources of asbestos. Any sustainable redevelopment of this area will need to provide a range of community infrastructure including primary healthcare as well as a district/local centre. Redevelopment of the site would provide opportunities to enhance biodiversity and the landscape of the area. Owing to its brown field status and lack of biodiversity, despite its distance from Tewkesbury Town, it is considered that this broad location should be taken forward for further consideration with a more detailed sustainability appraisal to ascertain its suitability for redevelopment.</p> <p>T2b – The northern part of this area is subject to flooding associated with the Carrant Brook and the biodiversity value of the riparian edge is high. Also a high probability of significant archaeological deposits to south of Carrant Brook mirroring finds on Worcestershire side of the Brook. The north western sector of this area to the west of the railway would provide a natural extension to Northway in close proximity to primary school facilities. The area to the east of the railway is more isolated but still performs reasonably well as a green field site in close proximity to primary education and in close proximity to Ashchurch Industrial Estate employment area. Development of this site would benefit from any community and highway infrastructure that might be provided at T2a however T2b would integrate more easily into existing development and community facilities at Northway than any new development at T2a. Owing to its proximity to existing residential, employment and community facilities at Northway and accepting that the northern part of the site is at high risk of flooding with biodiversity and archaeological constraints, it is considered that this site should be taken forward for further consideration with a more detailed sustainability appraisal to ascertain its suitability for redevelopment.</p>

Broad Location	Sustainability Appraisal Summary
<p>T3 Land South of Ashchurch including Fiddington</p> <p>This broad location area scored reasonably well against most the sustainability objectives. However, the problem with this site is that the most sustainable northern part of this area in regards to accessibility and proximity to essential infrastructure, is severely constrained by flood zone, which runs across the whole of the northern edge of this broad location area. It is recommended that T3 be discounted from the JCS search area.</p>	<p>The north of T3a is well connected to highway infrastructure via A46 and M5 Junction 9, however this part of the broad location also suffers from flooding which has a considerable impact in the developable area. The area is not subject to any landscape or biodiversity designations. However, that does not mean to say it has no biodiversity value, if the area were to be taken forward for further analysis its would need a detailed biodiversity and landscape assessment. It is close to sources of employment however it is remote from services and facilities provided in Tewkesbury town centre. Access from the north of the site to Ashchurch primary school is good, however access to the secondary school is truncated by the M5 motorway. The southern areas of T3a are remote from services and facilities. Public transport to Tewkesbury and Northway is provided via the A46 corridor. The close proximity of the M5 may cause problems with relation noise pollution should any new development be located close to the motorway. It is considered that this area should be discounted as a broad location and should not be taken forward owing to the presence of an extensive flood zone to north of site along the Tirlle Brook which would effectively result in any new development being segregated from the existing built up area forming stand alone development in the open countryside. The further south any new development were located in the broad location the more remote it would become from existing services, facilities and public transport.</p> <p>T3b is remote from all services and facilities and is bounded to west by M5 motorway and to the east by mainline railway, the area is not served by public transport and is truncated by flooding. This area is not subject to any landscape or biodiversity designations. However, that does not mean to say it has no biodiversity value, if this area were to be taken forward for further analysis it would need a detailed biodiversity and landscape assessment, however it is discounted as a broad location and should not be taken forward because of its remoteness from existing services and facilities and the lack of access to public transport or ease of use of walking or cycling owing to its distance from the existing settlements of Tewkesbury of Northway.</p>
<p>T4 Land to the South East of Tewkesbury including Walton Cardiff</p> <p>It is recommended that the whole of this broad location be discounted from the JCS search area due to considerable flood constraints and poor accessibility concerns.</p>	<p>Owing to the high level of flood risk within this broad location, despite its relative proximity to Tewkesbury town centre with its associated service and facilities, areas T4a and T4b are discounted as broad locations for further consideration as suitable for future development</p> <p>T4c is located in close proximity to a primary and secondary school and areas of employment however it is not easily accessible and opportunities to improve its accessibility are very limited, it is therefore discounted as a broad location for further consideration.</p>
<p>T5 Land to the South West of Tewkesbury</p> <p>This broad location area is one of the few areas peripheral and easily accessible to Tewkesbury town centre which is not subject to major flood constraints, however this is countered by other significant constraints. However, it is considered that the small sub area of T5b</p>	<p>T4d is located furthest from Tewkesbury Town within this broad location and is also subject to flooding. Its development is considered unlikely to encourage sustainable modes of transport owing to its distance from services and facilities, therefore it is also discounted from further consideration as a location suitable for future development.</p> <p>T5a This broad location has good links to the SSSI of Severn Ham to the north and good green infrastructure links for wildlife to the Severn Ham & River Severn to the north and west. The whole area lies within a Landscape Protection Zone. The northern part of the broad location is subject to flooding, the whole area lies within the Battlefield register boundary and a large part of the area lies within a cordon sanitaire of a water treatment plant. Although the broad location is located in relative close proximity of the Tewkesbury Town centre the aforementioned constraints are significant enough to suggest that T5a should be discounted as an area of search for future development and accordingly it is recommended that this area should not be taken forward for further investigation.</p>

Broad Location	Sustainability Appraisal Summary
<p>that is developable would a) not enable a significant amount of development and b) could be considered to constitute ribbon development/urban sprawl and for these reasons it is recommended that the whole of T5 be discounted from further consideration in the JCS search.</p> <p>T6 Land to the North of Tewkesbury</p> <p>All of this broad location area performed poorly or average for all the sustainability objectives which were considered in this first broadbrush appraisal process. It is recommended that this broad location be removed from the JCS search area.</p>	<p>T5b – This area is also within the Battlefield register boundary, is subject to Landscape Protection Zone designation and the northern part of the broad location is subject to flooding, however it has good access to the A38 to the east and via the A38 Tewkesbury Relief Road to the M5 at Junction 9. The area lies adjacent to existing residential development to the north and on the eastern side of the A38 and is within walking distance of a primary school in York Road. A public transport corridor along the A38 provides access to Tewkesbury Town & Ashchurch to the north and to Gloucester and Cheltenham to the south. Despite these constraints the eastern section of this broad location south of the Gupshill Manor public house could perhaps be considered further and undergo more in depth appraisal in particular the landscape value of this part of the broad location area and its importance to the historical battlefield designation (bearing in mind that there is already some built development within the historical designated area).</p> <p>T6a – This broad location is subject to flooding from the River Avon along eastern boundary and although there are no SSSI's the seasonal flooding of the meadows adjacent to the River result in an area that is rich in biodiversity and regionally important for wading and over wintering species. The whole area lies within a Landscape Protection Zone. The southern part of the broad location lies in close proximity to Tewkesbury Town but does not enjoy good access to public transport services such that development would be generally dependent on car boum journeys. There are no schools or primary health care facilities within a 20 minute walk of the area and it does not lie in close proximity to areas of employment other than Tewkesbury Town Centre. The area would be relatively inaccessible from Junction 9 of the M5 motorway for employment purposes and any increased volume of traffic would require the completion of the Tewkesbury Relief Road. For the reasons described above it is recommended that this area is discounted from the study and not taken forward for further consideration</p> <p>T6b – The western half of this broad location is subject to flooding associated with the River Severn and the whole area lies within a Landscape Conservation Area. There are Key Wildlife Sites at Shuthonger Common and adjacent to River Severn along Mythe Brook. The area well served by the A38 along the eastern boundary however this route does not enjoy good access to public transport services such that development would be generally dependent on car boum journeys. There are no schools or primary health care facilities within a 20 minute walk and it does not lie in close proximity to areas of employment other than Tewkesbury Town Centre. The area is relatively inaccessible from Junction 9 of the M5 motorway for employment purposes and any increased volume of traffic would require the completion of the Tewkesbury Relief Road. For the reasons described above it is recommended that this area is discounted from the study and not taken forward for further consideration.</p> <p>T6c – This 100% green field site lies within the administrative area of Malvern Hills District Council and is totally floodplain associated with the River Severn. For this reason it is recommended that this area is discounted form the study and not taken forward for further consideration.</p> <p>T6d - This 100% green field site lies within the administrative area of Malvern Hills District Council and is totally floodplain associated with the River Severn. For this reason it is recommended that this area is discounted form the study and not taken forward for further consideration.</p>

3.4 Appraising the Scenarios

3.41 Concurrent with the work undertaken to identify broad locations for development peripheral to the urban areas was the development of a number of scenarios. These four scenarios implement the economically biased development strategy through four different alternative scenarios with varying levels of development. The scenarios use the most sustainable broad locations as the focus for a specified level of development and employing a residual residential development figure to be allocated as a result of the consultation. The main characteristics of the scenarios are given below:

3.42 Scenario A

This scenario focuses the majority of residential development on the existing urban areas of Gloucester, Cheltenham and Tewkesbury/Ashchurch with an additional 2400 homes to be delivered across the rural part of the JCS area over the plan period. To achieve this, only land already within the existing supply either as existing permissions, allocations or windfall development are taken into account.

3.43 Scenario B

In addition to the land already within the existing supply either as existing permissions, allocations or windfall development this scenario anticipates a further 13,200 dwellings being brought forward together with a minimum of circa 40ha of employment land. Within the rural areas, 2400 homes are to be delivered at a rate of 120 per annum over the plan period. In addition to this a further 3,700 homes will need to be delivered in unspecified locations. The rate of delivery under this scenario aims to meet the needs of 90% of the estimated population to 2031. This scenario anticipates a balanced rate of delivery throughout the JCS with development in the first ten years approximately equal to the development expected in the latter half of the plan period.

3.44 Scenario C

In addition to the land already within the existing supply either as existing permissions, allocations or windfall development this scenario anticipates a further 13,200 dwellings being brought forward together with a minimum circa 40ha of employment land. Within the rural areas, 2400 homes are to be delivered at a rate of 120 per annum over the plan period. In addition to this a further 7,400 homes will be delivered in unspecified locations. The rate of delivery under this scenario aims to meet the needs of 100% of the estimated population to 2031. This scenario anticipates a rate of delivery throughout the last ten years of the plan period equal to approximately 56% of the total development expected.

3.45 Scenario D

In addition to the land already within the existing supply either as existing permissions, allocations or windfall development this scenario anticipates a further 13,200 dwellings being brought forward together with minimum circa 40ha of employment land. Within the rural areas, 2400 homes are to be delivered at a rate of 120 per annum over the plan period. In addition to this a further 11,000 homes will be delivered in unspecified locations. The rate of delivery under this scenario aims to meet the needs of 110% of the estimated population to 2031. This scenario anticipates a rate of delivery of 60% of the overall development delivered in the latter half of the plan period.

- 3.46 An Initial SA of each of the scenarios has been carried out, the full results of which are shown in Appendix 5. Scenario C was assessed as being the most sustainable overall but Scenario A was found to have the lowest impacts on the environment and Scenario D to be the most socially sustainable. There are likely to be some 'significant effects' on the SACs within and bordering the JCS area according to the HRA screening opinion. There are a number of mitigation measures which would need to be taken to improve the sustainability of the scenarios. The majority of these are policy measures that could be written into the JCS as part of a suite of development management policies. Further work on these will be undertaken as part of the Preferred Options JCS in Summer 2012.
- 3.47 Limitations placed on development by Scenarios A and B may lead to an increase in long distance car borne commuting both into and out of the JCS area in the long term. Development within the broad locations offers opportunities to make best use of existing public transport links to the urban centres.
- 3.48 For all the scenarios there is potential for some loss of biodiversity due to redevelopment of long term brownfield land within the urban areas, however these impacts can generally be mitigated. In addition, there is some potential for increased development pressure on existing green corridors and green open spaces due to urban intensification which is less likely to accommodate wildlife into new development. Potential improvements to both biodiversity and access to green and open space are most likely to be achieved under Scenario B as the moderate level of development envisaged could be accommodated in such a way as to maintain or enhance existing levels. Impacts on the European sites within and adjacent to the JCS area are minimised under Scenario A and increase with the rising level of development envisaged under the subsequent scenarios with Scenario D the most likely to impact on them. Significant effects are most likely to arise from development within broad locations T2 and G1.
- 3.49 For all the scenarios the development envisaged within the broad locations could be accommodated within areas not affected by flooding and careful use of SUDs could mean that surface permeability is maintained. However, the eventual location of the residual development could make this more difficult to achieve.
- 3.410 Further detailed work is required in assessing the broad location options presented in the JC document as part of addressing the shortfall requirement but initial SA work has outlined that concentrating the residual development within the broad locations already put forward for development could have the effects of; increasing any landscape impacts, reducing the amount of green and open space that can be included within the developments, impacting negatively on biodiversity and would be likely to make the implementation of SUDs and the avoidance of any flood prone areas more problematic.
- 3.411 Worsening housing affordability is the key negative impact associated with Scenarios A and B, and to some extent C. Despite early decreases made to the net newly arising need in affordable housing, it is likely that by the end of the plan period the JCS would need to be delivering a number of homes far in excess of the overall annual development target just to meet the need for affordable homes. Scenario D has the biggest impacts on the requirement for affordable homes as under this scenario significant decreases are anticipated in the net newly arising need in affordable housing in the first fifteen years of the plan period, overall the requirement for affordable housing will rise by a modest amount in both Gloucester City and Cheltenham Borough but is likely to fall by approximately a fifth across Tewkesbury Borough.

- 3.412 The ability of people to meet the cost even of an 'affordable rent' product is also likely to decrease over the plan period. Lack of affordability could also lead to stagnation in the housing market leading to increased under-occupation of homes by the growing lone over 60s households, possible increases in long distance commuting as people can no longer afford to live in the area, and impacts on the attractiveness of the area for employers.
- 3.413 Under Scenarios C and D the number of people able to afford to buy increases with approximately half of all people being able to afford a home by 2031. This will have positive impacts on ensuring that everyone has access to a decent home at a price they can afford. In addition the level of people able to meet the cost of both market rents and 'affordable rent' products remain approximately stable over the plan period under both these scenarios. Scenario D has the biggest impacts on
- 3.414 Development within the urban area under all scenarios is likely to result in a more dense urban fabric with a higher population density. This will make access to goods and services by walking, cycling and public transport a more viable option due to the shorter distances that need to be covered. Restrictions to the levels of development made by Scenario A mean that the level of developer contributions that can be secured towards improvements to services will be limited; in the long term this may lead to services declining due to lack of continuous investment. Development within the Broad Locations is of an order that the level of developer contributions that can be secured towards improvements to services is likely to secure the continuation of existing services and secure new services where required. With the exception of Broad Location C6, the levels of development envisaged at the broad locations would be likely to require enhanced healthcare facilities which could result in better access to healthcare for the surrounding populations. Under Scenarios B, C and D, Broad Location T2 could accommodate some additional development from the residential residual which may make the development more sustainable with regard to access to services.
- 3.415 In the early part of the plan period a degree of economic growth can be secured due to "spaceless" growth and accommodated through existing allocations and permissions. In the mid and latter half of the plan period, employment land will need to be provided within the broad locations. Under Scenarios B, C and D there may be a certain lag in the development of employment sites within the broad locations. This may mean that employment led development opportunities come forward within the urban areas but further inward investment and expansion of existing businesses is delayed for a short time. Under Scenario A the limitations placed on development land is likely to lead to restrictions on economic growth in both the B and non B class sectors in the latter half of the plan period and would be likely to lead to the JCS area becoming a less attractive place to for business to relocate, start up, or expand in. There may also be an associated reduction in skills, training and apprenticeships opportunities across the area as employers cannot expand or move to alternative premises more suitable for their requirements.
- 3.416 A large proportion of the economic growth over the plan period is predicted to be in the non B class sectors such as retail, tourism and construction. There are land requirements associated with these sectors that are unlikely to be met under the restricted development envisaged under Scenario A and it will be difficult to meet this requirement within the broad locations proposed for development if the residual requirement for residential development were also to be accommodated in these areas under Scenarios C and D.

3.5 Appraising the Phase 2 Options

- 3.51 The approach to be taken in distributing the residual development envisaged under Scenarios B, C and D forms a major part of the consultation on developing the preferred option. Three options have been developed for consultation: Maximising economic opportunities, Preventing the Coalescence of Gloucester and Cheltenham and Cheltenham and Bishops Cleeve and Making the Best use of Existing Infrastructure. These three options were subjected to an initial SA based primarily on the broad locations which were targeted for residual development. This is a preliminary SA as the level of development envisaged for each of the broad locations under each of the options has yet to be quantified. A summary of preliminary SA of the options is shown in Table 9.
- 3.52 The preliminary SA of the three options shows that Option 1 and Option 3 are broadly equal in sustainability terms. Option 2 scores less well than the other options in terms of sustainability primarily due to the inclusion of both Broad Location G8, which has significant levels of Grade 1 Agricultural land and the northern sector of Broad Location T3, which is liable to flooding. Option 2 also performs poorly in terms of public transport accessibility and the potential negative impacts on Cheltenham town centre of directing further development to Broad Location C1.

4.0 Next Stages of the Sustainability Appraisal Process

- 4.01 The consultation on 'Developing the Preferred Option' will give the JCS authorities a steer on the direction which the JCS will take particularly with regard to the level and location for new development. Once the preferred policy options for the Joint Core Strategy have been agreed, the social, economic and environmental effects of implementing these policies - and any other viable policy alternatives - can be predicted. These Predicted Significant Effects will be reported in the Draft Sustainability Appraisal Report at Preferred Options Stage.
- 4.02 Once the Predicted Significant Effects of implementing a policy option have been identified they then need to be subject to a Predicted Significant Effect Analysis to ascertain the Magnitude, Significance, Duration, Probability, Reversibility and the Potential for Cumulative Effects of the effect. Mitigation measures will then be outlined for any adverse effects of implementing the policy.
- 4.03 Finally, the Joint Core Strategy will be the subject of an Examination in Public presided over by a planning inspector. The inspector will consider the Joint Core Strategy and supporting documents, including the Sustainability Appraisal Report, and may advise that the Strategy be amended. Any amendments will also be subject to Sustainability Appraisal and the results will be recorded in a Final Sustainability Appraisal Report that will accompany the Joint Core Strategy as it is adopted.

Appendix 1: Relevant Plans, Policies and Programmes

INTERNATIONAL

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
Johannesburg Declaration on Sustainable Development 2002	The Johannesburg Declaration highlights present challenges, expresses a commitment to sustainable development, underscores the importance of multilateralism and emphasizes the need for implementation.	<ul style="list-style-type: none"> • Halve the proportion of people without access to drinking water and basic sanitation by 2015 • Develop a ten-year framework of sustainable consumption and production programmes 	<p>The JCS should produce sustainable patterns of development.</p> <p>The SA process seeks to ensure that adverse sustainability effects are minimised and opportunities for sustainable development are maximised.</p>
Rio Declaration on Environment and Development 1992	People have a right to development however they have a responsibility to safeguard the common environment. The Rio declaration states that the only way to have long-term economic progress is to link it with environmental protection.	<ul style="list-style-type: none"> • Precautionary approach to the environment • Environmental protection integral to development process • Develop national law regarding liability for the victims of pollution and other environmental damage. • Environmental policies should not be used as an unjustifiable means of restricting international trade. • Local communities have a vital role in environmental management and development and their participation should be encouraged in the achievement of sustainable development 	<p>The JCS needs to promote environmental protection as an integral part of future development.</p> <p>Local communities must be meaningfully involved in the production of the JCS and especially in environmental protection policies within it.</p> <p>Local communities must have access to all environmental evidence considered in the production of the JCS and be able to make a meaningful contribution to its SA.</p>
Kyoto Protocol (1997)	There is a need to limit greenhouse gases in order to reduce the threat of global warming that leads to climate change.	<ul style="list-style-type: none"> • The UK is committed to cutting its emissions to 12.5% below 1990 levels by 2012, and the European Union to an 8% reduction on 1990 levels by 2012. 	<p>The JCS should include policies that seek to reduce emissions and contribute to meeting the requirements of the protocol.</p> <p>The SA Framework should include an objective to reduce emissions and Decision Aiding Questions related to minimising consumption and renewable energy generation.</p>
Strategic Environmental Assessment (SEA) Directive (2001/42/EC)	European directive which requires an assessment to be made of the effect of certain plans and programmes on the environment. Key issues include biodiversity, health, soil, water, air quality, landscape, cultural heritage, climate, flora and fauna.	All Plans, Policies and Programmes that will have a significant effect on the environment must be subject to SEA.	<p>The JCS will be subject to SEA.</p> <p>The SA process will be designed to incorporate SEA and fully comply with the directive.</p>
EU Water Framework Directive (WFD) (2000/60/EC)	The WFD sets a framework for the long-term sustainable management of water resources. It establishes a river catchment structure for the management of all inland and coastal waters including groundwater.	All rivers must be of 'good' quality by 2015, although this has yet to be defined.	<p>Proposals which promote water quality in line with the Directive should be considered in the JCS.</p> <p>The SA Framework should include an objective on water quality.</p>

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
EU Directive on the Conservation of Wild Birds (79/409/EEC)	To help towards halting biodiversity decline by the year 2010 by protecting the natural bird species across the EU.	Conserve naturally occurring bird species and designate Special Protection Areas (SPA) around important habitats.	The JCS will be subject to Habitats Regulation Assessment on its potential effects on the Severn Estuary SPA.
EU Landfill Directive (99/31/EC)	The Directive introduces stringent technical requirements for the operation of landfills. It is intended to prevent or reduce the adverse effects of the landfill of waste on the environment, in particular on surface water, groundwater, soil, air and human health.	<ul style="list-style-type: none"> • By 2010 to reduce biodegradable municipal waste landfilled to 75% of that Produced in 1995. • By 2013 to reduce biodegradable municipal waste landfilled to 50% of that produced in 1995. • By 2020 to reduce biodegradable municipal waste landfilled to 35% of that produced in 1995. 	<p>The SA Framework should contain an overarching objective on biodiversity.</p> <p>The JCS should aim to include proposals that will assist in meeting the targets set in the directive.</p> <p>The SA Framework will include objectives on waste minimisation and decision aiding questions on minimisation, recycling and reuse.</p>
United Nations Framework Convention on Climate Change 2007	Countries should protect the world's climate.	<ul style="list-style-type: none"> • Countries should enact effective environmental legislation to control greenhouse gas emissions and should ensure the functioning of natural processes that can remove some of the gases from the atmosphere • Adopt national policies and take measures to limit emissions of greenhouse gases • Protect and improve forests and oceans, that act as sinks and reservoirs for greenhouse gases 	<p>The JCS should include policies that seek to reduce emissions and minimise the causes of climate change. The JCS should promote the development of carbon sinks.</p> <p>The SA Framework will include an objective to reduce emissions. Consideration will be given to an objective relating to carbon capture.</p>
Agenda 21 2002	To achieve a sustainable balance between consumption, population and the Earth's life-supporting capacity.	<ul style="list-style-type: none"> • Adopt national strategies for sustainable development. • To carry out environmental assessments before starting projects that carry the risk of adverse impacts 	The JCS needs to have sustainable development at its core. Assessments will be required if there are likely to be adverse effects on the environment.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
Convention on Biological Diversity 1992	The world's biological diversity is valuable for ecological, genetic, social, economic, scientific, educational, cultural, recreational and aesthetic reasons. The conservation and sustainable use of biological diversity are of critical importance to meet the food, health and other needs of the growing world population.	<ul style="list-style-type: none"> • Develop national strategies, plans or programmes for the conservation and sustainable use of biological diversity • Make conservation and sustainable use of biological diversity part of planning and policy making • Establish laws to protect threatened species, develop environmentally sound development around these areas • Use environmental impact assessment, with public participation, on projects that threaten biological diversity, in order to avoid or minimise damage 	<p>The JCS should promote biological diversity and should seek to avoid any detrimental effects on species and habitats.</p> <p>The SA Framework should include an objective on biodiversity.</p> <p>The JCS will be subject to Habitat Regulation Assessment where it is deemed to be likely to have an effect on a protected site.</p>
European Climate Change Programme 2000	To identify and develop all the necessary elements of an EU strategy to implement the Kyoto Protocol.	To ensure that member states meet Kyoto protocol targets.	The JCS should include policies that seek to reduce emissions and assist in meeting the targets set in the Kyoto Protocol.
EU Nitrates Directive 1991	To reduce and prevent water pollution caused or induced by nitrates from agricultural sources.	<ul style="list-style-type: none"> • Identify waters, either actually or potentially affected by nitrate pollution and designate all areas draining into such waters as vulnerable zones • Prepare action plans where pollution is likely 	The SA Framework should include an objective to minimise pollution from all sources.
EU Habitat Directive (EU Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (92/43/EEC)) 1992	To promote the maintenance of biodiversity, taking account of economic, social, cultural and regional requirements, this Directive makes a contribution to the general objective of sustainable development, whereas the maintenance of such biodiversity may in certain cases require the maintenance, or indeed the encouragement, of human activities.	<ul style="list-style-type: none"> • Designate special areas of conservation in order to create a coherent European ecological network according to a specified timetable • Allow the designation in exceptional cases of a site which has not been proposed by a member state but which the community considers essential for either the maintenance or the survival of a priority natural habitat type or a priority species • Appropriate assessment must be made of any plan or programme likely to have significant effect in the conservation objectives of a site which has been designated or is to be designated in the future • Planning and development policies should encourage the management of features of the landscape which are of major importance for wild flora and fauna 	The JCS' impact on all designated sites will be subject to HRA. If an adverse effect on a site is anticipated, an Appropriate assessment will be undertaken.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
<p>The EU Directive on Environmental Noise (COM(2000)468) 2002</p>	<p>To avoid, prevent or limit the effects, including annoyance, caused by exposure to environmental noise.</p>	<ul style="list-style-type: none"> • Create noise maps • Prepare action plans • Inform and consult residents 	<p>The SA Framework should include a decision aiding question on noise pollution and ensure the JCS would not create noise issues.</p>
<p>The Aarhus Convention 1998 EU Directive on public access to environmental information (2003/4/EC) 2003</p>	<p>The convention encourages effective public participation to increase the accountability and transparency of decision-making, also contributing to public awareness of environmental issues and support for the decisions taken.</p>	<ul style="list-style-type: none"> • Authorities must take decisions which may have a significant effect on the environment as well as on personal health and wellbeing. • In taking decisions authorities must ensure effective public participation. • Participation by associations, organisations, groups, in particular non-governmental organisations promoting environmental protection should be encouraged to increase public awareness of environmental decisions and to support the decisions taken. 	<p>The JCS and SA must be subject to rigorous consultation and the public must be able to make a meaningful and informed input to the process.</p> <p>All information relied upon by the SA and the JCS will be made publicly available.</p> <p>Consultation on both the JCS and the SA will be held throughout the process.</p>
<p>European Spatial Development Perspective 1999</p>	<p>To define at Union level policy objectives and general principles of spatial development to ensure the sustainable development of the European territory which respects its diversity?</p>	<ul style="list-style-type: none"> • Establish a polycentric and balanced urban system • Promote integrated transport and communications concepts. • Develop and conserve natural and cultural heritage • Implement cross border planning strategies, land-use plans, improved regional transport systems, sustainable development strategies in rural areas and programmes making use of the natural and cultural heritage. 	<p>The JCS should be mindful of cross-border and cross boundary planning strategies. The JCS should establish the inter-relationships of towns within the JCS area and consider their functional relationships with other centres.</p>

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
<p>EU Air Quality Framework Directive (Directive 96/62/EC) 1996</p> <p>Directive 99/30/EC (the first Air Quality Daughter Directive) sets ambient air limit values for nitrogen dioxide and oxides of nitrogen, sulphur dioxide, lead and particulate matter.</p> <p>Directive 2000/69/EC (the second Air Quality Daughter Directive) sets ambient air limit values for benzene and carbon monoxide.</p> <p>Directive 2002/3/EC (the third Air Quality Daughter Directive) sets ambient air limit values for ozone.</p>	<p>Sets out and EU wide system for setting binding air quality objectives for specific pollutants to protect human health and the environment.</p> <p>The first Air Quality Daughter Directive sets ambient air limit values for nitrogen dioxide and oxides of nitrogen, sulphur dioxide, lead and particulate matter.</p> <p>The second Air Quality Daughter Directive sets ambient air limit values for benzene and carbon monoxide.</p> <p>The third Air Quality Daughter Directive) sets ambient air limit values for ozone.</p>	<p>• Member States must put in place systems for assessing the quality of ambient air based upon common methods and criteria</p> <p>• Member States must maintain ambient air quality where it is good and improve in other cases, by means of plans and programmes for action.</p> <p>The daughter Directives set specific limit values for air quality.</p>	<p>The JCS should consider the maintenance or improvement of air quality.</p> <p>The SA Framework should include an objective on air quality. Potentially decision aiding questions could be used to consider specific air quality issues.</p>
<p>The European Employment Strategy 1997</p>	<p>Strategies for job creation and quality, a better balance between the demands of work and personal life.</p>	<p>• The creation of National Action Plans</p>	<p>The JCS should expand on policies in the RSS on job creation.</p> <p>The SA Framework should include an objective relating to employment and decision aiding questions on employment types.</p>
<p>EU Framework Directive on Waste (Directive 91/156/EEC) 1991</p>	<p>Reducing the amount of waste by recycling and re-use. Reuse of waste as a source of energy.</p>	<p>Member States must encourage the prevention or reduction of waste and its harmfulness by encouraging the development of clean technologies, technical product improvements and disposal techniques. In addition, they must encourage the recovery of waste (including its use as a source of energy) and prohibit uncontrolled dumping. An adequate network of disposal installations must be established in co-operation with other Member States, using the best available technology which does not entail excessive costs.</p>	<p>The JCS should consider policies that would reduce waste arisings. It should also consider the possibility of utilising waste as a means of power generation.</p> <p>The SA Framework should include an objective to reduce waste arisings and promote reuse and recycling.</p>

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
IUCN Red List of Threatened Species – A Global Species Assessment (1994)	The Red List is an objective global approach for evaluating the conservation status of plant and animal species.		The JCS will consider the potential impacts that future developments could have upon plant and animal species. The SA Framework should include an objective which will ensure that all designated areas for wildlife are protected, restored and enhanced.

NATIONAL

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
PPS1: Delivering Sustainable Development 2005	<p>PPS1 sets out the Government's overarching planning policies on the delivery of sustainable development through the planning system.</p> <ul style="list-style-type: none"> Development plans should ensure that sustainable development is pursued in an integrated manner, in line with the principles set out in the UK strategy. RPBs and LPAs should ensure that development plans promote outcomes in which environmental, economic and social objectives are achieved together over time. RPBs and LPAs should ensure that development plans contribute to global sustainability by addressing the causes and potential impacts of climate change. A spatial planning approach should be at the heart of planning for sustainable development. Planning policies should promote high quality inclusive design in the layout of new developments and individual buildings in terms of function and impact, not just for the short term but over the lifetime of the development. Design which fails to take the opportunities available for improving the character and quality of an area should not be accepted. Development plans should also contain clear, comprehensive and inclusive access policies - in terms of both location and external physical access. Such policies should consider people's diverse needs and aim to break down unnecessary barriers and exclusions in a manner that benefits the entire community. Community involvement is an essential element in delivering sustainable development and creating sustainable and safe communities. In developing the vision for their areas, planning authorities should ensure that communities are able to contribute to ideas about how that vision can be achieved, have the opportunity to participate in the process of drawing up the vision, strategy and specific plan policies, and to be involved in development proposals. 	<p>Planning and Climate Change sets out how spatial planning, in providing for the new homes, jobs and infrastructure needed by communities, should help shape places with lower carbon emissions and resilient to the climate change now accepted as inevitable.</p>	<p>The JCS should be based on the goal of achieving sustainable development and building successful communities.</p> <p>The SA Framework must include objectives that cover the full scope of sustainability (Social, Economic and Environmental) to ensure that the JCS minimises its potentially harmful effects and maximises positive outcomes.</p>
Planning and Climate Change Supplementary guidance to PPS1 2007	<p>Planning and Climate Change is a new-style PPS reflecting the expectations of the Government's Planning Green Paper, Planning – delivering a fundamental change.</p>	<p>Planning and Climate Change sets out how spatial planning, in providing for the new homes, jobs and infrastructure needed by communities, should help shape places with lower carbon emissions and resilient to the climate change now accepted as inevitable.</p>	<p>The JCS needs to both contribute to reducing the causes of climate change and be resilient to predicted climate change scenarios.</p> <p>The SA Framework should include an objective on reducing emissions and potentially an additional objective on adaptation.</p>

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
PPG2: Green Belts 2001	The fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open.	<ul style="list-style-type: none"> To check the unrestricted sprawl of large built-up areas To prevent neighbouring towns from merging into one another To assist in safeguarding the countryside from encroachment To preserve the setting and the special character of historic towns To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. 	<p>To achieve the housing figures set out in the RSS, the JCS will have to allow development within the Green Belt and establish new boundaries.</p> <p>The SA Framework should include an objective on the protection of landscape designations and will have decision aiding questions relating to the Green Belt.</p>
PPS3: Housing 2006	PPS 3 outlines a range of issues relating to the provision of housing. It provides guidance on planning the provision of new housing on a regional basis and on the allocation of land for housing by local authorities.	<ul style="list-style-type: none"> Provide everyone with the opportunity of a decent home. Offer a greater choice of housing in urban and rural areas. Promote sustainable patterns of development and make use of previously developed land (PDL). Promote urban renaissance and improve quality of life through well-designed new housing. 	<p>PPS3 call for all LPA to demonstrate a 5 year housing land supply. The JCS will have to make significant housing allocations in the form of urban extensions.</p> <p>The SA Framework will include an objective on housing and decision aiding questions on design, affordability and PDL.</p>
PPS4 – Planning for Sustainable Economic Development	Planning is key to maintaining a growing economy while respecting environmental limits. Economic growth creates wealth and is essential for the development of sustainable communities. Economic development should also be used to boost underperforming areas and reduce inequalities.	<ul style="list-style-type: none"> Raise the productivity of the UK Economy Maximise job opportunities for all Improve the economic performance of all English regions and reduce the gap in economic growth rates between regions Deliver sustainable development by promoting economic development within natural limits Build prosperous communities by improving the economic performance of cities, sub regions and local areas, promoting regeneration and tackling deprivation. 	<p>The JCS will look to PPS4 for direction in developing policies for employment and economic development.</p> <p>The SA framework will contain an employment objective and decision aiding questions on employment type, location and other issues such as skills and workforce development.</p>

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
<p>PPS 5: Planning for the Historic Environment 2010</p>	<p>The policy statement requires new development to preserve and enhance the character and appearance of the historic environment. Climate change is also a key consideration which should be considered. The policy statement also provides guidance as to what detail is required to be submitted alongside a planning application to prevent harm to heritage assets.</p>	<ul style="list-style-type: none"> • Protect and enhance the historic environment. • Mitigate, adapt to and the effects of climate change when making decisions relating to heritage assets to reduce carbon emissions and secure sustainable development. <p>Set out a positive, proactive strategy for the conservation and enjoyment of the historic environment.</p> <ul style="list-style-type: none"> • Presumption in favour of the conservation of designated heritage assets and designated heritage assets. 	<p>The JCS will refer to PPS5 for guidance in developing policies for the historic environment.</p> <p>The SA will contain an historic environment objective which will focus on whether any listed buildings or conservation areas are within or close to an area which could be considered for development.</p>
<p>PPS 6: Planning for Town Centres 2005</p>	<p>Seeks to promote the vitality and viability of town centres by ensuring that they are the focus for future growth.</p>	<p>LPA should apply the sequential test to all retail developments with a presumption towards town centre sites. Residential, office and leisure uses should also be encouraged towards existing centres to maintain and improve footfall.</p>	<p>The JCS will need to consider retail issues and establish the relationship between centres within the area.</p> <p>The SA Framework will include an objective to maintain and enhance town centre vitality.</p>
<p>PPS7: Sustainable Development in Rural Areas 2004</p>	<p>Sets the national planning framework for rural areas, including country towns and villages and the wider, largely undeveloped countryside up to the fringes of larger urban areas.</p>	<ul style="list-style-type: none"> • Thriving, inclusive and sustainable rural communities, ensuring people have decent places to live by improving the quality and sustainability of local environments and neighbourhoods. • Good quality, sustainable development that respects and, where possible, enhances local distinctiveness and the intrinsic qualities of the countryside. • Protection of the open countryside, with the highest level of protection for our most valued landscapes and environmental resources. • Promote more sustainable patterns of development. • Discourage greenfield development. • Promote sustainable and diverse agricultural development. 	<p>The JCS will have to contain policies that deal with the rural issues.</p> <p>The SA Framework should include an objective to protect and enhance the rural environment and decision aiding questions around the promotion of sustainable rural economies.</p>

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
<p>PPS9: Biodiversity and Geological Conservation</p>	<p>Sets out the Government's broad policy objectives in relation to biodiversity and geological conservation in England and its proposed planning policies for helping to deliver those objectives. PPS9 emphasises that the planning system has a significant part to play in meeting the Government's international commitments and domestic policies for habitats, species and ecosystems.</p>	<ul style="list-style-type: none"> • Development plan policies should be based upon up-to-date information about the environmental characteristics of their areas. • Plan policies should aim to maintain, and enhance, restore or add to biodiversity and geological conservation interests. • Plan policies on the form and location of development should take a strategic approach to the conservation, enhancement and restoration of biodiversity and geology, and recognise the contributions that sites, areas and features, both individually and in combination, make to conserving these resources. • Plan policies should promote opportunities for the incorporation of beneficial biodiversity geological and sit • Development proposals where the principal objective is to conserve or enhance biodiversity and geological conservation interests should be permitted. • Detrimental development should only be a cannot be located on less sensitive sites 	<p>The JCS must consider the potential effects on biodiversity and landscape when setting the policy framework for strategic development. The JCS should include policies that seek to preserve or enhance biodiversity and geodiversity.</p> <p>The SA framework should include an objective of biodiversity and geodiversity and additional decision aiding questions on local designations and locally important habitats and species.</p>
<p>PPS10: Planning For Sustainable Waste and Management, 2005 (DCLG)</p>	<p>Provides the government's national planning framework for waste management. PPS10 reflects DEFRA's Waste Strategy of 2000.</p>	<ul style="list-style-type: none"> • Promotes the waste hierarchy • See waste as a potential resource • Encourage community responsibility for waste • Implement the UK Waste Strategy 2000 • Ensure that the design and layout of new developments allows for recovery of waste and promotes hierarchy 	<p>The JCS will not directly deal with waste policy. However, the JCS can facilitate waste management and require new development to promote reduction, reuse and recycling.</p> <p>The SA Framework should include an objective to promote the waste hierarchy.</p>
<p>PPS12: Local Development Frameworks (Revised) 2008</p>	<p>Sets out the Government's policy for the preparation of Local Development Frameworks.</p>	<ul style="list-style-type: none"> • LDFs should contribute towards sustainable development • Emphasis on community consultation • All DPD to be accompanied by a Sustainability Appraisal 	<p>The JCS will sit within the LDF of each individual authority. The JCS will be progressed in accordance with the revised process set out in PPS12 (2008)</p> <p>An SA will accompany the JCS and will be progressed concurrently with the JCS.</p>

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
PPG13: Transport 2001	Local authorities should develop policies aimed at providing a safe, efficient and integrated transport system whilst contributing to the sustainability objective.	<ul style="list-style-type: none"> • Manage urban growth so that access is available by means other than the private car • Encourage housing in existing urban areas or other areas accessible by public transport • Use parking policy to promote sustainable transport modes. 	<p>The JCS should seek to locate new development in sustainable locations that are accessible by sustainable modes of transport.</p> <p>The SA Framework should contain an objective to minimise the length and frequency of journeys by car.</p>
PPG14: Planning Development on Unstable Land, 1990 (DCLG)	PPG14 explains the effects of instability on development and on land use. The responsibilities of the various parties to development and the need for instability to be taken into account in the planning process are emphasised. The manner in which instability might be treated in development plans and in considering applications for planning permission are outlined.	The primary aim is to ensure that development is suitable and that the physical constraints on the land are taken into account at all stages of the planning process	<p>The JCS should have regard to the policies of PPG14 and should encourage the remediation of unstable land.</p> <p>The SA Framework may include decision aiding questions on the remediation of land.</p>
PPG17: Planning for Open Space, Sport and Recreation 2002	Sets out the Government's policies with regard to the retention and provision of open space, sport, and recreation facilities.	Open space should be an integral part of development. It promotes healthy lifestyles and helps maintain high quality of life	<p>The JCS will consider PPG17.</p> <p>The SA framework will contain an objective on open space.</p>
PPS22: Renewable Energy 2004	PPS22 provides a statement of government policy concerning planning and development control of renewable energy developments. Increased development of renewable energy sources is vital to facilitating the delivery of the Government's commitments both climate change and renewable energy.	Reinforces national objective of cutting CO2 emissions by 60% by 2050, and generating 20% of electricity from renewable sources by 2020. Consider Gloucestershire's targets in Gloucestershire Renewable Energy Action Plan.	<p>The JCS should include policies that seek to reduce CO2 emissions and encourage the use of renewable energy generation.</p> <p>The SA Framework will include an Objective on minimising CO2 emissions and may include a separate objective on renewables.</p>
PPS23: Planning and Pollution Control 2004	PPS23 sets the Government's framework for dealing with planning and pollution control. It sets out a series of principles and approaches which should underpin planning for pollution.	<ul style="list-style-type: none"> • Put people at the centre; • Take a long-term perspective; • Take account of costs and benefits; • Respect environmental limits; • Apply the precautionary principle; • Use scientific knowledge; • Follow procedures which are based on transparency, access to information, stakeholder participation by stakeholders and access to justice; • Make the polluter pay. 	<p>The JCS will include policies that have an effect on pollution, air quality and contaminated land.</p> <p>The SA Framework will include an objective on pollution control and may include decision aiding questions on air quality, remediation of contaminated land and other pollution issues.</p>

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<p>PPG24: Planning and Noise 1994</p>	<p>Sets out the Government's policies with regard to planning and noise. Policies should seek to minimise the impact of noise creating activities, either by ensuring that noise sensitive developments are located away from existing sources of existing noise, or where its effects will not be an important consideration, or where there impacts can be minimised through mitigation methods.</p>	<p>Annex 1 contains a recommended range of each NEC (Noise Exposure Category) cover night-time periods.</p>	<p>The JCS will have to consider noise pollution and issues of bad neighbour uses.</p> <p>The SA Framework is likely to contain an objective on pollution and potentially a decision aiding question on noise pollution.</p>
<p>PPS25: Development and Flood-risk 2006</p>	<p>Sets out the Government's policies with regard to flooding and flood risk. Policies should aim to reduce the vulnerability of the country to the dangers and damage caused by unmanaged floods. This will contribute to the achievement of a better quality of life and the pursuit of sustainable development.</p>	<p>In identifying land for development local authorities should apply the 'precautionary principle' and follow a sequential approach to site selection. Local authorities should conduct Strategic Flood Risk Assessments to identify flood risk in their area.</p>	<p>The JCS will draw on evidence from the SFRA for Cheltenham, Gloucester and Tewkesbury. Development will be directed away from flood zone 3.</p> <p>The SA Framework will have an objective on flood risk.</p>
<p>Planning for Traveller Sites – Draft PPS (2011)</p>	<p>Requires the planning system to have a fair and consistent approach towards gypsies, travellers and travelling showpeople. The paper expresses interest to establish a 5 year housing supply for the travelling community to be comparable with housing policies for the settled communities.</p> <p>The draft PPS identifies the importance of providing sites for the travelling community to meet established local need to prevent the number of illegal encampments.</p>		<p>The JCS will establish a criteria based policy for gypsies, travellers and travelling showpeople. The policy will define areas where sites are more likely to be acceptable which would have least harm on existing landscapes, flood zones etc....</p> <p>The SA will identify physical and natural land constraints to establish if a site has the potential to be developed.</p>

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Circular 01/06: Planning for Gypsy and traveller caravan sites (ODPM)	The main purpose of the planning circular is to ensure that members of the gypsy and traveller communities should have the same rights and responsibilities as every other citizen. The circular also seeks to ensure that each person has the opportunity of living in a decent home in accordance with other housing criteria.	<ul style="list-style-type: none"> - To provide adequate pitches for gypsies and travellers where circular 1/94 had failed. - Create and sustain strong communities for the benefit of all members of society. - Improve access to health and education. - reduce the number of unauthorised encampments and reduce the number of enforcement cases. - To ensure that DPD's include fair, realistic and inclusive policies and to ensure that identified need is dealt with fairly and effectively. <p>To help to avoid gypsies and travellers becoming homeless through eviction of unauthorised sites without an alternative to move to.</p>	<p>The JCS will establish a criteria based policy for gypsies, travellers and travelling showpeople. The policy will define areas where sites are more likely to be acceptable which would have least harm on existing landscapes, flood zones etc....</p> <p>The SA will identify physical and natural land constraints to establish if a site has the potential to be developed.</p>
Circular 04/07: Planning for Travelling Showpeople. (ODPM)	This separate circular was produced because evidence shows that the advice set out in Circular 22/91 has failed to deliver adequate sites for travelling showpeople.	<p>The circular intends to:</p> <ul style="list-style-type: none"> - increase the number of travelling showpeople's sites; - to recognise, protect and facilitate the traditional way of life of travelling showpeople; - to underline the importance of assessing needs at regional and sub-regional level and for local authorities to develop strategies to ensure that needs are dealt with fairly and effectively. - to ensure that DPD's include fair and achievable policies and to ensure that identified need is dealt with fairly and effectively. - to help to avoid travelling showpeople becoming homeless through eviction from unauthorised sites without an alternative to move to. 	<p>The JCS will establish a criteria based policy for gypsies, travellers and travelling showpeople. The policy will define areas where sites are more likely to be acceptable which would have least harm on existing landscapes, flood zones etc....</p> <p>The SA will identify physical and natural land constraints to establish if a site has the potential to be developed.</p>

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<p>Draft National Planning Policy Framework (NPPF) (2011)</p>	<p>The consultation paper for the national planning policy framework looks to reform the planning system to make it less complex and more accessible, and to promote sustainable growth. The NPPF incorporates a radical streamlining of existing Planning Policy Statements, Planning Policy Guidance Notes and some circulars to form a single consolidated document.</p>	<p>Local Plans should set out strategic priorities to deliver:</p> <ul style="list-style-type: none"> - housing and economic development requirements. - the provision of retail, leisure and other commercial development. - The provision of infrastructure for transport, minerals, waste, energy, telecoms, water supply and water quality. - The provision of health, security, community infrastructure and other local facilities; and - Climate change mitigation and adaptation, protection and enhancement of the natural and historic environment, including landscape, and where relevant coastal management. 	<p>The JCS will draw on the policy framework within the NPPF and ensure that new strategies and policies reflect the guidance within this framework. The SA will identify objectives which reflect the policies and subject areas within the NPPF.</p>
<p>Welfare Reform Bill (2011)</p>	<p>The Bill introduces a wide range of reforms that will deliver the commitment made in the Coalition Agreement and the Queens Speech to make the benefits and tax credits systems fairer and simpler by:</p> <ul style="list-style-type: none"> - creating the right incentives to get more people into work by ensuring work always pays; - protecting the most vulnerable in our society; and - delivering fairness to those claiming benefit and to the taxpayer. 	<p>The main elements of the Bill are:</p> <ul style="list-style-type: none"> - the introduction of Universal Credit to provide a single streamlined benefit that will ensure work always pays; - a stronger approach to reducing fraud; - a new claimant commitment showing clearly what is expected of claimants; - reforms to Disability Living Allowance, through the introduction of the Personal Independence Payment to meet the needs of disabled people today; - creating a fairer approach to Housing Benefit to bring stability to the market; - driving out abuse of the Social Fund system by giving greater power to local authorities; - reforming Employment and Support Allowance to make the benefit fairer and to ensure that help goes to those with the greatest need; and - changes to support a new system of child support which puts the interest of the child first. 	<p>The JCS will reflect economic factors which will encourage and promote employment opportunities. The SA will assess through a number of objectives how development will help promote employment opportunities as well as improving existing service centres.</p>

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Rural White Paper (Our Countryside: The Future – A Fair Deal for Rural England) 2000	Sets out the Government's vision for rural areas. The White Paper's aim is to sustain and enhance the countryside.	<p>A living countryside</p> <ul style="list-style-type: none"> • A working countryside • A protected countryside • A vibrant countryside 	<p>The JCS and SA Framework should reflect the vision and objectives of the White Paper and encourage rural sustainability.</p> <p>The SA Framework will include decision aiding questions relating to rural sustainability under wider topic objectives relating to urban and rural areas.</p>
Urban White Paper (Our Towns and Cities, The Future: Delivering an Urban Renaissance) 1999	Sets out the Government's vision for towns, cities and suburbs which offer a high quality of life and opportunity for all.	<ul style="list-style-type: none"> • People shaping the future of their community. • Strong and representative local democracy. • People living in attractive, well kept towns and cities which use space and buildings well. • Promoting environmental sustainability through good design and planning which makes urban living practical and pleasant. • Towns and cities that create and share prosperity. • Good quality services that meet the needs businesses wherever they are. 	<p>The JCS and SA Framework should reflect the vision and objectives of the White Paper and encourage sustainability urban areas.</p> <p>The SA Framework will include decision aiding questions relating to urban sustainability under wider topic objectives relating to urban and rural areas.</p>
White Paper on Energy, (Meeting the Challenge) 2007	This White Paper sets out a framework for action to address the challenges facing the supply and demand for energy and helping to manage potential risks. The aim is to deliver energy security and accelerate the transition to a low carbon economy requires urgent and ambitious action at home and abroad.	<ul style="list-style-type: none"> • Save energy; • Develop cleaner energy supplies; and • Secure reliable energy supplies at prices set in competitive markets. • Strategy continues to be based on the principle that independently regulated, competitive energy markets, are the most cost-effective and efficient way of delivering our objectives. 	<p>The JCS needs to consider issues of infrastructure (including energy) supply. Its policies will need to facilitate a switch to carbon efficient energy generation and it should encourage the use of renewables.</p> <p>The SA Framework will include an objective on energy and decision aiding questions on its generation and the efficiency of its use.</p>

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Natural Environment White Paper (2011)	<p>The White Paper intends to rethink our relationship with nature and the way we value the benefits we get from it.</p> <p>The white paper will focus on climate change, the green economy and demographic change.</p>	<p>The white paper will mainstream the value of nature across our society by:</p> <ul style="list-style-type: none"> - facilitating greater local action to protect and improve nature; - creating a green economy, in which economic growth and the health of our natural resources sustain each other, and markets, business and Government better reflect the value of nature; - strengthening the connections between people and nature to the benefit of both; and - showing leadership in the EU and internationally to protect and enhance natural assets globally. 	<p>The JCS will ensure that policies and new developments will consider the natural environment and economic growth.</p> <p>The objectives of the SA will also reflect the requirements of the white paper.</p>
Strong and Prosperous Communities White Paper 2006	<p>The aim of this White Paper is to give local people and local communities more influence and power to improve their lives. It is about creating strong, prosperous communities and delivering better public services through a rebalancing of the relationship between central government, local government and local people.</p>	<p>There will be around 35 priorities for each local needs through Local Area Agreements many hundreds of indicators currently required by government there will be a single set of about 35 indicators covering all important national climate change, social exclusion and anti-social behaviour. This indicator set will include citizen satisfaction perception measures; and citizens and communities everywhere will be able to examine performance indicators to know how well their local area is doing.</p>	<p>The JCS will be heavily influenced by the Gloucestershire Local Area Agreement and should aim to achieve the targets it sets out.</p> <p>The SA Framework will be tested against the Local Area Agreement to ensure that all relevant targets are represented by either objectives or decision aiding questions.</p>
The Health Profile of England, 2006 Draft Guidance On Health In SEA, 2007	<p>Guidance on how to integrate health into SEA. The guidance is intended to help authorities assess the health effects of their plans and programmes more effectively and is based on current good practice</p>	<ul style="list-style-type: none"> • Encourages consultation with a health body in addition to 3 statutory consultees • SEA is a major opportunity to ensure that future policy encourages healthy lifestyles • SEA can ensure that policies damaging to healthy lifestyles are minimised and opportunities maximised. • Health organisations should be effectively engaged in SEA 	<p>The JCS should look to incorporate policies that promote healthy lifestyles. Health organisations will be given an opportunity to engage with policy preparation and the SA process.</p> <p>The SA Framework will include a health objective and decision aiding questions based on local health indicators. The PCT will be consulted on the Scoping Report.</p>
National Waste Strategy 2000 (England and Wales)	<p>The National Waste Strategy sets out the need for a change in thinking about waste. Landfill sites are running out and using landfill as a means of disposal is a missed opportunity. The Strategy is largely brought into the planning framework by PPS10.</p>	<ul style="list-style-type: none"> • Reducing landfill industrial and commercial waste to 85% of 1998 levels. • To recycle or compost at least: 30% of household waste by 2010 and 33% by 2015. • To reduce biodegradable municipal waste landfilled to 75% of that produced in 1995 by 2010, to 50% by 2013 and to 35% by 2020 • To recover value from 45% of municipal waste by 2010 and 67% by 2020 	<p>The JCS will not directly deal with waste policy. However, the JCS can facilitate waste management and require new development to promote reduction, reuse and recycling.</p> <p>The SA Framework should include an objective to promote the waste hierarchy.</p>

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Waste Strategy For England, 2007	The Waste Strategy for England, together with PPS10, implements the EC Waste Directive. The strategy's key message is that we are consuming resources at unsustainable levels and that this needs to be addressed by a variety of means such as reduction, reuse and recycling.	<ul style="list-style-type: none"> Decouple waste growth from economic growth. Emphasise prevention and re-use Meet and exceed the Landfill Directive diversion targets for biodegradable municipal waste Increase diversion from landfill of non-municipal waste Secure the investment in infrastructure needed to divert waste from landfill and for the management of hazardous waste Get the most environmental benefit from that investment, through increased recycling of resources and recovery of energy from residual waste. 	<p>The JCS will not directly deal with waste policy. However, the JCS can facilitate waste management and require new development to promote reduction, reuse and recycling.</p> <p>The SA Framework should include an objective to promote the waste hierarchy.</p>
UK Biodiversity Action Plan 1994	The UK BAP is the UK Government's response to the Convention on Biological Diversity signed in 1992.	The key targets and indicators are picked up in the Local Biodiversity Action Plan	See Gloucestershire BAP
Securing the Future: Delivering UK Sustainable Development Strategy, 2005	This document replaces 'A Better Quality of Life: A Strategy for Sustainable Development in the UK', published in 1999. It is a strategy for sustainable development, building on the 1999 publication.	<ul style="list-style-type: none"> Encouraging Sustainable Consumption and Production Contributing to Reducing Climate Change and Energy Consumption Natural Resource Protection and Environmental Enhancement Developing Sustainable Communities 	<p>Sustainable development should be at the heart of the JCS.</p> <p>The SA Framework should include objectives that cover the full range of objectives within the Sustainable Development Strategy.</p>
Quality of Life Counts 1999 – 2004 and 2004 update	Sets out the Government's core indicators for sustainable development.	Includes 147 core indicators relating to sustainable development, e.g. passenger travel by mode, distance travelled relative to income etc.	<p>The JCS should aim to achieve sustainable development.</p> <p>The SA Framework will include indicators derived from these core indicators.</p>
DTI Sustainability Strategy 2000	Sets out the DTI's priorities for contributing to sustainable development.	<ul style="list-style-type: none"> Improving resource productivity to reduce greenhouse gas emissions and waste generation by acting as a catalyst and driver. Encourage corporate social responsibility. Modernising the DTI to make it more sustainable. 	<p>The JCS should encourage economic growth across the JCS area but without detrimentally affecting the environment.</p> <p>The SA Framework will include objectives on corporate environmental responsibility.</p>
A New Deal for Transport White Paper, 1998	Sets the Government's objectives for integrated transport, aims to extend choice and mobility to support sustainable development.	<ul style="list-style-type: none"> Integration of different modes Facilitate a choice of modes Integrate transport policy with health and wealth creation. 	JCS should promote choice of transport modes and encourage fewer journeys by means of the private car.

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<p>Transport 2010; the Government's Ten Year Transport Plan, 2000-2010</p>	<p>Aims to deliver the Governments priorities with regard to transport. Sets out transport funding between 2001/02 and 2011/12.</p>	<ul style="list-style-type: none"> • Reduced congestion • Better integration between modes of transport • Improved choice, reliability, and safety through public transport. 	<p>The JCS should set the framework for future development that minimises the need to travel</p> <p>The SA Framework will include an objective on transport modes.</p>
<p>Our Health, Our Care, Our Say White Paper: A new direction for community services, 2006 (Department of Health)</p>	<p>Sets a new direction for the whole health and social care system. There will be a radical and sustained shift in the way in which services are delivered, ensuring that they are more personalised and that they fit into people's busy lives. People will be given a stronger voice so that they are the major drivers of service improvement.</p>	<ul style="list-style-type: none"> • People will be helped in their goal to remain healthy and independent. • People will have real choices and greater access in both health and social care. • Far more services will be delivered – safely and effectively – in the community or at home. • Services will be integrated, built round the needs of individuals and not service providers, promoting independence and choice. • Long-standing inequalities in access and care will be tackled. 	<p>The JCS should consider both healthcare and preventative health. Policies should seek to encourage healthy lifestyles by promoting walking, cycling and access to open space, sports and leisure facilities.</p> <p>The SA Framework will include an objective on health and decision aiding questions relating to healthy lifestyles and choices.</p> <p>The SA process will seek to incorporate Health Impact Assessment and the PCT will be added as a consultee.</p>
<p>Working with the Grain of Nature – A Biodiversity Strategy for England 2002</p>	<p>Seeks to ensure biodiversity considerations become embedded in all main sectors of public policy and sets out a programme for the next five years to make the changes necessary to conserve, enhance and work with the grain of nature and ecosystems.</p>	<ul style="list-style-type: none"> • Work with nature and ecosystems rather than against • Encourage community engagement with biodiversity and conservation • Develop and achieve BAP targets. 	<p>The JCS should seek to preserve or enhance biodiversity.</p> <p>The SA Framework will include an objective on biodiversity and potential decision aiding questions on priority species, habitats and land designations.</p>
<p>The Air Quality Strategy for England, Scotland, Wales and Northern Ireland, 2007 (DEFRA)</p>	<p>The Strategy provides a clear, long-term vision for improving air quality in the UK and offers options for further consideration to reduce the risk to health and the environment from air pollution.</p>	<ul style="list-style-type: none"> • The primary objective is to ensure that all citizens should have access to outdoor air without significant risk to their health, where this is economically and technically feasible. • The aim is to have a steady decrease in pollutants towards the objectives over the period of implementation. 	<p>The JCS should seek to reduce air pollution and improve air quality, especially where there are currently Air Quality Management Areas (AQMA) designated.</p> <p>The SA Framework will include an objective on pollution and decision aiding questions on air quality and AQMAs.</p>

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<p>A New Commitment to Neighbourhood Renewal; A National Strategy Action Plan 2001</p>	<p>Sets out the Government's vision for narrowing the gap between deprived neighbourhoods and the rest of the country, so that within 10 to 20 years, no-one should be seriously disadvantaged by where they live.</p>	<ul style="list-style-type: none"> • In all the poorest neighbourhoods, to have common goals of lower worklessness and crime, and better health, skills, housing and physical environment. • To narrow the gap on these measures between the most deprived neighbourhoods and the rest of the country. • 105 specific targets. 	<p>The JCS should seek to address inequalities between settlement and within settlements.</p> <p>The SA Framework will include an objective on inequality and decision aiding questions on worklessness, pay gaps and other quality of life issues.</p>
<p>Our Shared Future, 2007 (Commission On Integration and Cohesion)</p>	<p>Our Shared Future sets out our practical proposals for building integration and cohesion at a local level.</p>	<ul style="list-style-type: none"> • Sense of shared futures • Emphasis on a new model of rights and responsibilities • New emphasis on mutual respect and civility • Deliver a visible social justice 	<p>The JCS need to consider community cohesion and ensure that it promotes integrated communities.</p> <p>The SA Framework will include an objective on inequality and may include decision aiding questions on integration and cohesion.</p>
<p>The Countryside Agency, English Heritage, English Nature, Environment Agency - Environmental Quality in Spatial Planning 2005</p>	<p>Sets out the agencies' vision for the planning system and plans and strategies.</p>	<ul style="list-style-type: none"> • Improving and scoping the evidence base. • Plans and strategies should be visionary, ambitious, inclusive, connected and integrated. • Respecting the ability of the environment to accommodate change. • Plans and strategies should be objectives-led, spatially variable and prioritised. • Firm but flexible plans and strategies. • Facilitating locally distinctive and valued development. • Facilitating more sustainable development. • Plans and strategies that are rigorously tested. • Plans and strategies that are well delivered with high quality outcomes. • Plans and strategies that are adequately regularly reviewed. 	<p>The JCS should seek to address the requirements of the agencies; it will be based on a sound evidence base that will, in part, be provided by the SA. The SA will form a start point for the JCS.</p> <p>The SA Framework will be subject to consultation with the agencies – and their successors. The SA provides one of the testing procedures for the JCS and should be used to improve it where appropriate.</p>
<p>SEA and Climate Change: Guidance For Practitioners, Natural England, Environmental Agency et al, 2007</p>	<p>Suggests how climate change issues can be considered in SEA in England and Wales. It presents information on the causes and impacts of climate change and potential adaptation and mitigation measures.</p>	<p>No targets, objectives or indicators. This document provides practical guidance for undertaking SEA.</p>	<p>The JCS will be subject to SEA.</p> <p>The SA process will be designed to accommodate the requirements of SEA and the SA Framework will include climate change objectives.</p>

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<p>Groundwater Protection: Policy and Practice, Environment Agency 2006</p>	<p>The Environment Agency's core groundwater policy is: To protect and manage groundwater resources for present and future generations in ways that are appropriate for the risks that we identify.</p>	<ul style="list-style-type: none"> • To provide a framework for our statutory role – to ensure we use our powers in a consistent and transparent manner. • To encourage co-operation between ourselves and other bodies with statutory responsibilities for the protection of groundwater. These include national and local government, water companies, Natural England and the Countryside Council for Wales. • To promote our policies, so that land-users and potential developers may anticipate how we are likely to respond to a proposal or activity. • To influence the decisions of other organisations on issues we are concerned about but which we do not regulate. • To ensure that groundwater protection and management are consistent with our Vision for the environment and a sustainable future. • To provide vital information and background protection in England and Wales. 	<p>The JCS needs to consider groundwater protection and preserve the quality of water sources.</p> <p>The SA Framework will include an objective on water quality and may include decision aiding questions of groundwater quality and groundwater flooding.</p>

REGIONAL

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Regional Planning Guidance for the South West (RPG10 – Interim RSS) 2001	Provides the regional strategy within which local authority development plans and Local Transport Plans (LTPs) in the South West should be prepared. Sets out a broad development strategy for the period to 2016 and beyond and provides the spatial framework for other strategies and programmes.	<ul style="list-style-type: none"> • Improve economic and social opportunities in areas of special need. • Increase the % of new housing and employment at the PUAs. • Reduce long distance commuting • Improve health priority areas. 	The JCS should be written in the context of RPG10 but should be influenced by the emerging Regional Spatial Strategy, which will supercede it.
Draft Regional Spatial Strategy for the South West 2006 – 2026	Sets out the South West region proposed options for new development until 2026. Main focus on sustainability and focusing new development at Primary Urban Areas.	<ul style="list-style-type: none"> • Directs major development to a set of Strategically Significant Cities and Towns – including both Cheltenham and Gloucester. • Promotes sustainable development and patterns of development. • Promotes sustainable construction. • Provides areas of search for urban extensions to Cheltenham and Gloucester 	The JCS will be prepared in accordance with the emerging RSS once it has been adopted.
Draft Regional Spatial Strategy Panel Report, Government of the South West. [Examination in Public] Dated December 2007, published January 2008.	Sets out the panel's recommendation to the Secretary of State for amendments to the draft RSS. The report should consider comments made to the Examination in Public on the draft strategy.	The recommendations within the Panel Report have to be accepted by the Secretary of State before becoming part of the RSS.	The JCS will have to be in accordance with the RSS when it is adopted and must be prepared with regard to its various iterations, including the Panel Report.
Proposed Modifications to the Regional Spatial Strategy for the South West – published in July 2008	The Proposed Modifications to the RSS detail the Secretary of State's response to the Panel Report into the draft RSS.	<p>The Proposed Modifications increase the number of homes to be built within the JCS area to 56,000.</p> <p>The modifications also tone down the requirement for sustainable construction.</p>	The JCS will have to be developed within the context of the Proposed Modifications to the draft RSS and its policies should be in accordance with the RSS when published.
The Countryside Agency – The State of the Countryside in the South West 2003	Presents the latest information on the state of the countryside in the South West – highlighting the key issues for the rural areas within the Region and contrasting performance with that in the other English Regions.	No specific objectives but highlights the relatively poor state of SSSI in the JCS area and the need for 90% SSSI to be in either Good or Improving condition.	<p>The JCS will need to define a strategy for dealing with rural areas and should consider the condition of designated sites.</p> <p>The SA Framework will include an objective on the condition of designated sites and the need to achieve national targets.</p>

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English Heritage - A Strategy for the Historic Environment in the South West 2004	<p>English Heritage's vision for the strategy is: Our vision is of an historic environment that is widely recognised as one of the South West's key assets and strengths and is celebrated for its richness and diversity. It is an historic environment that makes a positive contribution to economic, social and environmental regeneration. It is conserved and enhanced both for our own benefit and that of future generations.</p>	No targets, Indicators or Objectives.	<p>The JCS will inevitably have an effect on the historic environment of the area.</p> <p>The SA Framework will include an objective on the historic environment and decision aiding questions relating to character and heritage.</p>
Severn Vale Catchment Abstraction Management Strategy (CAMS), Environment Agency 2008	<p>Water abstraction is the removal of water, (permanently or temporarily) from rivers, canals, reservoirs or underground strata. The main challenge in managing abstraction is to meet the needs of abstractors and other water users, while leaving water in the environment to conserve aquatic habitats, especially during low river flows.</p>	Sets abstraction licenses and limits to abstraction in terms of quantity and duration.	<p>The JCS will provide the strategic direction for future growth. This should consider water usage and the potential effect of increased abstraction on the Severn.</p> <p>The SA Framework will include an objective on water quality and resource management, including water usage.</p>
Groundwater Protection: Policy and Practice, Environment Agency 2006	<p>To protect and manage groundwater resources for present and future generations in ways that are appropriate for the risks that we identify.</p>	Need to work with others, such as developers, planners, other agencies and those working in industry and agriculture.	<p>The JCS will need to consider its impact on groundwater.</p> <p>The SA Framework will include an objective on water quality and potentially decision aiding questions of groundwater quality.</p>
SW Integrated Regional Strategy (IRS) (Nov '04) 'Now Connecting' (2005) – the Delivery Plan	<p>The Integrated Regional Strategy is an important mechanism for more integrated regional working providing a set of broad objectives and priorities relevant across sectors.</p>	<ul style="list-style-type: none"> To harness the benefits of population growth and manage the implications of population change. To enhance our distinctive environments and the quality and diversity of our cultural life To enhance our economic prosperity and quality of employment opportunity To address deprivation and disadvantage to reduce significant intra-regional inequalities 	<p>The JCS should provide a strategic direction for growth that balances economic, environmental and social factors and addresses key issues within its area.</p> <p>The SA Framework will contain a mix of economic, environmental and social objectives to assess the performance of the JCS in producing sustainable development.</p>
South West Biodiversity Implementation Plan 2004	<p>Provides a strategic framework for regional and local biodiversity partnerships in conserving biodiversity. It also helps raise awareness of the importance of biodiversity to the regions health, quality of life and economic productivity.</p>	<p>Repeats a number of the biodiversity targets set out in the RSS; including: Maintaining 40,000km of linear resource Maintaining the current 11,000 ha of wood pasture and parkland.</p>	<p>The JCS will need to consider its effect on biodiversity and should look to preserve or enhance it.</p> <p>The SA Framework will include an objective on biodiversity and potentially decision aiding questions of specific issues.</p>

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
South West Regional Economic Strategy 2006-2015 - SWRDA	<p>The Vision will be realised when the South West has developed an economy where:</p> <ul style="list-style-type: none"> • Prosperity is measured by wellbeing as well as economic wealth; • Knowledge, service quality and performance are key to business success; • More people can find jobs which fully utilise and reward their skills; and • The region respects the environment as the foundation of people's quality of life and as a business opportunity. 	<p>There are 3 headline objectives:</p> <ul style="list-style-type: none"> • Successful and competitive business • Strong and inclusive communities • An effective and confident region <p>Sub-objectives include:</p> <ul style="list-style-type: none"> • Reduced the number of adults in the workforce lacking NVQ2 or equivalent qualifications. • Improved income – house price ratios • Reduced journey times to major markets 	<p>The JCS will need to consider the need to provide sufficient employment land to meet future growth and ensure prosperity.</p> <p>The SA Framework will include a number of economic objectives on employment land provision and wealth creation. Decision aiding questions will be used to expand these objectives and reflect local economic conditions.</p>
'A Sustainable Future for the South West' - The Regional Sustainable Development Framework for the South West (2001)	<p>Provides a high level sustainable 'framework' for the south west. Includes a number of key principles and themes on topics such as health and well being, learning and skills, business and work etc.</p>	<p>The Framework has been designed to assist local authorities with sustainability appraisals and includes a number of objectives and indicators.</p>	<p>The SA process has drawn upon the objectives and indicators set out in the Regional Sustainable Development Framework.</p>
'Our Environment Our Future' Regional Strategy for the South West Environment, 2004-2014	<p>Provides the vision and aims for the environment of the south west in the future. It identifies pressures threatening the environment and key issues to be tackled. The purpose of the strategy is to:</p> <ul style="list-style-type: none"> • Generate awareness of the importance of the south west environment to people living in, working in and visiting the south west; • Identify priorities for protecting and enhancing the environment for the; benefit of current and future generations; • Ensure decisions are based on an understanding that social and economic activity must be undertaken within; and the carrying capacity of the region • Provide a framework for action 	<p>Includes a wide range of targets including:</p> <ul style="list-style-type: none"> • Increase the number of conservation areas with a conservation area appraisal to at least 29% (national average); • 100% of defined mountain, moor, heath and down and registered common land to be accessible to the public on foot by the end of 2005; • Increase the number of parish plans and village appraisals carried out; and • 11-15% of the region's generating capacity to come from renewable sources by 2010. 	<p>The JCS will need to consider the role of future development in decreasing the causes of climate change and adapting to its effects. The JCS should look to minimise the environmental impact of future growth.</p> <p>The SA Framework will include an objective on climate change and decision aiding questions relating to its causes and the adaptation to it.</p>
State of the South West Report 2004 – South West Observatory	<p>Provides a review of the region's economic, social, environmental and cultural life in 2004.</p>	<p>Establishes a number of detailed objectives and indicators relating to various issues including air quality, acid rain, climate change, biodiversity etc.</p>	<p>No specific relationship to JCS.</p> <p>The SA Framework will include objectives relating to all aspects of sustainable development.</p>
Regional Quality of Life Counts 2004 - DEFRA	<p>15 headline indicators providing information on social progress, economic growth and environmental protection for the region.</p>	<p>Sets out a number of headline indicators which may be used by local authorities.</p>	<p>The SA Framework will include a number of objectives relating to quality of life and decision aiding questions on local issues.</p>

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
<p>Sustainable Communities: Building the Future (Sustainable Communities Plan) South West Regional Plan 2003</p>	<p>Sets out policies for delivering 'sustainable communities' in the south west. The plan addresses:</p> <ul style="list-style-type: none"> • Housing; • Planning and neighbourhood renewal issues; and • Transport. 	<ul style="list-style-type: none"> • To ensure that all tenants have a decent home by 2010. • To improve conditions for vulnerable people living in private accommodation and that all tenants receive an excellent service from their landlord. • To ensure that all communities have a safe, clean, and attractive environment in which people can take pride. • To target areas of low demand and abandonment in order to create sustainable communities for the long-term. • To tackle housing shortages, by making the best use of stock, improving conditions for private house builders, and to address the need for affordable housing. • To ensure that whilst tackling these housing shortages, that urban sprawl is not created. • To alleviate pressures on services which have resulted from economic success. 	<p>The JCS needs to ensure that it maintains and creates sustainable communities and embraces the principles set out in Building the Future.</p> <p>The SA Framework will include objectives on sustainable communities, housing, community safety and access to local services with decision aiding questions relating to specific local issues.</p>
<p>Strategic Housing Priorities in the South West 2004 – Housing Corporation</p>	<p>Makes recommendations to Ministers on the priorities for the allocation of public sector housing capital.</p>	<p>No specific targets, indicators or objectives.</p>	<p>The JCS will need to consider housing provision.</p> <p>The SA Framework will include a housing objective.</p>
<p>Developing the Regional Transport Strategy 2004 – South West Regional Assembly</p>	<p>Used to guide decisions on investment and management in the transport network in the south west until it is replaced by the Regional Spatial Strategy.</p>	<p>Increase choice of transport modes and reduce the frequency and duration of journeys by private car.</p>	<p>The JCS will need to consider the effect of growth on transport patterns and facilitate choice.</p> <p>The SA framework will include an objective on transport modes.</p>
<p>Joining Up - Culture South West, 2004</p>	<p>Encourages increased participation in cultural activities across the South West, seeks to improve the quality and relevance of the regions cultural activities and aims to celebrate the regional identity and rich diversity of South West cultural life and tradition.</p>	<p>No specific targets, objectives or indicators.</p>	<p>The JCS should consider the effect of development on the area's cultural heritage.</p> <p>The SA Framework will include an objective on culture and heritage.</p>

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
Regional Renewable Energy Strategy for the South West of England (2003 – 2010) – South West Regional Development Agency	Sets out a strategy for the development of renewable energy resources within the SW Region. Identifies the problems of lack of planning policy on renewable energy development in regional, structure and local plans plus a lack of performance indicators relating to the provision of renewable energy.	11-15% of the region's generation capacity to come from renewable sources by 2010.	The JCS should encourage the use of renewable energy and promote renewable energy generation. The SA Framework will include a renewable energy objective and potentially decision aiding questions of microgeneration.
Warming to the idea - Meeting the challenge of climate change in the South West 2003 – South West Climate Change Impacts Partnership	Reports on the likely effects of climate change on the South West Region. It is based on a scoping study commissioned by a partnership of key regional stakeholders, the South West Climate Change Impacts Partnership (SWCCIP).	<ul style="list-style-type: none"> Describe the climate change scenarios projected for the South West in the coming century; Identify the likely impacts of such change; Suggest actions to respond to the challenges and opportunities presented by these impacts. 	The JCS should seek to reduce the causes of climate change but must also ensure that future development can adapt to the possible consequences of change. The SA Framework will include objectives on reduction and adaptation.
A Guide to Sustainable Tourism in the South West 2000 – Local Sustainability Group for the South West	Acknowledges the dependence the South West region has on tourism and the natural resource of the outstanding natural environment. Provides a sustainability checklist for local authorities to use when assessing new tourist developments in order to assess the impact of the proposal on the local and wider natural environment.	No specific targets, indicators or objectives.	The JCS should address the role of tourism within the local economy and will need to consider how this can be achieved sustainably. The SA Framework is likely to include decision aiding questions relating to tourism in the JCS area.
State of the Key Sectors Reports 2004 – South West Regional Development Agency	Looks at the state of the 8 of the most important or fastest growing economic sectors in the south west. These include: ICT, Advanced Engineering and Aerospace, Food and Drink, Tourism and Leisure, Marine Technology, Creative Industries, Biotech and Environmental Technology.	No specific targets but recommendations for Gloucestershire in each of the 8 key sectors.	The JCS will have to consider future economic growth and the need for jobs across the JCS area. It may look to focus specifically on key sectors. The SA Framework will include objectives on employment and the economy.
Creating Sustainable Communities In The South West 2005 - ODPM	Outlines much of the work being done to create sustainable communities in the South West.	<ul style="list-style-type: none"> Delivering a better balance between housing supply and demand; Ensuring people have decent places to live; Tackling disadvantage; Delivering better services through strong effective local government; and Promoting the development of the region 	Sustainable development should be at the heart of the JCS. The SA Framework should include objectives on the economy, environment and society.

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
<p>Regional Waste Strategy for the South West 'From Rubbish to Resource' 2004 – 2020 – South West Regional Assembly</p>	<p>Aims to ensure that by the year 2020 over 45% of waste is recycled and reused and less than 20% of waste produced in the region will be landfilled.</p>	<ul style="list-style-type: none"> • Reduce the amount of waste we all produce • Reuse as much as possible • Recycle • Recover as much value as we can from what is left • As a last resort: dispose of the left over waste as close as possible to where it is produced • Always look for solutions which give the best practicable outcome environmentally • Work together across geographic boundaries for more effective solutions to waste issues 	<p>Waste policy will largely be dealt with by the County Council's Waste Core Strategy. However, the JCS should encourage waste minimisation and promote the waste hierarchy.</p> <p>The SA framework will include an objective on waste.</p>
<p>The Cultural Strategy for the South West 'In search of Chunky Dunsters' 2001 – Culture South West</p>	<p>By 2010 there will have been a major, measurable increase in the number of people who take part in, enjoy and value a range of enhanced cultural activities across the region.</p>	<ul style="list-style-type: none"> • Encourage increased access to and participation in cultural activities across the South West, capitalising on the latest developments in Information and Communications Technology. • Improve the quality and relevance of the region's cultural facilities and activities. • Support and help develop the South West's cultural and creative industries. • Celebrate our regional identity and the rich diversity of South West cultural life and traditions. 	<p>The JCS should address the individual character and culture of the JCS area and the individual towns within it.</p> <p>The SA framework will include an objective on culture and heritage and may use decision aiding questions that relate specifically to the culture of the JCS area or individual areas within it.</p>

SUB-REGIONAL AND COUNTY

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
<p>Severn Trent Water Resources Plan 2005 - 2010</p>	<p>Summarises the key issues that impact on the projected supply demand balance in the Severn Trent abstraction area.</p>	<ul style="list-style-type: none"> • Drought in 2003 • Abstraction reductions to deliver environmental benefit • Nitrates • Climate Change impacts 	<p>The JCS needs to be deliverable without harming water quality.</p> <p>The SA Framework will include a water quality objective.</p>
<p>Our Place: Our Future, the new Sustainable Community Strategy for Gloucestershire 2007-2017 Local Area Agreement (LAA) 2007/8</p>	<p>We want Gloucestershire to be a place where:</p> <ul style="list-style-type: none"> • the actions we all take today mean that Gloucestershire remains a great place to live and work, and • we do not compromise the quality of life for future generations 	<ul style="list-style-type: none"> • The future matters to us and our environment is central to our quality of life; • Our communities matter to us. People want to be safe, healthy and prosperous and get along with each other. They want to have a real say in issues; • Everyone matters. We must aim for good outcomes for all; • The places where people live have a huge effect on their quality of life. People want to live in clean and pleasant places where they can access the services they need; and • Our vibrant urban and rural economy supports a diverse society. Gloucestershire's continued prosperity depends on the right business environment and on people having the opportunity to develop their skills. 	<p>The JCS should reflect the spatial implications of the objectives of the three Councils' Sustainable Community Strategies and the wider Gloucestershire Strategy.</p> <p>The Local Area Agreement is a means of achieving the aims of the Sustainable Community Strategy and these aims should be considered by the JCS.</p> <p>The SA Framework will include objectives that relate to all aspects of sustainable communities.</p>
<p>Gloucestershire Structure Plan Second Alteration 1999 – 2011 – Gloucestershire County Council</p>	<p>Provides strategic planning guidance for the County focusing new development in the Principal Urban Areas. Covers the period 1991 to 2011</p>	<ul style="list-style-type: none"> • Maximising the use of brownfield sites; • Utilising the capacity identified by the joint working process on Greenfield sites well related to existing urban areas; and • Elsewhere in the County, to utilise the capacity identified by the joint working process on sites within or adjacent to towns and villages 	<p>The JCS and RSS will replace some elements of the Structure Plan. However, the JCS should have regard to earlier planning policy and strategy for the area.</p>

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Cotswolds AONB Management Plan 2008-2013 – Cotswolds Conservation Board	sets out a series of objectives for the AONB which the Board wishes to see achieved. These represent the Board's current view of what it considers are the most important management actions which should be pursued, and which also reflect the views and aspirations of a multiplicity of stakeholders with an interest in the AONB. Actions the Board intends to take to implement these policies throughout the five years of the plan are also included.	<ul style="list-style-type: none"> • Healthy lifestyle recreational opportunities for all - "an inspirational breathing space away from it all"; • Opportunities for climate change mitigation measures; • Water supplies for an extensive area of Southern England; • Locally produced food and wood products; and • Opportunities for renewable energy generation 	<p>The JCS will have to have regard to the AONB management Plan and should adhere to its principles. The JCS should look to maintain and enhance the AONB and its setting.</p> <p>The SA Framework will include an objective on landscape character and decision aiding questions on specific local issues.</p>
Air Quality Strategy for Gloucestershire, 2004 – Gloucestershire County Council	Provides an important framework for maintaining good air quality and improving upon poor air quality over the years ahead.	No specific targets, indicators or objectives.	The SA framework will include an objective on air quality and may include decision aiding questions relating to specific local issues.
Gloucestershire Sustainable Energy Strategy, 2007 – 2017	Aims to provide a comprehensive and systematic approach to meeting Gloucester's energy needs. The Strategy proposes the formation of a Gloucestershire Sustainable Energy Partnership (GSEP) to form a partnership combining the expertise and knowledge of organisations within the public, private, health and community sectors.	<ul style="list-style-type: none"> • Ensure that sustainable energy is incorporated into all development plans, policies and strategies for existing and new initiatives in Gloucestershire • Stimulate energy savings resulting in a significant reduction in energy use per £ of GDP in Gloucestershire • Reduce fuel poverty and its associated health problems in both urban and rural areas in Gloucestershire • This will be heavily reliant on co-operative effort between all the partners in GSEP and focussing funding from a wide range of sources • Stimulate the development of at least 5 new renewable energy projects that are fully acceptable to businesses, residents and planners in Gloucestershire. 	The JCS
Gloucestershire Landscape Character Assessment 2006 – Gloucestershire County Council	The purpose of the Gloucestershire Landscape Character Assessment is to observe, analyse, describe and classify these variations and distinctive patterns.	Comprises a landscape character assessment of the Severn Vale, the Upper Thames Valley area and the land on the northern fringe of the Cotswolds AONB within the Vale of Moreton and Vale of Evesham.	<p>The JCS should consider landscape character and must ensure that it is preserved.</p> <p>The SA Framework will include an objective on landscape character.</p>

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
Gloucestershire Waste Partnership Joint Strategy Statement, 2007	The overall aim therefore is to deliver effective communications campaigns to increase participation in waste minimisation, recycling and composting schemes.	<ul style="list-style-type: none"> • Increase collection of dry recyclables through kerbside, bring sites and HRCs to maximise diversion of materials; • Introduce kitchen (food) waste collection for composting; • Reduce residual waste capacity to compensate the reduction in volume produced; • Continue to provide composting capacity for green waste; and 	<p>The JCS should ensure that development is planned in such a way as to make the implementation of the strategy feasible.</p> <p>The SA Framework will include an objective on waste and decision aiding questions on the waste hierarchy.</p>
Gloucestershire Local Transport Plan (2) (LTP2) 2006-2011 – Gloucestershire County Council	The vision is 'To enable people in Gloucestershire to enjoy real choices of ways of travel where there are viable alternatives to the car and be provided with high quality access to services on a safe and efficient transport network.'	<ul style="list-style-type: none"> • Maintenance and improvement; • Economy and integration; • Safety; • Accessibility; • Real choices and awareness; and • Environment. 	<p>The JCS will have to consider the transport implications of future development and will need to show that required infrastructure will be in place.</p> <p>The SA Framework will include an objective on transport.</p>
Biodiversity Action Plan for Gloucestershire 2000 – Gloucestershire Wildlife Trust	The Gloucestershire BAP seeks to implement at a local level, the recommendations of the UK Biodiversity Action Plan. It is intended to focus resources to conserve and enhance biodiversity by taking account of national and local priorities. One of the functions of the BAP is to identify targets for species and habitats appropriate to the local area.	<p>The BAP includes a number of specific targets for different habitats and species.</p> <p>Specific BAP targets within the JCS area will be considered within the baseline data context of this scoping report.</p>	<p>The JCS should consider the requirements of the habitats and species set out in the BAP and should aim to maintain or enhance wider biodiversity.</p> <p>The SA Framework will include an objective on wider biodiversity and may include decision aiding questions relating to specific species and targets within the Gloucestershire BAP.</p>

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
<p>Local Agenda 21 Strategy for a Sustainable Gloucestershire 2001 – Gloucestershire County Council</p>	<p>Sets out a sustainability framework for Gloucestershire.</p>	<p>The strategy includes the following headline objectives:</p> <ul style="list-style-type: none"> • Create communities that give people the best possible access to housing, work, education and services with the least possible travel. • Promote the strengths of out local economy and encourage community enterprise to grow. • Improve wildlife habitats, historic and built environment and landscape. • Encourage renewable resources. Use fewer non-renewable resources and reduce waste. • Prevent pollution. • Identify and promote local character and culture. • Involve our community in decision-making and local action. • Help people to make the most of themselves through education, training and advice. • Help people to deal with problems which hold them back from a healthy and fulfilling life. • Help people to live free from the fear of crime and poverty. 	<p>The JCS should consider renewable energy generation within all new development. The JCS will focus on long-term development and is unlikely to be able to contribute to the targets set out in the action plan.</p> <p>The SA Framework will include an objective on renewable energy and decision aiding questions of specific types of generation.</p>
<p>Gloucestershire Renewable Energy Action Plan 2005 – Gloucestershire Sustainable Energy Group</p>	<p>The Renewable Energy Action Plan aims to help facilitate the development of renewable energy schemes in the county to meet the Gloucestershire target of 40-50 mw of new renewable electricity generating capacity by 2010.</p>	<ul style="list-style-type: none"> • 5,500 new solar water heating system installations by 2010 (this represents roughly 2% of all existing houses in Gloucestershire) • 1000 ground source heat pumps powered by renewable electricity by 2010 (approx. 0.4% of all housing stock) • 5 MW of biomass heating by 2010 • To have a viable wood fuel supply business serving the county by 2010 	<p>The JCS should consider renewable energy generation within all new development. The JCS will focus on long-term development and is unlikely to be able to contribute to the targets set out in the action plan.</p> <p>The SA Framework will include an objective on renewable energy and decision aiding questions of specific types of generation.</p>

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
<p>"Health Gloucestershire" 2008 – 2018 – Gloucestershire's Health and Community Wellbeing Strategy – Gloucestershire primary Care Trust</p>	<p>Aims to improve the health and well-being of all those who live and work in Gloucestershire and to "level up" health outcomes by reducing health inequalities. The intention is to identify those sectors of the community that are experiencing particularly poor health or lack of well-being. It is then possible to focus coordinated and targeted action to address their specific needs, thus enabling them to improve their health outcomes to achieve the same as the countywide average.</p>	<ul style="list-style-type: none"> • Reduce the health inequalities gap; • Make healthier choices the easiest choice; • Support and enable people to improve their health and well-being; • Empower and mobilise local communities for health and well-being; • Lead by example through having a healthy and health promoting workforce. 	<p>The JCS should consider promoting healthy lifestyles and reducing health inequalities.</p> <p>The SA Framework will include a health objective and may include decision aiding questions relating to specific health issues and inequalities within the JCS area.</p>
<p>The Gloucestershire Economic Strategy 2003-2014 – Gloucestershire First</p>	<p>The vision is to facilitate 'a high value-added economy with a balance between sectors, a wide geographical spread of wealth and a highly skilled and motivated workforce living in sustainable and socially inclusive communities in a quality environment.'</p>	<p>The Strategy includes the following 3 headline objectives:</p> <ul style="list-style-type: none"> • To address known deficiencies and short-term problems facing the County • To identify the longer term economic programme that will help achieve the vision for Gloucestershire • To build on our strengths <p>The Strategy also contains the following 3 broad over-riding themes:</p> <ul style="list-style-type: none"> • The need to address social exclusion and equality of opportunity • The desire for a more sustainable approach to development • The need to encourage innovation • The importance of added value • The need for a pragmatic approach to environmental protection • The value of partnership working -The Strategy recognises the importance of partnerships and seeks to coordinate their projects to secure maximum value. 	<p>The JCS should address the long term aspirations of the Economic Strategy and needs to be able to accommodate its requirements. The JCS should provide the planning framework within which the economy of the area can develop, while ensuring that this is achieved without compromising sustainability.</p> <p>The SA Framework will include economic objectives and will include decision aiding questions on specific economic issues within the JCS area. The Framework will also include objectives on the environment and climate change, which should ensure that environmental sustainability, is not over-shadowed by the need for economic growth.</p>

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
<p>Gloucestershire Urban Economic Strategy 2008 -2015 – Gloucestershire First</p>	<p>By 2015 to realise the economic potential that will derive from partnership and collaboration and by maximising the complementary nature of its various components whilst retaining their individual uniqueness.</p>	<ul style="list-style-type: none"> • To create and sustain successful and competitive businesses that can take advantage of urban Gloucestershire's strength to compete globally, nationally and regionally. • To deliver strong social cohesion in urban Gloucestershire in which the maximum number possible contribute to and benefit from the economy. • To provide a quality of life in urban Gloucestershire that attracts and retains a highly skilled and entrepreneurial workforce. • Deliver the Urban Economic Strategy in a sustainable manner and within a stable ecological footprint. • Provide strong, collaborative and consistent leadership that embraces the whole of urban Gloucestershire. • Install the connectivity that leads to a cohesive urban economy and enables it to benefit rural Gloucestershire effectively. 	<p>The JCS should consider the long term aspirations of the urban areas of Gloucester, Cheltenham and Tewkesbury. The JCS may also consider addressing inequality both between and within urban areas.</p> <p>The SA Framework will include economic indicators and is likely to include decision aiding questions relating to specific economic issues facing the JCS area's urban economies.</p>
<p>The Rural Economic Strategy for Gloucestershire 2007-2015 – Gloucestershire First</p>	<p>The aim of the strategy is to provide clear strategic objectives and priorities for the development of the Gloucestershire rural economy during the period 2007-2015. The vision for the strategy is that rural Gloucestershire will have an economy where the aspirations and skills of the people combine with the quality of the physical and cultural environment to provide a high quality of life and sustainable prosperity for everyone.</p>	<p>The Strategic Objectives of the strategy are as follows:</p> <ul style="list-style-type: none"> • To sustain and support the growth of successful and competitive businesses in Rural Gloucestershire • To increase economic inclusion in Rural Gloucestershire, particularly in the most deprived areas • To strengthen rural communities in Gloucestershire • To realise fully the economic potential of Gloucestershire's rural environment whilst protecting the exceptional quality of the countryside for future generations. <p>The primary objective of the Minerals Local Plan is for mineral extraction to be managed in a sustainable way.</p>	<p>The JCS should consider the long-term aspirations of the strategy for the rural areas of the JCS area. Consideration needs to be given to changes within the rural economy and the role of local employment in strengthening rural communities.</p> <p>The SA Framework will include economic objectives and is likely to include a specific objective relating to rural issues and decision aiding questions on the rural economy.</p>
<p>Gloucestershire Minerals Local Plan 2003 – Gloucestershire County Council</p>	<p>Provides the detailed policies to control and guide all future mineral development in the County.</p>	<p>Minerals policy is unlikely to be dealt within the JCS or SA Framework. Sustainable resource use should be promoted.</p>	<p>Minerals policy is unlikely to be dealt within the JCS or SA Framework. Sustainable resource use should be promoted.</p>

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
<p>Gloucestershire Waste Local Plan 2002 – 2012 – Gloucestershire County Council</p>	<p>The Gloucestershire Waste Local Plan sets out the land use planning framework for the development of waste management facilities in the county. The plan also considers the transportation of waste and specific sites for the storage, management and disposal of waste.</p>	<p>The plan includes a number of specific local targets including targets relating to recycling and composting, waste recovery and landfill reductions on biological content.</p>	<p>The JCS should consider waste policy and include policies that promote the waste hierarchy. The SA Framework will include an objective on waste.</p>

LOCAL AND DISTRICT

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
Tewkesbury Local Plan 2006 – Tewkesbury Borough Council	The Plan's overall vision for the Borough is to ensure that development within the area contributes positively to creating sustainable communities. This will be achieved by directing development to locations where the mix of uses and proximity to existing facilities minimises the increase in transport demand whilst maximising residents' choice for access to the range of destinations they use in their daily lives.	<ul style="list-style-type: none"> • Promote sustainable development; • To conserve and enhance the built and natural heritage of the Borough; • To stimulate an approach to new development which: i. Respects local environmental conditions in the detailed siting and design ii. Takes full account of local ecosystems and biodiversity iii. Encourages the use of renewable resources iv. Minimises unnecessary reliance on private transport v. emphasises the re-use of brownfield land in sustainable locations vi. Supports innovative design solutions consistent with sustainability objectives vii. Supports more efficient use of land and promotes mixed-use development; • To stimulate a healthy local economic base; and • To meet the needs of residents whilst enhancing their quality of life. 	The JCS will replace elements of all 3 constituent districts' Local Plans.
Cheltenham Local Plan Second Review, 1991 – 2011 (2006) – Cheltenham Borough Council	The Plan has been prepared within the context of the Gloucestershire Structure Plan Second Review and covers the period to 2011. It provides the local planning framework against which planning applications will be judged. The plan includes "Core Policies and Proposals" that set the strategy for future development of the Borough.	<p>The Plan is intended to perform four functions:</p> <ul style="list-style-type: none"> • To Develop the policies and proposals of the Structure Plan; • To develop a detailed basis for development control; • To provide a basis for co-ordinating development and other use of land; and • To bring local and detailed planning issues before the public. 	The JCS will replace elements of all 3 constituent districts' Local Plans.
Gloucester City Local Plan 1983 – Gloucester City Council	The Adopted Gloucester City Local Plan is now very old and outdated. The JCS is unlikely to be influenced by its policies.		

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
<p>Gloucester City Core Strategy Preferred Options 2006</p>	<p>Was to provide the strategic direction for future development within Gloucester City. Work ceased on the Core Strategy when the decision to undertake a joint Core Strategy was made in March 2008.</p>	<p>The Core Strategy contained the following vision: 'To create a fair, just and thriving community in Gloucester where no-one is disadvantaged and where economic, social and environmental well-being is promoted through careful management of new development and capitalising on the unique character and traditional urban form of this historic city'. The Strategy included 19 strategic objectives to achieve the vision.</p>	<p>The JCS has superseded work on the Core Strategy for Gloucester City. The JCS will replace elements of all 3 constituent districts' Local Plans.</p>
<p>Working Together – The Community Plan for Tewkesbury Borough (2005-2008) and Action Plan (2006-2008)</p>	<p>The aim is to highlight what is important to local people and identify how partner organisations can enhance community cohesion, by working together to plan and deliver service improvements. The Community Plan will be replaced by a Sustainable Community Strategy, which is due to be launched in Autumn 2008 by the Tewkesbury Local Strategic Partnership.</p>	<ul style="list-style-type: none"> • Work in partnership to address the needs of rural communities; • Address the needs of vulnerable people and minority groups; • Address the needs of older people, people with disabilities, children and young people through the support of independent living; • Through the reduction of public disorder and the fear of crime, help to create safer communities; • Target support at those communities in greatest need; • Engage with communities to promote community cohesion and encourage volunteering; • To promote education opportunities through basic skills. • Promote a safe and cared for environment through the promotion of recycling and minimisation of waste. • Work towards the delivery of a balanced housing market which meets private, social and affordable housing needs. • To promote a buoyant economy in the borough 	<p>The JCS should reflect the spatial implications of the 3 districts' Sustainable Community Strategies. In Tewkesbury the JCS is likely to rely on the forthcoming SCS but should also consider the aspirations of the Community Plan.</p>

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives	Implication for JCS and SA
<p>Cheltenham Sustainable Community Strategy: Our Cheltenham, Our Future, 2008–2011</p>	<p>The Strategy has been prepared by the Cheltenham Strategic Partnership, which brings together the key organisations and partnerships in the Borough. The strategy aims to fulfill the following vision for Cheltenham:</p> <p>“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”.</p>	<p>The Sustainable Community Strategy is underpinned by 3 principles:</p> <ul style="list-style-type: none"> • The principle of community engagement and participation; • The principle of tackling inequalities and promoting cohesion; and • The principle of tackling climate change <p>The Sustainable community strategy also contains a set of thematic ambitions to:</p> <ul style="list-style-type: none"> • Promote community safety; • Promote sustainable living; • Promote a strong and sustainable economy; • Build healthy communities and support older people; • Build stronger communities and support housing choice; • Focus on children and young people; • Invest in environmental quality; • Invest in travel and transport; and • Invest in arts and culture. 	<p>The JCS should reflect the spatial implications of the 3 districts' Sustainable Community Strategies.</p>
<p>Sustainable Community Strategy for Gloucester, 2008 - 2018</p>	<p>The Sustainable Community Strategy (SCS) for Gloucester was produced by the Gloucester Partnership. The SCS constitutes a long-term vision and action plan showing how local organisations will work together to improve the social, economic and environmental wellbeing of Gloucester.</p> <p>The SCS includes the following vision:</p> <p>'In 2018 we want Gloucester City to be a fair, just and thriving community where no-one is disadvantaged and where:</p> <ul style="list-style-type: none"> • A vibrant urban economy supports a diverse society; • Everyone is able to reach their full potential and feel part of the their community and the city; and • The environment is healthy and safe for all 	<p>The SCS includes the following key aims:</p> <ul style="list-style-type: none"> • Aim 1: A place where the future matters • Aim 2: A place where all communities matter and where people want to live • Aim 3: A place where all people matter and we 'narrow the gap' in health, poverty and social exclusion • Aim 4: A place that thrives 	<p>The JCS should reflect the spatial implications of the 3 districts' Sustainable Community Strategies.</p>

Appendix 2: Key Sustainability Issues

Key Environmental Sustainability Issues	Evidence and trends	Sustainability Consequences
Conservation Areas and Listed Buildings – significant conservation area coverage and high numbers of listed buildings	The JCS Area contains 34 conservation areas and over 5000 listed buildings. The majority of conservation areas have current appraisals but few have management plans.	The historic environment of the JCS area is one of its most important features, providing an important heritage and cultural resource. The individual character of conservation areas and settlement should be maintained and utilised to create distinctive identities for those areas. Management plans could assist in maintaining the individual character of Conservation areas.
Condition of SSSI – Neither Cheltenham or Tewkesbury are achieving the target for 95% of SSSI to be in either favourable or unfavourable but recovering	At present Cheltenham is only achieving 50% favourable or unfavourable but recovering, Tewkesbury is achieving 71% but Gloucester is hitting the target.	The condition of designated sites could have a major impact on the biodiversity and sustainability of wildlife habitats. The condition of other designated sites is largely unknown but the JCS should consider an overarching policy to maintain or enhance the quality and condition of all designated sites.
Land designated as AONB or Green Belt – plays an important role in protecting the unique setting and landscape character of Gloucester, Cheltenham and Tewkesbury	22% of Cheltenham Borough and 31% of Tewkesbury Borough is within the Cotswolds AONB. In addition, 16% of Cheltenham’s administrative area and 17% of Tewkesbury’s area is within the Green Belt. No land within the administrative area of Gloucester City is designated AONB or Green Belt.	The area of AONB and green belt within Cheltenham and Tewkesbury Boroughs is important for protecting the unique setting and landscape character of the JCS area. It also provides sites for wildlife and recreational opportunities. Loss of this land could adversely affect the character of the area, impact on its biodiversity and affect the quality of life of local people.
Flooding – there are significant risks from flooding, especially with changing climate.	Awaiting specific details from the Strategic Flood Risk Assessment for Gloucestershire. However, significant flood risk is known to affect large areas of the JCS area.	As the climate changes serious flooding is likely to become a more frequent event and the current 1 in 100 yr flood risk will occur more often. More concentrated periods of heavy rainfall will also increase pressure on existing drainage systems, which may not be able to cope with the increased level of surface water runoff
Adoption of Code for Sustainable Homes Level 4 – there are significant sustainability risks to accommodating the RSS’ housing figures, which could be ameliorated by adopting Code Level 4 as a minimum standard in new development.	At present there is little information available of the number of developments achieving Code Level 4. This data gap should be addressed through improved monitoring within council AMRs.	New developments should be built in ways that minimise their impact on the environment and ensure they are resilient to the effects of climate change. The adoption of the Code for Sustainable Homes and BREEAM standards could contribute to achieving this. Refurbishment projects also need to take account of these issues
Air Pollution – there are an increasing number of Air Quality Management Areas in the JCS Area.	The number of AQMAs within the JCS area has increased to 4 in 2007. The AQMA at Withybridge connected with junction 10 of the M5 is of particular concern as it is likely that the capacity if junction 10 will increase if the North West Urban Extension of Cheltenham is delivered in accordance with the RSS.	Air quality is vital to human health and biodiversity. It is important that air quality is either maintained or, where possible, improved. The JCS will have to address issues of air quality across the area and in particular within AQMAs.
Brownfield land – high take-up in both Gloucester and Cheltenham means that fewer sites available bringing pressures on garden areas, which potentially impacts on quality of life, opportunities for food growing, wildlife and flooding	The number of homes built on previously developed land has been high over recent years and there is significant pressure on remaining brownfield sites.	The majority of all development in Gloucester and Cheltenham has been occurring on Brownfield sites. The reduction in availability of such sites is leading to increasing pressures on garden areas and increasing densities of development, which may achieve smaller carbon footprints at the expense of residential amenity and biodiversity.

Key Economic Sustainability Issues	Evidence and trends	Potential Sustainability Consequences for JCS
Town Centre Hierarchy – dominance of Cheltenham as a retail centre over Gloucester and Tewkesbury	Retail rank evidence from 2006 shows that Cheltenham is ranked 23 rd of all retail centres in the UK, whilst Gloucester is ranked 89 th , and Tewkesbury 565 th . The dominance of Cheltenham has been consistent over many years.	Cheltenham has a consistently higher retail rank than its population would suggest, whilst Gloucester has a lower retail rank. It is important that the JCS adequately resolves issues of complementarity between the two centres to ensure that Gloucester City Centre benefits from enhanced vitality and viability. Tewkesbury, Bishops Cleeve, Winchcombe and other local centres should maintain and where necessary enhance their retail offer to serve local needs. The JCS should identify a retail hierarchy and establish the roles of individual centres.
Business Stock (per head of population) – significant differences between the authorities	Cheltenham has 36 businesses per 1000 population; Gloucester has 26 and Tewkesbury 39.	This evidence could indicate that Gloucester has a lack of smaller businesses, potentially due to a shortage of suitable premises for business start ups. This evidence would also suggest a higher degree of entrepreneurship in Cheltenham and Tewkesbury which could be indicative of higher economic confidence in those Boroughs.
Employment Land Provision – the need to ensure the provision of future employment land supply	Employment Land Reviews have found that Cheltenham requires 30 ha of employment land, Gloucester requires XX ha employment land and Tewkesbury requires 39 ha of employment land (up to 2026).	Failure to provide sufficient employment land will detrimentally affect the economy of the JCS area. An imbalance between the provision of housing and the provision of employment land could result in increased commuting to, from and within the JCS area.
Unemployment – rates of residents being unemployed for more than one year and claiming benefits	Evidence shows that a significantly higher percentage of unemployed residents in Cheltenham have been so for more than one year. Gloucester and Tewkesbury have considerably lower percentages and are near to the regional average.	There is a problem with long term unemployment in Cheltenham and the JCS may wish address this issue.
Education attainment – percentage of population attaining NVQ Level 4 and above	Cheltenham’s percentage of population with NVQ Level 4 and above is 44.3%, Gloucester 18.4% and Tewkesbury 40.4%.	Gloucester’s percentage is significantly below national and regional averages indicating potential lack of skills amongst its workforce. The JCS should consider addressing this issue by promoting skilled employment opportunities in the city.
Gross Weekly Pay – pay in Gloucester is significantly lower than in Cheltenham and Tewkesbury	In 2007 gross weekly pay in Cheltenham was £487, in Gloucester it was £407 and in Tewkesbury £466. This figure had increased in each of the local authority areas in the previous 3 years.	Pay in Gloucester is significantly lower than in the other two districts and this is an issue that the JCS may wish to address.
Car Ownership – percentage of the population owning no car, this figure is lower in Tewkesbury Borough than the other two authorities	The percentage of the population owning no car in 2001 was 23% in Cheltenham, 24% in Gloucester and 15% in Tewkesbury.	The lower figure for the percentage of the population owning no car in Tewkesbury reflects the rural nature of the Borough. This presents a challenge in terms of improving public transport provision in Tewkesbury Borough to reduce the reliance on the use of private motor vehicles.
Hotel Bedstock – number of hotel bed spaces available within the 3 local authority areas	In 2002 the hotel bedstock in Cheltenham was 2197, in Gloucester 1935 and in Tewkesbury 1886. This figure has fallen slightly for Cheltenham and Tewkesbury but has increased for Gloucester.	The figure for Gloucester hides a considerable lack of hotel bed spaces available in the city centre. The number of hotel bed spaces in Gloucester city centre ought to be increased to improve the choice of places to stay for tourists and improve the city centre as a tourist destination.

Key Social Sustainability Issues	Evidence and trends	Sustainability Consequences
<p>Population and Household Size – growing slowly across the JCS area with most of increase in working age population. Fewer children could mean a smaller workforce in future. Number of households increasing.</p>	<p>The population is increasing slowly, with most of the growth occurring in the working age population. Children are slowly reducing as a proportion of the population, although their levels are still above national averages; household size steadily decreasing.</p> <p>There are high percentages of 1 person households in Cheltenham and Gloucester.</p>	<p>Decreasing household sizes means more single person households will need to be accommodated. Pressure on existing housing could increase and more affordable housing will be needed. More employment opportunities will need to be created to accommodate the growth in the working age population, although fewer children mean that there is likely to be a smaller workforce in future, with an increasing number of pensioners. A greater working age population could have positive benefits in terms of disposable income if it is spent in the local economy</p>
<p>Affordability – house prices have risen dramatically and fewer affordable homes available. House price to income ratios are very high, especially in Cheltenham.</p>	<p>House prices doubled over 5 years, income levels have lagged well behind. The house price to income ration is over 7.5 across the JCS area, with Cheltenham’s highest at 8.8 in 2004.</p>	<p>Property prices have doubled in five years and the growing gap between salaries and house prices means that it is becoming increasingly difficult for people to move to or continue to live in the area. This could have consequences for the local economy as businesses may find it increasingly difficult to recruit staff. The lack of affordable housing could also lead to a greater daily in-migration of workers who have to live outside the area, which brings with it the associated problems of traffic congestion and its impact on climate change</p>
<p>Vacant Homes and Second Homes – a significant proportion of the JCS area’s housing stock is either vacant or used as a second home.</p>	<p>3574 dwellings are currently vacant in the JCS area. In addition, 1181 are currently used as second homes. This represents 3.5% of the total housing stock of the area.</p>	<p>Residential units that are vacant or used as second homes could provide a valuable resource if brought back into the market. The JCS should seek to encourage vacant homes back into the market and Councils may consider using their powers to take over the management of vacant units.</p>
<p>Social Deprivation Inequalities – there are significant variations in the level of deprivation between and within the urban areas covered by the JCS.</p>	<p>There are a number of Super Output Areas (SOA) suffering from multiple deprivation within the JCS area. Gloucester has the highest number of SOAs located within the 10% most deprived nationally (5), followed by Cheltenham (3). Tewkesbury does not have any.</p> <p>Gloucester also has the highest number of SOAs located within the top 25% most deprived nationally (17), followed by Cheltenham (10) and Tewkesbury (1). This show that Gloucester has generally more deprivation than the Boroughs but also that there are significant pockets of deprivation within otherwise affluent areas.</p>	<p>The Joint Core Strategy should develop policies that seek to reduce levels of multiple deprivation. The JCS should also seek to address the inequality between Gloucester and the Boroughs generally and between different SOAs within individual settlements.</p>
<p>Inequality in Labour Markets – differentials between the number of claimants receiving key benefits</p>	<p>Evidence shows that the number of residents claiming Disability Living Allowance, Incapacity Benefit/Severe Disablement Allowance and Job Seekers Allowance is consistently highest in Gloucester, followed by Cheltenham and then Tewkesbury.</p>	<p>There is a large inequality in the number of people claiming benefits within the different areas covered by the JCS. Evidence would indicate that Gloucester’s labour Market is weaker than those of Cheltenham and Tewkesbury. The JCS should look to address this inequality through encouraging employment within Gloucester and facilitating the growth of existing firms.</p>
<p>Healthy Lifestyles and Health Inequalities – differentials in the number of residents dying early as a consequence of key health problems is evident across the JCS area.</p>	<p>Evidence shows that at a local level the number of residents dying early as a consequence of key illnesses is notably higher in Gloucester than in Cheltenham and Tewkesbury.</p> <p>Early deaths can be minimised by the promotion of a healthy lifestyle.</p>	<p>The Joint Core Strategy should seek to reduce, where possible, the occurrence of early death from key health problems. For example in the case of heart disease and stroke, one of the key causes is poor lifestyle in terms of poor diet and lack of exercise. The JCS should seek to ensure the provision of open spaces, green infrastructure and sports facilities in</p>

Key Social Sustainability Issues	Evidence and trends	Sustainability Consequences
<p>Transport Choices – the need to encourage a move away from commuting by private car.</p>	<p>Tewkesbury and, to a lesser extent, Gloucester have a high percentage of commuting by private car.</p>	<p>order to promote more exercise.</p> <p>The RSS calls for dramatic increases in house building and employment creation throughout the JCS area and this is likely to increase commuting. The location of housing and employment will need to be carefully planned to minimise commuting and public transport infrastructure will need to be improved to facilitate journeys that are beyond easy walking and cycling distance. Walking and cycling should be encouraged and have an added health benefit.</p>
<p>Education Deprivation – inequalities both between and within urban areas.</p>	<p>Evidence shows that there are issues with regards education deprivation in the JCS area. Gloucester has two SOA's located within the top 10% most deprived, Tewkesbury has one and Cheltenham has none.</p> <p>Gloucester has four SOA's located within the top 25% most deprived, Cheltenham has two, and Tewkesbury has one.</p>	<p>Education deprivation is a key issue that the JCS should address. Educational opportunities should not be determined by place and inequalities should be lessened. Education is key in improving skills in the workforce and in growing the JCS area's economy. There is also a correlation between education and health in later life.</p>

Appendix 3: Sustainability Framework

Sustainability Objective	Decision Aiding Questions Will the Joint Core Strategy...	Indicators
<p>BIODIVERSITY</p> <p>1. Safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats.</p>	<ul style="list-style-type: none"> ▪ ▪ Ensure that all designated sites of wildlife or geological interest are protected, restored and enhanced? ▪ Promote the creation of new habitats and sites of wildlife interest? 	<ul style="list-style-type: none"> - Percentage of i) SSSI, ii) SAC, iii) SPA, iv) RIGS and v) Key Wildlife Sites land designated in a condition that is in favourable condition. - BAP Habitats - BAP Habitats - Number and Area of land designated as Local Nature Reserves - Percentage river length assessed as i) good ii) excellent biological quality
<p>CLIMATE CHANGE</p> <p>2. Reduce contribution to climate change and support households and businesses in reducing their carbon footprint</p>	<ul style="list-style-type: none"> ▪ ▪ Reduce dependency on fossil fuels? ▪ Reduce carbon emissions from new and existing buildings and increase energy efficiency? ▪ Ensure that sustainable construction principles and standards are integrated into all development schemes, aiming for the highest standards possible? ▪ Encourage retrofitting of sustainable construction measures to existing buildings? 	<ul style="list-style-type: none"> - Total domestic CO2 emissions - Total industrial and commercial CO2 emissions - Total road transport CO2 emissions - Total CO2 emissions - Megawatts of electricity from renewable sources - Developments meeting Code for Sustainable Homes levels - Annual gas sales – domestic - Annual gas sales – industrial - Annual electricity sales – domestic - Annual electricity sales – industrial - Daily domestic water use
<p>CLIMATE CHANGE</p> <p>3. Adapt to the consequences of climate change</p>	<ul style="list-style-type: none"> ▪ ▪ Ensure new and existing buildings, infrastructure and the environment are resilient to the effects of extreme weather events? ▪ Help people, businesses and the environment to adapt to the physical and social impacts of climate change? ▪ Ensure that appropriate Sustainable Urban Drainage systems are incorporated into new development? 	<ul style="list-style-type: none"> - Number/percentage properties at risk from flooding - Development incorporating Sustainable Drainage Systems - New development permitted against Environment Agency advice on flood risk
<p>FLOODING</p> <p>4. Manage and reduce flood risk and surface water run-off.</p>	<ul style="list-style-type: none"> ▪ ▪ Ensure flood risk is minimised? ▪ Ensure that surface water run-off is slowed and absorbed? ▪ Maximise water collection opportunities? ▪ Ensure that appropriate Sustainable Urban Drainage systems are incorporated into new development? 	<ul style="list-style-type: none"> - Major developments permitted against Environment Agency advice on flood risk - Development incorporating Sustainable Drainage Systems - Development including rainwater harvesting

Sustainability Objective	Decision Aiding Questions Will the Joint Core Strategy...	Indicators
<p>NATURAL ENVIRONMENT AND RESOURCES</p> <p>5. Protect and improve the quality of natural resources including soil, water and landscape.</p>	<ul style="list-style-type: none"> ▪ Improve the quality of water (both ground and river) ▪ Improve the quality of contaminated land? ▪ Protect and enhance the special character of the Cotswolds AONB and other designated landscapes? ▪ Protect and enhance landscape character? ▪ Ensure development is of high quality and locally distinctive? 	<ul style="list-style-type: none"> - Percentage of SSSI land designated in a condition that is in favourable condition. - Percentage river length assessed as i) good and ii) excellent biological quality - Percentage river length assessed as i) good and ii) excellent chemical quality - Percentage of major developments incorporating a landscape character assessment?
<p>NATURAL ENVIRONMENT AND RESOURCES</p> <p>6. Minimise the use of natural resources including soil, water and greenfield land through good design.</p>	<ul style="list-style-type: none"> ▪ Minimise loss of soils to development and improve soil quality? ▪ Ensure that water use is reduced and opportunities for water recycling are maximised? ▪ Encourage the redevelopment of previously developed land? ▪ Reduce the number of vacant and derelict buildings? ▪ Protect the individual setting of settlements 	<ul style="list-style-type: none"> - Percentage of new development built on brownfield land - Daily domestic water use - Vacant Homes - Area of land remediated - Area of Green Belt
<p>HISTORIC ENVIRONMENT</p> <p>7. Protect and enhance the area's distinctive historic environment.</p>	<ul style="list-style-type: none"> ▪ Protect and enhance the heritage and character of the area? ▪ Promote good design that enhances public realm and the surrounding built form? 	<ul style="list-style-type: none"> - Percentage of conservation areas with up-to-date character appraisals - Percentage of conservation areas with up-to-date management plans - Percentage of major developments incorporating a landscape character assessment? - Number of i) listed buildings of all grades, ii) registered historic parks and gardens, iii) registered battlefields and iv) scheduled ancient monuments - Number of i) listed buildings, ii) conservation areas, iii) ancient monuments, iv) registered battlefields and v) archaeological sites at risk - Number of planning applications granted against the advice of archaeology department - Number of locally indexed buildings
<p>SUSTAINABLE TRANSPORT</p> <p>8. Improve accessibility, maximise the use of sustainable modes of transport and reduce the need to travel by the private car.</p>	<ul style="list-style-type: none"> ▪ Reduce the frequency and duration of journeys by private car? ▪ Reduce the need to travel by improving access to services, jobs, leisure and amenities? ▪ Maximise opportunities for cycling, walking and public transport? ▪ Reduce the use of high carbon modes of transport? 	<ul style="list-style-type: none"> - Travel to work data: Commuting by private car. - Travel to work data: Working from home. - Travel to work data: Cycling, walking and public transport. - Number of Air Quality Management Areas - Total road transport Co2 emissions

Sustainability Objective	Decision Aiding Questions Will the Joint Core Strategy...	Indicators
WASTE AND POLLUTION 9. Minimise pollution and waste to landfill.	<ul style="list-style-type: none"> ▪ Minimise the volume of waste created during construction (including demolition waste)? ▪ Minimise waste created during occupation? ▪ Help to avoid the generation of excess waste? ▪ Maximise reuse, recycling and composting of waste? ▪ Dispose of waste in a sustainable manner? ▪ Reduce air pollution? ▪ Reduce light and noise pollution? 	<ul style="list-style-type: none"> - Domestic waste going to landfill, recycled and composted - Kg waste collected per capita - % household waste recycled - % household waste composted - % household waste going to landfill - Air Quality Management Areas - Total domestic CO2 emissions - Total industrial and commercial CO2 emissions - Total road transport CO2 emissions - Total CO2 emissions
THE ECONOMY 10. Ensure the availability of employment land and premises to encourage inward investment and support growth of existing businesses.	<ul style="list-style-type: none"> ▪ Enhance the local economy? ▪ Protect and enhance the vitality and viability of existing employment areas? ▪ Ensure the provision of adequate land and premises to meet the needs of existing and new businesses? ▪ Provide opportunities for new and existing businesses to develop in a sustainable way? 	<ul style="list-style-type: none"> - VAT registrations/deregistration - Income rank - Employment gained/lost - New firms as % of stock - Business stock per 1,000 population - % working population that is economically active - % unemployed people that have been claiming for more than a year
CITY AND TOWN CENTRES 11. Support the vitality and viability of city and town centres as retail, service, leisure and learning destinations	<ul style="list-style-type: none"> ▪ Support the vitality and viability of city and town centre as a retail, service, leisure and learning destination? ▪ Enhance the quality of the public realm? 	<ul style="list-style-type: none"> - CACI Retail Footprint - Retail ranking - Retail floorspace - Total estimated tourism spend - City Centre hotel bedstock figures - Residents that feel fairly safe or very safe outside after dark - Residents that feel fairly safe or very safe outside during the day
SUSTAINABLE COMMUNITIES 12. Reduce inequalities in wellbeing and opportunity	<ul style="list-style-type: none"> ▪ Help to reduce inequalities in wellbeing and opportunity? ▪ Enable everyone to participate in local decision making? ▪ Help people to feel positive about the area they live in? 	<ul style="list-style-type: none"> - Population living in most deprived Super Output Areas (Worst 10% and worst 25%) - Electoral vote - Percentage of people surveyed who feel that they can influence decisions affecting their local area - Green Flag Award Public open Space
SUSTAINABLE COMMUNITIES 13. Reduce crime and the fear of crime	<ul style="list-style-type: none"> ▪ Reduce opportunities for crime? ▪ Make people feel safer through good design? ▪ Reduce actual levels of crime and fear of crime? ▪ Reduce anti-social behaviour? 	<ul style="list-style-type: none"> - Crime rates: Violent, Vehicle, Burglary, Racially Motivated and Drug Offences. - Residents that feel fairly safe or very safe outside in daylight/dark. - Number of ASBOs
HEALTH 14. Improve access to health facilities and promote healthy lifestyles	<ul style="list-style-type: none"> ▪ Help people to live healthy lifestyles? ▪ Ensure access to open and green spaces? ▪ Ensure access to local health facilities? ▪ Reduce health inequalities? 	<ul style="list-style-type: none"> - Early deaths from i) heart disease and Stroke, ii) Smoking and iii) Cancer - Limiting illnesses - General health good/fairly good

Sustainability Objective	Decision Aiding Questions Will the Joint Core Strategy...	Indicators
HOUSING 15. Ensure everyone has access to a decent home that they can afford and meets their needs.	<ul style="list-style-type: none"> ▪ Provide enough homes that people can afford? ▪ Provide quality and flexible homes that meet people's needs? ▪ Ensure that best use is made of the existing housing stock? 	<ul style="list-style-type: none"> - Housing stock - Total number of affordable and social rented properties - Average house price to average income ratio - Total net new housing completions - Total additional affordable dwelling completions/acquisitions - Number of houses in multiple occupation - Vacant dwellings - Average house price to average income ratio. - Unfit Dwellings (all housing types)
GREEN SPACE 16. Create, enhance, protect, connect and improve access to open spaces.	<ul style="list-style-type: none"> ▪ Ensure existing open spaces, gardens and allotments are protected and enhanced? ▪ Support the provision of new green space, including opportunities for wildlife, local food production and improved access for recreation and leisure? 	<ul style="list-style-type: none"> - No. of parks with Green Flag/Green Pennant - ANGST standards - Access to public open space - Access to woodland - Registered parks and gardens <ul style="list-style-type: none"> - - Number and Area of land designated as Local Nature Reserves
EDUCATION AND SKILLS 17. Improve access to education and life-long learning and enhance skills.	<ul style="list-style-type: none"> ▪ Support the provision of accessible education, training and upskilling opportunities? ▪ Support the provision of an appropriately skilled workforce to meet the needs of existing and future businesses? ▪ Support the creation of flexible jobs to meet the changing needs of the population? ▪ Support community enterprises and the voluntary sector? 	<ul style="list-style-type: none"> - Education Deprivation/ Skills: NVQ4 or higher/ Education: No qualifications. - 15 year olds achieving 5+ GCSE's at grades A* to /c - Percentage of unemployed people claiming benefits who have been out of work for a year or longer - Number of economically active on Job Seekers Allowance. - Job seekers allowance (caseload per 1,000)
CULTURE AND TOURISM 18. Protect and enhance cultural heritage and promote tourism	<ul style="list-style-type: none"> ▪ Increase public access to cultural facilities? ▪ Enhance the cultural heritage of settlements? 	<ul style="list-style-type: none"> - Number of conservation areas - Percentage of conservation areas with up to date: character appraisals and management proposals - Culture south west Action Plan identified needs met - Percentage of work force in tourism related industries - Total estimated tourism spend - Conservation Areas with Management Plans.

Appendix 4: Sustainability Appraisal of the Broad Locations

Please see separate document

Appendix 5: Sustainability Appraisal of the JCS Development Scenarios

Scenario A

Development Scenario A – Urban Capacity	No. of homes
Base Capacity Plus Windfalls Gloucester Area	8400
Base Capacity Plus Windfalls Cheltenham Area	4300
Base Capacity Plus Windfalls Tewkesbury/Ashchurch Urban Area	500
Base Capacity Tewkesbury Rural Areas	600
1. Base Capacity Total	13,800
2. Rural Areas Total	2,400
3. Broad Location Total	0
DEVELOPMENT TOTAL	16,200
Development Target	16,200
Residual Development Requirement	0

NB. Figures have been rounded to the nearest hundred

Summary

This scenario focuses the majority of residential development on the existing urban areas of Gloucester, Cheltenham and Tewkesbury/Ashchurch with an additional 2400 homes to be delivered across the rural part of the JCS area over the plan period. To achieve this, only land already within the existing supply either as existing permissions, allocations or windfall development are taken into account.

This scenario is likely to be the most environmentally sustainable options due to the limited quantum of development envisaged and its focus on existing urban areas, however the limitation placed on development is likely to lead to an increase in long distance car borne commuting both into and out of the JCS area in the long term. Although there is potential for some loss of biodiversity due to redevelopment of long term brownfield land these impacts can generally be mitigated. There is some potential for increased development pressure on existing green corridors and green open spaces due to urban intensification which is less likely to accommodate wildlife into new development. Impacts on the European site within and adjacent to the JCS area are minimised under this scenario due to the limited level of development.

Worsening housing affordability is the key negative impact associated with this scenario. Despite early decreases made to the net newly arising need in affordable housing, it is likely that over the entire plan period the JCS will need to be delivering almost 2500 affordable homes per year by 2031 to meet the overall need. The ability of people to meet the cost even of an 'affordable rent' product are also likely to decrease over the plan period. Lack of affordability could also lead to stagnation in the housing market leading to increased under-occupation of homes by the growing lone over 60s households, possible increases in long distance commuting as people can no longer afford to live in the area, and impacts on the attractiveness of the area for employers. Restrictions to the level of development made by this scenario mean that the level of developer contributions that can be secured towards improvements to services will be limited; in the long term this may lead to services declining due to lack of continuous investment. This scenario is likely to result in a more dense urban fabric with a higher population density. This will make access to goods and services by walking, cycling and public transport a more viable option due to the shorter distances that need to be covered.

The limitations placed on development land under this scenario are likely to lead to restrictions on economic growth in the B and non B class sectors. While in the early part of the plan period a degree of economic growth can be secured due to "spaceless" growth and accommodated through existing allocations and permissions, in the latter half of the plan period the lack of available employment land for B Class growth is likely to lead to the JCS area becoming a less attractive place to for business to relocate, start up, or expand in. There may also be an associated reduction in skills, training and apprenticeships opportunities across the area as employers cannot expand or move to alternative premises more suitable for their requirements. A large proportion of the economic growth over the plan period is predicted to be in the non B class sectors such as retail, tourism and construction. There are land requirements associated with these sectors that are unlikely to be met under the restricted level of land made available under this scenario.

SA Objective/Indicator	Commentary	Performance
<p>1. Biodiversity Overall likely biodiversity impact?</p>	<p>Short term This scenario focuses on sites within the existing urban area and land peripheral to it, a high proportion of this, particularly within Gloucester and Cheltenham comprises previously developed land. Brownfield redevelopment may offer the opportunity for biodiversity improvements on central area sites, however some long term brownfield sites may have some biodiversity value that could be maintained; in all cases biodiversity could be maintained or improved if planned into new development proposals at the earliest possible stage. During construction there could be adverse impacts on biodiversity value. However, it is expected that the JCS will contain a policy requiring all major development proposals to be accompanied by an environmental management plan which would identify any potential negative impacts and provide avoidance and mitigation strategies.</p> <p>The JCS is likely to have “in combination” effects on a number of European sites that lie either within, or in close proximity to, the JCS area. These include possible direct effects from construction on the Cotswold Beechwoods and Dixton Wood SAC. The scale of these impacts will be minimised by this scenario compared to the others due to the lower level of development envisaged under this scenario.</p>	<p>GREEN/ AMBER</p>

SA Objective/Indicator	Commentary	Performance
	<p>Long term</p> <p>Generally little biodiversity impact is anticipated owing to existing housing commitments and allocations coming forward. The redevelopment of brownfield land, especially that which has been contaminated, offers the opportunity to introduce some biodiversity improvements on central area sites.</p> <p>The JCS is likely to have “in combination” effects on a number of European sites that lie either within, or in close proximity to, the JCS area. These include possible long term effects from air pollution from traffic on Cotswold Beechwoods and Rodborough Common SACs, recreational damage and disturbance on Cotswold Beechwoods and Severn Estuary SACs, effects on water quality and levels on the Severn Estuary and River Wye SACs and impacts on bat foraging areas and flight lines on Wye Valley and Forest of Dean Bat Sites SAC. The scale of these impacts will be minimised by this scenario compared to the others due to the lower level of development envisaged under this scenario.</p> <p>While the majority of sites under this scenario are brownfield, some are not and their loss may have biodiversity implications. It should also be noted that some brownfield sites, particularly within the Tewkesbury/Ashchurch urban area and rural areas may contain unique habitats for wildlife and/or protected/endangered flora and fauna. Where this is the case it will be important to ensure that new development protects and/or mitigates against adverse impacts as far as possible.</p>	<p>GREEN/ AMBER</p>
<p>2. Climate Change Mitigation</p> <p>How will this scenario impact on greenhouse gas emissions?</p>	<p>Short term</p> <p>All new development is likely to increase greenhouse gas emissions in the short term due to the high embodied carbon in construction materials, particularly concrete and steel. The greater the amount of new development, the higher the carbon emissions from construction. This scenario is likely to perform better than the others in terms of greenhouse gas emissions, purely because it advocates less development. However, any benefits need to be weighed against the likelihood of increased commuting which a lack of housing may engender. Restricting the amount of new housing development could have a positive impact on emissions by making retrofitting of existing properties to higher energy efficiency standards a more attractive alternative.</p>	<p>GREEN</p>

SA Objective/Indicator	Commentary	Performance
	<p>Long term</p> <p>The amount of greenhouse gases emitted will increase due to new development, however the JCS is expected to contain sustainable construction policies which will seek to reduce greenhouse gas emissions through achieving high levels of energy efficiency and a requirement for renewable energy technologies to be incorporated into large scale development. The JCS is expected to require good design and sustainable construction techniques to lower carbon emissions in use and this will have a positive impact on the aim to reduce carbon emissions.</p> <p>The proportional relationship between the amount of new development and the level of carbon emissions from construction mean that this limited development scenario will perform better than the other scenarios which seek higher levels of new development. In addition, this scenario anticipates the lowest level of population growth which in turn reduces the number of people within the JCS area contributing to greenhouse gas emissions.</p> <p>NB. This objective does not include transport emissions which are assessed under Objective 8: Sustainable Transport. However, restricting the amount of new housing development could mean that in the long term people seeking accommodation may have to live out of the immediate area which would have negative impact on greenhouse gas emission arising from commuting.</p>	GREEN
<p>3. Climate change Adaptation</p> <p>4. Flooding How will this scenario impact on flood risk including risk to people and property</p>	<p>This objective is not assessed as part of the Scenario Testing. Flooding is considered separately and other climate change adaptation techniques will be a fundamental part of the design of individual developments.</p> <p>Short term</p> <p>Existing residential commitments will have already taken flooding into consideration. Allocations for residential development should be sequentially selected in accordance with Planning Policy Statement 25: Development and Flood Risk. Provided that construction activity does not lead to, or exacerbate, flood risk through contributing to the silting of watercourses due to activities such as wheel washing, there are no anticipated negative impacts on this objective in the short-term. In addition, it is anticipated that the JCS will require all major developments to be accompanied with an environmental management plan which will encompass both construction and in-use issues.</p>	GREEN/ AMBER

SA Objective/Indicator	Commentary	Performance
	<p>Long Term</p> <p>This scenario does not anticipate any large scale extensions to the existing urban areas so the majority of existing water retention and attenuation capacity across the broad locations would be retained. However, constraining development within the existing urban areas means that there may be pressure to bring forward sites which are sequentially less preferable and more at risk of flooding than some sites outside the urban area. Some existing brownfield sites may contribute to attenuation in the urban area thus reducing surface water run-off. Under this scenario the majority of development occurs within the first ten years of the plan period and the impact of this relatively rapid development of sites within the urban area would need to take into account appropriate drainage upgrades to ensure that storm water is dealt with effectively.</p>	<p>GREEN/ AMBER</p>
<p>5. Natural Environment How will this scenario impact on the quality of natural resources: Landscape, Soil, and Water</p>	<p>Short term</p> <p>This scenario relies heavily on regeneration and brownfield sites to deliver development; the majority of the new built form would therefore be within an essentially urban landscape and would have little impact on existing landscape character of urban fringes compared to the other scenarios. Development in rural areas would be expected to be situated to minimise landscape impacts, however there is potential for rural development to impact negatively on the landscape.</p> <p>Contaminated sites being brought forward under this scenario would require decontamination. The JCS is expected to require all major development proposals to be accompanied with stringent environmental management strategies and plans which will ensure protection and mitigation of the environment and resources during construction.</p>	<p>GREEN/ AMBER</p>
<p>6. Natural Environment How will this scenario impact on the objective to minimise the use of our natural resources including soil, water and</p>	<p>Long term</p> <p>Is likely to result in pressure to deliver additional residential development on existing green space in the urban areas.</p> <p>Short term</p> <p>This scenario offers the opportunity to reuse/recycle brownfield waste material on site. It will initially have little impact on existing agricultural land or green field sites as the majority of development will be focused on brownfield sites in existing urban areas. The majority of development requires a water supply placing demand on both supply of clean water and infrastructure to process waste water and sewage.</p>	<p>AMBER</p> <p>AMBER</p>

SA Objective/Indicator	Commentary	Performance
<p>best and most versatile/Greenfield land?</p>	<p>Long term May impact on green field sites and green open space in urban areas if pressure to incorporate all new development in existing urban areas persists.</p> <p>The majority of new development requires a water supply, placing demands on supplies of clean water and the infrastructure to process waste water and sewage. However, this scenario minimises population growth in comparison with the other scenarios thus reducing the overall consumption of natural resources.</p> <p>Will reduce and restrict opportunities to introduce green infrastructure and wildlife corridors within the urban areas and to retain existing green open spaces.</p>	<p>AMBER</p>
<p>7. Historic Environment How will this scenario impact on the objective to protect and enhance the heritage and character of the JCS area?</p>	<p>Short term New development in the Gloucester urban area will help promote urban regeneration and provide opportunities for reuse/regeneration of historic sites around the City. The Cheltenham Task force sites will help to fill gaps in existing urban form linking together development across the Regency Town. Development within Tewkesbury Master Plan area will aid vitality and vibrancy of the Town.</p> <p>This scenario seeks to contain the majority of the development within existing urban areas so the character of the wider JCS area would be retained. However the distribution of development across the rural area would need to be carefully planned to ensure that the character of historic settlements is retained.</p>	<p>AMBER</p>
	<p>Long term It is expected that the JCS will contain design policies to ensure new development respects and, where possible, enhances the historic environment.</p>	<p>GREEN</p>
<p>8. Sustainable Transport How well will this scenario reduce the need to travel and promote more sustainable transport choices and achieve a modal shift to public transport, cycling and walking.</p>	<p>Short term By concentrating development within existing urban areas best use can be made of existing public transport infrastructure as well as encouraging sustainable modes of transport such as cycling and walking.</p> <p>Under this scenario the majority of travel within the JCS area will be within and between existing urban centres and this provides opportunities for more effective use to be made of existing public transport infrastructure along main arterial route ways.</p> <p>Encouragement for the use of sustainable modes of transport, such as public use bicycles and cycle lanes, has been secured through residential development. The opportunities for this type of infrastructure investment are minimised through the lower quantum of development envisaged by this scenario.</p>	<p>GREEN</p>

SA Objective/Indicator	Commentary	Performance
	<p>Long term This scenario maximises opportunities for development within Gloucester with over 50% of the overall residential development expected for the JCS located within the Gloucester urban area. This may lead to an imbalance between the amount of residential development and employment opportunities within each urban area. Ultimately this scenario may therefore lead to an increase in commuting within the JCS area.</p> <p>Restricting development under this scenario is likely to lead to an increase in long distance car borne commuting both into and out of the JCS area in the long term.</p>	RED
<p>9. Waste and Pollution How will this scenario help minimise waste created during construction and in use, and reduce light, air, noise pollution?</p>	<p>Short term There will be opportunities to reuse and recycle materials on brownfield sites, particularly where existing structures are demolished. The contribution that new urban development makes to light pollution is likely to be negligible. The amount of light pollution in rural areas is likely to be greater due to the darker skies experienced there; the distribution pattern of development to existing settlements will be the biggest determinant of this impact and cannot be assessed at this stage.</p> <p>Long term Waste, light, air and noise pollution when the development is in use will be dependent on the masterplanning of individual sites and whether or not new development is built to the highest environmental standards. It is expected that the JCS will contain policies with regard to sustainable construction and masterplanning.</p>	GREEN
		GREEN/ AMBER

SA Objective/Indicator	Commentary	Performance
<p>10. The economy How well will this scenario help to ensure the availability of employment land, encourage inward investment and support existing businesses?</p>	<p>Short term Limited employment land, in the form of allocations and permissions, is available within the urban areas that provide the development focus under this scenario. Additional requirement for employment land will not be met under this scenario however, allied to this land requirement is an element of “spaceless” growth wherein approximately 10% growth of all B1(a/b) and B8 sector jobs takes place without the need for additional floorspace due to space management efficiencies. This accounts for approximately 1% of the total growth anticipated over the plan period.</p> <p>In the short term “spaceless” growth will allow growth in B1(a/b) and B8 sector jobs as will the take up of existing permissions and allocations. B2/B1(c) sector jobs are set to decrease by an average of 19% across the JCS area which will also free up a certain amount of floorspace. Therefore, in the short term, the impact of constraining development to the urban area will be limited.</p> <p>This scenario allows for employment led development opportunities to come forward in the short term but may discourage inward investment and the expansion of existing businesses as land availability is limited.</p> <p>Long term This scenario limits floorspace dependent employment growth as employment land is limited to existing permissions and allocations. Current forecasts suggest circa 40ha of B Class employment land is required across the JCS area to accommodate anticipated employment growth of approximately 4% in B Class jobs over the plan period.</p> <p>While 1% of the anticipated 15% growth in jobs is expected to be achieved without a net increase in floorspace, 14% is land dependent. The anticipated further diversification of the economy into non B Class uses accounts for over 11% of the anticipated growth, however the land requirements for this have not been taken into account by this scenario.</p> <p>The impact of the lack of available land for both traditional B Class employment and Non B class employment growth is likely to be negative, with the JCS area losing its attractiveness as a business location. There may also be limitations placed on existing businesses seeking to expand and/or relocate. In addition, the limitations placed on residential development under this scenario are likely to see the JCS area becoming a net exporter of people by the end of the plan period possibly in response to the increasing house prices. This rise in house prices and the reduced number of people able to afford market rents in the area could combine with the lack of available land for employment uses to drive businesses away from the area to the detriment of its economic health and prosperity.</p>	<p>RED/ AMBER</p> <p>RED</p>

SA Objective/Indicator	Commentary	Performance
<p>11. City and Town Centres How well will this scenario ensure the continued vitality and viability of the city and town centres and retail, service, leisure and learning destinations?</p>	<p>Short term In the short term this scenario is likely to have a positive impact on ensuring the continued vitality and viability of city and town centres as all major new development will be concentrated in the main centres.</p> <p>Long term This scenario ensures that Gloucester City continues to grow with an increased overall population and a higher population density accounting for almost three fifths of the population growth experienced over the JCS area. However by restricting residential growth, Cheltenham Borough and to a lesser extent Tewkesbury Borough, experience net decreases in population towards the end of the plan period.</p> <p>The population growth in Gloucester, particularly among younger people, will help to ensure the continued vitality and viability of both the City and its associated district and local centres.</p> <p>With only 27% of the anticipated residential development apportioned to Cheltenham in this scenario and an associated anticipated decrease in the number of working age 25-59 age group, the town may not be able to continue to support its wide retail offer. It appears that under this scenario the town struggles to attract young people or families who would support the vitality and viability of the centre and local leisure facilities.</p> <p>Approximately 7% of the anticipated residential development falls within the Tewkesbury/Ashchurch urban area. While this may support the vitality and viability of the town it is not a large enough quantum of development to secure additional much needed leisure facilities for the town.</p> <p>In the long-term the shortage of available land for development purposes, may push up land values. The focus on urban intensification, particularly for residential use, may serve to squeeze out existing employers and retailers. The restricted level of residential development is expected to significantly increase the net newly arising need for affordable housing over the plan period. Since the JCS will not be able to meet this need under Scenario A, people who cannot access affordable housing may be forced to move away from the area. This polarisation of society is likely to impact on the vitality and vibrancy of the city centres.</p>	<p>RED/AMBER</p> <p>AMBER</p>

SA Objective/Indicator	Commentary	Performance
<p>12. Sustainable Communities How will this scenario contribute towards the need to reduce inequalities in wellbeing and offer opportunities for all?</p>	<p>Short term The main influences exerted by the JCS on this objective are linked to access to affordable housing, health and education. The urban intensification under this scenario is likely to secure access to health and education services by a choice of means of transport but the low level of development envisaged means that contributions towards improvements to services will be limited.</p> <p>During the initial half of the plan period the net newly arising affordable housing need is expected to fall significantly in all three districts. This means that, in the short term, more people will be able to access affordable housing that meets their needs. However, the low level of development anticipated means that the backlog need for affordable housing is not addressed under this scenario and continues to increase.</p> <p>Long term The restricted level of development expected under this scenario will mean that contributions towards improvements to services will be limited; in the long term this may lead to services declining due to lack of continuous investment.</p> <p>Affordability of housing worsens under this scenario. The JCS will need to be delivering almost 2,500 affordable homes per year by 2031, if the need for affordable housing is to be met which far exceeds the overall annual delivery rate anticipated under this scenario. In addition, the proportions of people expected to be able to meet market level rents also falls under this scenario; fewer than half of households will be able to afford to pay a market rent by 2031 in Tewkesbury Borough.</p> <p>The projected increase in single person households and particularly lone elderly households is common to all scenarios but under this scenario the limited residential development opportunities lead to low vacancy rates and a stagnant housing market. This may mean that more households under-occupy their homes and reduces the ability of families to access existing family sized accommodation.</p> <p>Limitations placed on employment led development by the restrictions on land availability are likely to lead to fewer jobs being created within the JCS area. This could have the effect of decreasing access to employment.</p>	<p>AMBER</p>
		<p>RED</p>

SA Objective/Indicator	Commentary	Performance
<p>13. Sustainable Communities How will this scenario help improve community safety and reduce levels of crime and the fear of crime?</p>	<p>Short term The majority of proposed residential development would be delivered in the existing urban areas. This will lead to a more dense urban fabric with a higher population density and greater opportunities for passive surveillance. The provision of dwelling units within existing town and city centres will help reduce fear of crime particularly in the evening as footfall and passive surveillance diversifies away from the patrons of pubs and clubs.</p> <p>Long term The increased number of lone person households, and particularly lone elderly households predicted under all four scenarios is likely to lead to increased fear of crime within the JCS area. This scenario may exacerbate this fear as stagnation in the housing market no longer allows people under occupying their homes to move into smaller or purpose built units where they may have greater contact with others. Lone people under occupying larger units may also be targeted by criminals due to the perception that they are easier targets.</p>	GREEN
<p>14. Health How well will this scenario perform against the objective to improve access for all to health facilities and to promote healthy lifestyles:</p>	<p>Short term This development scenario does little to alleviate the health care deficits currently experienced at various locations within the JCS area. The focus on urban intensification and development is likely to see the redevelopment of a number of regeneration sites within the urban areas. Therefore the aspiration to deliver a new City Centre primary health care facility as part of the regeneration of the Greyfriars site in Gloucester is likely to come to fruition which will help to improve access to health care facilities for residents of Gloucester City Centre. The aspiration to secure improved primary health care facilities within Tewkesbury town centre is not supported by this scenario as the quantum of development envisaged will not secure the level of developer contribution required to make any significant contribution to the funding of the facilities.</p> <p>Development within existing urban areas ensures walking and cycling distances to existing service centres are minimised therefore these modes of transport as realistic alternatives can be promoted and pursued. This approach also ensures that the distances to existing sports centres and recreational facilities are minimised.</p>	AMBER

SA Objective/Indicator	Commentary	Performance
	<p>Long term Limitations placed on employment led development by the restrictions on land availability are likely to lead to fewer jobs being created within the JCS area. This could have the effect of increasing unemployment. Long term unemployment has mental health implications and in addition may result in poverty which links with health as restricted income affects household spend on food and recreational and leisure choices. Health across the JCS area in the long term may suffer as a result of this scenario owing to increased poverty.</p> <p>This scenario sees both the backlog of need for affordable housing and the net newly arising need for affordable housing grow significantly over the plan period. A lack of affordable housing may lead to an increase in the number of households unsuitably housed with higher incidences of overcrowding, concealed households and hidden homelessness; all of which have negative mental health impacts.</p>	AMBER/ RED
<p>15. Housing How well will this scenario perform against the objective to ensure that everyone has access to a decent home that they can afford and meets their need?</p>	<p>Short term The vacancy rates of private stock are likely to fall significantly in the early part of the plan period under this scenario, indicating a healthy housing market with a good level of transactions taking place. During the initial half of the plan period the net newly arising affordable housing need is expected to fall significantly in all three districts. This means that, in the short term, more people will be able to access affordable housing that meets their needs. However, the low level of development anticipated means that the backlog need for affordable housing is not addressed under this scenario and continues to increase.</p> <p>Long term Affordability worsens under this scenario with the percentage of people able to afford even an 'affordable rent' product falling over the latter half of the plan period in all three district areas. The JCS will need to be delivering almost 2,500 affordable homes per year by 2031, if the need for affordable housing is to be met which far exceeds the overall annual delivery rate anticipated under this scenario. In addition, the proportions of people expected to be able to meet market level rents also falls under this scenario.</p>	AMBER
	<p>Under Scenario A the household to dwelling ratios show that, for much of the forecast period, the number of households will exceed the available housing across the JCS area. As household numbers exceed available dwellings then concealed households are necessarily created. This shortfall of available housing is likely to exert upward pressure on house prices and market rents – with demand exceeding supply.</p> <p>House price inflation is expected to be more rapid in the later part of the forecast period under this scenario with a 21% increase in median house price between 2021 and 2031, compared to an 11% increase in the first decade of the forecast period. This will have an impact on</p>	RED

SA Objective/Indicator	Commentary	Performance
	<p>affordability and see fewer people being able to afford to buy; stagnation in the housing market could mean that there is more competition for rental properties which may further drive up the cost of market rents and increase the number of people finding it necessary to access an 'affordable rent' product.</p> <p>Restricted residential development opportunities could have the effect of increasing the density of development which may in turn limit choice with regard to the types of housing available, particularly larger units suitable for families. A lack of new family homes may result in the area becoming less attractive for existing residents and for businesses hoping to relocate to the area. Towards the end of the plan period this scenario sees the most significant net out migration of all the scenarios. While existing residents may migrate away from the JCS area due to the lack of available affordable housing they may continue to work in the JCS area. In turn, this may lead to increased levels of in-commuting to the JCS area with associated congestion implications.</p> <p>The opportunities to plan for the increasingly aged population in terms of sheltered or extra care housing will be limited by the restrictions to the amount of land available under this scenario.</p>	
<p>16. Green/Open Space Will this scenario protect and improve access to public green and open space and/or offer opportunities to create and enhance new open space, along with providing a network of green and open space?</p>	<p>Short term May impact on green field sites and green open space in urban areas if pressure to incorporate all new development in existing urban areas persists.</p> <p>Long term Will reduce and restrict opportunities to introduce green infrastructure, open and green spaces and wildlife corridors within the urban areas and to retain existing green open spaces.</p>	RED/ AMBER
<p>17. Education and Skills How well will this scenario help ensure access to education for all (including lifelong learning and skills enhancement)?</p>	<p>Short term Existing schools will be able to accommodate children from the residential development expected across the JCS area under this scenario. Moreover, residents of the development within the urban areas will be able to access existing public transport routes to gain access to existing FE colleges at campuses in both Gloucester and Cheltenham.</p> <p>Opportunities for adult education are accessible at both Gloucester and Cheltenham with public transport options along arterial highways between the main centres and from Tewkesbury and Bishops Cleeve. Adult education opportunities are limited within the Tewkesbury/Ashchurch urban area and urban intensification will do little to address this.</p>	AMBER/ RED

SA Objective/Indicator	Commentary	Performance
	<p>Long term Cheltenham and Gloucester currently offer very good education and training opportunities catering for all ages and levels of educational attainment. The situation in Tewkesbury is less positive in terms of adult education provision. However, under this scenario, the 25-59 age group is expected to fall by 11% across the JCS area which may have a corresponding impact on the demand for adult education.</p> <p>In the long term the restrictions on the amount of available employment land may affect ability of employers to develop skills, training and apprenticeship opportunities across the JCS area.</p> <p>The restricted housing development under this scenario leads to a net decrease in the 0-14 year age group in both Cheltenham and Tewkesbury Boroughs towards the end of the plan period. This may be due to predicted stagnation in the housing market with low vacancy rates expected in both Cheltenham and Tewkesbury Boroughs. One of the possible outcomes of this may be a net over provision of educational facilities within the JCS area.</p>	<p>AMBER/ RED</p>
<p>18. Culture and Tourism How will this scenario perform against the objective to protect and enhance our cultural heritage and promote sustainable tourism?</p>	<p>Short term There are few opportunities for Cheltenham and Tewkesbury Boroughs to enhance cultural heritage if only a small income is generated from development in terms of business rates/council tax/new homes bonus.</p> <p>Opportunities for Gloucester to continue to secure vitality and vibrancy of the City Centre as part of the heritage led urban regeneration will continue.</p> <p>Long term In common with all the scenarios there is a risk of changes to the character of the existing built form of Cheltenham Town owing to increased demand to build on existing vacant spaces, this in turn may impact on the tourism industry as the character and form of the town changes. In addition the rural residential development has not been attributed to individual villages and there is a risk that unsympathetic development could harm the character and/or setting of particularly sensitive villages.</p> <p>Jobs in the tourism industry are traditionally low paid and the lack of affordable homes resulting from pursuing this scenario is likely to impact on the number of workers available to work in the industry.</p> <p>Under this scenario a 57% increase in the over 60s population is anticipated, this may result in urban centres being perceived as retirement locations rather than places for young adults to visit or relocate to.</p>	<p>AMBER</p>
		<p>AMBER</p>

Scenario B

Development Scenario B – 90% Demographic	No. of homes
Base Capacity Plus Windfalls Gloucester Area	8400
Base Capacity Plus Windfalls Cheltenham Area	4300
Base Capacity Plus Windfalls Tewkesbury/Ashchurch Urban Area	500
Base Capacity Tewkesbury Rural Areas	630
1. Base Capacity Total	13,800
2. Rural Areas Total	2,400
Broad Location G1	3100
Broad Location G4	1500
Broad Location G9	750
Broad Location C3	4450
Broad Location C6	1300
Broad Location T2	2100
3. Broad Location Total	13,200
DEVELOPMENT TOTAL	29,500
Development Target	33,200
Residual Development Requirement	3,700

NB. Figures have been rounded to the nearest hundred

Summary

In addition to the land already within the existing supply either as existing permissions, allocations or windfall development this scenario anticipates a further 13,200 dwellings being brought forward together with circa 40ha of employment land in a number of broad locations adjacent to the existing urban areas of Gloucester, Cheltenham and Tewkesbury/Ashchurch. Within the rural areas, 2400 homes are to be delivered at a rate of 120 per annum over the plan period. In addition to this a further 3700 homes will be delivered in locations that will be specified as the JCS develops. The rate of delivery under this scenario aims to meet the needs of 90% of the projected population to 2031. This scenario anticipates a balanced rate of delivery throughout the JCS with development in the first ten years approximately equal to the development expected in the latter half of the plan period.

This scenario is likely to be of medium environmentally sustainability due to the moderate level of development envisaged and its initial focus on the existing urban area. Although there is potential for some loss of biodiversity due to redevelopment of long term brownfield land these impacts can generally be mitigated. Impacts on the European sites within and adjacent to the JCS area are less likely under this scenario than for Scenarios C and D due to the lower level of development; for Scenarios B, C and D these effects are most likely to arise from development within broad locations G1, C3 and T2. There are some potential improvements to both biodiversity and access to green and open space that may be made under this scenario. The impact on flooding is likely to be balanced under this scenario. The development envisaged within the broad locations could be accommodated within areas not affected by flooding and careful use of SUDs could mean that surface permeability is maintained. Positive environmental impacts under this scenario are contingent on the residual development being accommodated in such a way as to maintain biodiversity, green and open space and avoiding flood prone areas. Development within the broad locations offers opportunities to make best use of existing public transport links to the urban centres.

Despite early decreases made to the net newly arising need in affordable housing, it is likely that over the entire plan period the JCS will need to be delivering almost 1800 affordable homes per year by 2031 to meet the overall need arising under this scenario. The requirement for affordable housing will rise by a modest amount in both Gloucester City and Cheltenham Borough but is likely to fall by over a third across Tewkesbury Borough. The level of people able to meet the cost of both market rents and 'affordable rent' products remain approximately stable over the plan period under this scenario. Restrictions to the level of development made by this scenario mean that the level of developer contributions that can be secured towards improvements to services will be limited; in the long term this may lead to services declining due to lack of continuous investment. With the exception of C6, the levels of development envisaged at the broad locations would be likely to require enhanced healthcare facilities which could result in better access to healthcare for the surrounding populations.

In the early part of the plan period a degree of economic growth can be secured due to "spaceless" growth and accommodated through existing allocations and permissions. In the mid and latter half of the plan period, employment land will need to be provided within the broad locations. In common with Scenarios C and D there may be a certain lag in the development of employment sites within the broad locations. This may mean that employment led development opportunities come forward within the urban areas but further inward investment and expansion of existing businesses is delayed for a short time. A large proportion of the economic growth over the plan period is predicted to be in the non B class sectors such as retail, tourism and construction. There are land requirements associated with these sectors that could be met within the broad locations proposed for development even if the residual requirement for residential development were also to be accommodated in these areas.

Suggested locations for residual development

Southernmost areas of C2c, C2d

C5

T2 – but sensitive to landscape considerations to the north of the site

SA Objective/Indicator	Commentary	Performance
<p>3. Biodiversity Overall likely biodiversity impact?</p>	<p>Short term The mixture of green and brownfield development envisaged by this scenario offers the opportunity for biodiversity improvements on brownfield sites coupled with possible losses to biodiversity on greenfield sites. Brownfield redevelopment may offer the opportunity for biodiversity improvements on central area sites, however some long term brownfield sites may have some biodiversity value that could be maintained; in all cases the approach to biodiversity needs to be planned into new development proposals at the earliest possible stage. During construction there could be adverse impacts on biodiversity value. However, it is expected that the JCS will contain a policy requiring all major development proposals to be accompanied by an environmental management plan which would identify any potential negative impacts and provide avoidance and mitigation strategies.</p> <p>The JCS is likely to have “in combination” effects on a number of European sites that lie either within, or in close proximity to, the JCS area. These include possible direct effects from construction on the Cotswold Beechwoods and Dixton Wood SAC. These impacts will be predominantly due to development at broad locations T2 and G1 but may also arise from the residual residential development dependent on it’s location.</p> <p>Long term Development within the broad locations could, with carefully masterplanning, provide for significant improvements to local biodiversity value. The impact on biodiversity at each of the broad locations is considered in turn:</p> <p>Broad Location G1 The Innsworth Meadow SSSI (considered to be in unfavourable/recovering position) is situated in the centre of this broad location, without intervention measures this SSSI will continue to decline long term due to isolation from like habitat. A small area of Lowland Meadow BAP is situated to the centre of the site. Coastal and floodplain grazing marsh BAP is situated along the western site boundary, however because this is also a flood constraint area and strategic SuDS will need to be implemented, sympathetic development of G1 could have a positive impact on BAP habitats. Development of this site offers opportunities to introduce proactive management of the SSSI and also reconnect it to the wider habitat. The impact on this objective is therefore uncertain, it would be dependent on how well biodiversity and habitat protection and enhancement are integrated into the detailed masterplans for the site.</p> <p>Broad Location G4 This area contains no biodiversity/habitat designations although it does contain a small</p>	<p>GREEN/ AMBER</p> <p>GREEN/ AMBER</p>

SA Objective/Indicator	Commentary	Performance
	<p>remnant orchard off Brockworth Lane and an orchard off the A46. In addition there is useful habitat along the Horsbere Brook. Retention of the orchards, along with maintenance and enhancement of a linear riparian strip along the brook, could lead to significant biodiversity improvements resulting from development of this site. However, the 1,500 new units suggested for this area, is expected to make retention of these features problematic.</p> <p>Broad Location G9 This area is poor in biodiversity. It is isolated by development and road infrastructure with no connection to other habitat. It is predominantly intensively farmed. A mature hedgerow along the B4063 and perhaps the ditch line could be readily incorporated into any development envisaged at this location. Biodiversity levels could be improved with development of this site, provided making space for wildlife is incorporated at an early stage of the development.</p> <p>Broad Location C3 This area contains no biodiversity/habitat designations. Its current biodiversity quality has been deemed low to moderate although the area does contain a number of protected species. Sympathetic development of sites within the broad location has potential for making space for wildlife and improvements in biodiversity value.</p> <p>Broad Location C6 This area contains a good mosaic of habitat types and biodiversity which could make mitigation difficult. The dominant land use is grazing, which has potentially higher ecological value in comparison to more intensively managed agricultural land. The impact of development would be negative but there are opportunities for enhancement through the creation of green corridors.</p> <p>Broad Location T2 The south of this area has no biodiversity/habitat designations, as it consists of a brownfield site with a significant amount of hardstanding. Development of this area could offer some significant enhancement of biodiversity/habitat features provided making space for wildlife is included in development proposals at an early stage.</p> <p>The JCS is likely to have “in combination” effects on a number of European sites that lie either within, or in close proximity to, the JCS area. These include possible long term effects from air pollution from traffic on Cotswold Beechwoods and Rodborough Common SACs, recreational damage and disturbance on Cotswold Beechwoods and Severn Estuary SACs, effects on water quality and levels on the Severn Estuary and River Wye SACs and impacts on bat foraging areas and flight lines on Wye Valley and Forest of Dean Bat Sites SAC. The</p>	

SA Objective/Indicator	Commentary	Performance
<p>4. Flooding How will this scenario impact on flood risk including risk to people and property</p>	<p>Short term Existing residential commitments will have already taken flooding into consideration. Allocations for residential development should be sequentially selected in accordance with Planning Policy Statement 25: Development and Flood Risk. Provided that construction activity does not lead to, or exacerbate, flood risk through contributing to the silting of watercourses due to activities such as wheel washing, there are no anticipated negative impacts on this objective in the short-term due to the development in the urban centres. It is anticipated that the JCS will require all major developments to be accompanied with an environmental management plan which will encompass both construction and in-use issues.</p> <p>Long Term The development of greenfield land under this scenario could see an increase in the negative impacts of flooding as existing attenuation and surface water storage opportunities may be reduced through development. However, careful planning of the development to incorporate SUDS and/or increased water holding capacity through the creation of balancing ponds or water features could result in a positive impact. Under this scenario development is spread fairly evenly over the plan period which should ensure that appropriate upgrades to sewerage and drainage infrastructure have sufficient lead in time to take place ahead of the development.</p> <p>This moderate growth scenario means that development can be directed away from areas of flood risk. This scenario will enable new development to comply with the sequential approach for site selection and offers limited potential to improve the area of existing flood plain as part of development proposals. Development that increases the amount of impermeable surfaces can result in an increase in surface water run-off, which in turn can result in increased flood risk both locally and elsewhere within the catchment area. Scenario B is likely to involve a larger land take with an associated larger increase in impermeable surfaces than Scenario A, but will perform better than Scenarios C or D, which will necessitate more development. The extent to which development impacts on flood risk will depend upon not only its location but also its design and the level to which SuD technologies are applied.</p> <p>The majority of the urban development under this scenario is envisaged over the first ten years of the plan period and this relatively rapid development of sites within the urban area would need to take into account appropriate drainage upgrades to ensure that storm water is dealt with effectively. In addition some existing brownfield sites may contribute to attenuation in the urban area thus reducing surface water run-off.</p> <p>The flood impacts at each of the broad locations affected by flooding is considered in turn:</p>	<p>GREEN/ AMBER</p> <p>GREEN/ AMBER</p>

SA Objective/Indicator	Commentary	Performance
	<p>Broad Location G1</p> <p>A significant proportion of this broad location lies within an area of high flood risk which bisects the site. Land to the south of the area of high flood risk near Innsworth may be more suitable for development than land to the north as the flood constraint naturally separates the site. The quantity of development envisaged for this location could easily be accommodated to the south of the high risk area. Development at this location will require the use of strategic SUDs. Careful masterplanning and infrastructure provision will need to be implemented to ensure any development on the most north-western parts of this site do not lead to increased flood risk or danger to human health.</p> <p>Broad Location C3</p> <p>This location contain some areas at high risk of flooding however the amount of development proposed can be accommodated on land within the broad location which is not constrained by flood risk. The main risk areas are within the upper reaches of the Hyde Brook (west of Brockhampton) & rural floodplain adjacent to the River Swilgate plus a residual risk of culvert blockage identified upstream of M5 culvert & along the Leigh Brook at Uckington. Important surface water flow routes are identified to the north and south of the site as a result of overland flow from adjacent hills.</p> <p>Development at broad location T2 could have a positive effect on flood risk by reducing the non-porous area of hardstanding.</p>	
<p>5. Natural Environment How will this scenario impact on the quality of natural resources: Landscape, Soil, and Water</p>	<p>Short term</p> <p>The urban development element of this scenario relies heavily on regeneration and brownfield sites to deliver development; the majority of the new built form would therefore be within an essentially urban landscape and would have little impact on existing landscape character of urban fringes compared to the other scenarios. Development in rural areas would be expected to be situated to minimise landscape impacts, however there is potential for rural development to impact negatively on the landscape. The landscape impacts of development at the broad locations is expected to be more apparent in the latter half of the plan period.</p> <p>Contaminated sites being brought forward under this scenario would require decontamination. The JCS is expected to require all major development proposals to be accompanied with stringent environmental management strategies and plans which will ensure protection and mitigation of the environment and resources during construction.</p> <p>Long term</p> <p>The landscape sensitivity of each of the broad locations put forward for development by this scenario is considered in turn:</p>	<p>GREEN/ AMBER</p> <p>AMBER</p>

SA Objective/Indicator	Commentary	Performance
	<p>Broad Locations G1 This location is considered to have an overall low sensitivity. Development at this location will impact upon the existing settlements of Longlevens and Innsworth as well as neighbouring areas of Gloucester. The character and relationship of new development needs to be considered against the existing settlements to ensure that identities are maintained where possible.</p> <p>Broad Location G4 This location is considered to have an overall low sensitivity. Development at this location will impact upon the existing settlements of Brockworth as well as neighbouring areas of Gloucester. The character and relationship of new development needs to be considered against the existing settlements to ensure that identities are maintained where possible. Development at this location would need to consider the existing land typography and neighbouring built form whilst respecting and retaining the strong green corridor and historic influence. Provided these points are designed and considered from the outset then the existing surrounding character could be retained within the landscape. Application of a careful master planned approach development on this site at the level envisaged could be accommodated without having an adverse impact on this objective.</p> <p>Broad Location G9 This location has an overall landscape sensitivity rating of medium to high. The area forms part of the greenbelt dividing Innsworth and Churchdown from the larger expanse of Gloucester city. It has four main communication routes in and around it which connect the outer villages to the larger conurbation. These busy routes have views which are likely to be the key visual receptors of this area. Any development within this site will have the advantage of having the existing urban form encompassing the built form, therefore the scope of mitigation would be low. However, the value of this landscape lies within its function of providing a visual divide between the city and the two villages.</p> <p>Broad Location C3 This location is not identified as having any great sensitivity value in the wider landscape. The area is predominantly a flat, agricultural landscape with very little visual, ecological and cultural qualities. There are opportunities for enhancement through the creation of green corridors, following the River Swilgate and Wyman's Brook to the north west which would also act as mitigation for the development of this area. This could also link to the integration with the proposed Severn Vale Regional Park.</p> <p>Broad Location C6</p>	

SA Objective/Indicator	Commentary	Performance
	<p>The landscape at south Cheltenham is sensitive and would require careful consideration, not least because of the potential impact on the AONB. However, the edge of escarpment location gives this area a great opportunity to provide green corridor linkages into the AONB. This could help to enhance the setting for new residents and help mitigate the loss of some of this landscape for existing local residents while also softening the impact of any development when viewed from the edge of the escarpment.</p> <p>Broad Location T2</p> <p>This location encompasses a large area of brownfield land of low landscape value; its redevelopment is likely to have a positive impact on the landscape quality, provided the wider landscape setting is considered as part of the masterplanning and design process.</p> <p>In terms of water usage and quality; Scenario B is for moderate growth and is therefore likely to perform reasonably well against the need to ensure that water abstraction, run-off and recharge are kept within carrying capacity. However, this will need to be ascertained in discussions with infrastructure providers and public bodies. There is some potential for negative impacts on water quality within the Severn Estuary SAC as a result of the JCS but the full impact would need to be assessed by the HRA.</p>	
<p>6. Natural Environment How will this scenario impact on the objective to minimise the use of our natural resources including soil, water and best and most versatile/Greenfield land?</p>	<p>Short term</p> <p>This scenario offers the opportunity to reuse/recycle brownfield waste material on site. In the earlier stages of the plan the impact on existing agricultural land or green field sites will be minimised as the majority of development will be focused on brownfield sites in existing urban areas.</p> <p>The majority of development requires a water supply placing demand on both supply of clean water and infrastructure to process waste water and sewage.</p> <p>Long term</p> <p>The loss of agricultural land is inevitable within this scenario as development within the broad locations is on predominantly greenfield land, the majority of which is agricultural. However, in accordance with the sequential approach for minimising the loss of the best and most versatile agricultural land quality this scenario would result in the loss of lower grade land where possible.</p> <p>Broad Location G1 contains some Grade 1 and Grade 2 agricultural land. Development within this location would be on predominantly Grade 3 but due to flood constraints development is likely to be limited to the southern areas of the floodplain; this would be likely to lead to the loss of some Grade 1 agricultural land unless masterplanning made the provision of open space/allotments on this area.</p>	<p>AMBER</p> <p>AMBER</p>

SA Objective/Indicator	Commentary	Performance
	<p>Broad Location C3 contains some Grade 1 agricultural land and therefore its loss to development would have detrimental impact on this objective. However, the scale of development anticipated at this broad location would mean that a relatively large area of the Grade 1 agriculture land at the far west of the site could remain untouched. Provided opportunities are taken to ensure that some of the high grade agricultural land can be retained within development for allotments, community gardens/orchards, etc., the negative impact can be mitigated.</p> <p>This scenario involves a greater uptake of Greenfield land than Scenario A, but less than Scenarios C and D.</p> <p>The majority of new development requires a water supply, placing demands on supplies of clean water and the infrastructure to process waste water and sewage. However, this scenario anticipates moderate population growth in comparison with scenarios C and D thus reducing the overall consumption of natural resources.</p>	
<p>7. Historic Environment How will this scenario impact on the objective to protect and enhance the heritage and character of the JCS area?</p>	<p>Short term New development in the Gloucester urban area will help promote urban regeneration and provide opportunities for reuse/regeneration of historic sites around the City. The Cheltenham Task force sites will help to fill gaps in existing urban form linking together development across the Regency Town. Development within Tewkesbury Master Plan area will aid vitality and vibrancy of the Town.</p> <p>The distribution of development across the rural area would need to be carefully planned to ensure that the character of historic settlements is retained.</p>	<p>AMBER</p>
	<p>Long term It is expected that the JCS will contain design policies to ensure new development respects and, where possible, enhances the historic environment. This is particularly pertinent to Cheltenham where the drive to reuse brownfield land in the urban area already places pressure on the borough's cultural heritage.</p> <p>Within the Broad Locations there are listed buildings at Twigworth but these would not be detrimentally affected by any development proposal at this location. There could be a significant adverse affect at Broad Location G4; Brockworth Court lies in the centre and represents the ecclesiastical structure of society in the medieval period. It is considered essential to maintain an area of open landscape around these existing historic structures. 1,500 new homes on this narrow linear area could have a significant adverse impact on the</p>	<p>AMBER</p>

SA Objective/Indicator	Commentary	Performance
	<p>setting and historical value of Brockworth Court, however if a smaller scale of development were to be considered, then the area could be more easily be developed in a manner which would not be detrimental to the setting of the historical buildings.</p> <p>Broad Location C3 contains a number of archaeological features, and listed buildings, including a scheduled monument at Tredlington. The level of development envisaged for this location can be accommodated without impacting on these historic features.</p> <p>Broad Location C6 has a strong sense of cultural heritage in spite of the proximity of the area to the urban edge of Cheltenham. The area's sense of place and history is particularly strong due to the presence of the moat and fishpond Scheduled Monument, and historic buildings in the vicinity and the presence of surviving ridge and furrow to the east. However the level of development envisaged on this site mean that it will be difficult to avoid any detrimental impact on the historic environment. A smaller scale of development could more easily accommodate retention of the historic features.</p>	
<p>8. Sustainable Transport How well will this scenario reduce the need to travel and promote more sustainable transport choices and achieve a modal shift to public transport, cycling and walking.</p>	<p>Short term By concentrating development within existing urban areas and peripheral locations best use can be made of existing public transport infrastructure as well as encouraging sustainable modes of transport such as cycling and walking. The concentrations of development envisaged under this scenario at the broad locations make the provision of new public transport infrastructure easier to incorporate into the development at the planning stage.</p> <p>Encouragement for the use of sustainable modes of transport, such as public use bicycles and cycle lanes, has been secured through residential development. The opportunities for this type of infrastructure investment are moderate in line with the moderate level of development envisaged by this scenario.</p> <p>Long term The majority of the development envisaged at each of the Broad Locations will take place in the latter half of the plan period. Each of the locations is dealt with in turn:</p> <p>Broad Locations G1 and G3 Both these locations are adjacent to main transport routes and are considered accessible locations. As such, this scenario maximises the opportunities to both capitalise on existing public transport and increase the opportunities for a choice of means of access to goods and services for the people living in new homes in this area.</p> <p>Broad Location G9 This area is well located close to the A40. In addition, the Old Cheltenham Road bisects the</p>	<p>GREEN</p>
		<p>RED</p>

SA Objective/Indicator	Commentary	Performance
	<p>site from east to west. High frequency bus services between Gloucester and Cheltenham currently traverse the location. Development of this area could (provide a safe green infrastructure network linked into current pedestrian and cycle ways. This location is ideally situated to encourage a modal shift away from the use of the private car.</p> <p>Broad Location C3</p> <p>This area is well connected to Cheltenham by public transport. High frequency bus routes run along Tewkesbury Road and opportunities exist to support travel by non-car modes for the southern and central parts of the this broad location due to its proximity to the north-west periphery of Cheltenham. There is also the potential to include a park and ride facility here, this reducing congestion and associated air pollution in the town centre but may not reduce the number of car based journeys.</p> <p>Broad Location C6</p> <p>Significant opportunities exist at this location to support travel by non-car modes given the close proximity to the South western periphery of Cheltenham and existing public transport. A network of footpaths provides good connections to the urban edge.</p> <p>Broad Location T2</p> <p>This location is a considerable distance from Tewkesbury town centre; however it is well connected to highway infrastructure. There are frequent public transport services through adjacent Northway into both Tewkesbury and Cheltenham town centres with good potential to extend the public transport network into this broad location and to provide some pedestrian and cycling links. However, the high level of employment land already existing and envisaged at this location combined with the relatively low number of residential units may increase in-commuting from the surrounding area. This will have an extremely negative impact on this objective as the majority of these journeys are likely to be by private car. However, it should also be noted that the brownfield site currently used as employment space by the MOD forms a significant part of this broad location. Approximately 630 people are employed on the MOD site; therefore there may be no net increase in the number of in commuting journeys.</p> <p>A protected potential freight railhead exists within this broad location, which should be explored as part of any development at this location. Development at broad location T2 offers opportunities to enhance the station at Ashchurch and frequency of train services serving the area. This could improve the attraction of rail for commuting to the other main centres for both new and existing residents and could make rail freight a viable alternative for both the existing and proposed businesses within and surrounding this location.</p>	

SA Objective/Indicator	Commentary	Performance
	<p>All the broad locations envisaged for development under this scenario offer significant opportunities to implement more sustainable transport choices. The moderate level of development means that congestion should be minimised, however it may also limit funding for essential transport infrastructure improvements.</p> <p>There is potential for either a positive or negative impact on this objective as a result of the residual development envisaged under this scenario. If the development is dispersed across the rural area there is likely to be a negative impact as the provision of public transport in these areas is often problematic without significant public subsidy. If the residual development is concentrated in locations adjacent to existing public transport infrastructure, closer to urban centres, then the provision of public transport and access to services by walking and cycling is less of an issue and may result in a positive impact on this objective.</p>	
<p>9. Waste and Pollution How will this scenario help minimise waste created during construction and in use, and reduce light, air, noise pollution?</p>	<p>Short term There will be opportunities to reuse and recycle materials on brownfield sites, particularly where existing structures are demolished. The contribution that new urban development makes to light pollution is likely to be negligible. The amount of light pollution in rural areas is likely to be greater due to the darker skies experienced there; the distribution pattern of development to existing settlements will be the biggest determinant of this impact and cannot be assessed at this stage.</p> <p>Long term Waste, light, air and noise pollution when the development is in use will be dependent on the masterplanning of individual sites and whether or not new development is built to the highest environmental standards. It is expected that the JCS will contain policies with regard to sustainable construction and masterplanning. The feasibility of using waste for energy when planning for large scale developments could also be investigated.</p> <p>The greater the number of households in the area, the greater the likelihood of increased waste arisings overall. Providing space to store recyclable materials within developments and provision of recycling centres can help encourage more sustainable habits among the population and may reduce waste arisings per capita. The provision of recycling facilities this needs to be integrated into careful masterplanning.</p> <p>Broad Location T2 may contain contaminated land; its redevelopment could therefore have a potential positive impact on this objective.</p>	<p>GREEN</p>
		<p>GREEN/ AMBER</p>

SA Objective/Indicator	Commentary	Performance
<p>10. The economy How well will this scenario help to ensure the availability of employment land, encourage inward investment and support existing businesses?</p>	<p>Short term In the early stages of the plan the focus for development under this scenario is within the urban areas where employment land is limited to existing permissions and allocations. Current forecasts suggest circa 40ha of additional B Class employment land is required across the JCS area to accommodate anticipated employment growth of approximately 4% in B Class jobs over the plan period. However, this land requirement is allied to an element of “spaceless” growth wherein approximately 10% growth of all B1(a/b) and B8 sector jobs takes place without the need for additional floorspace due to space management efficiencies. This accounts for approximately 1% of the total growth anticipated over the plan period.</p> <p>In the short term “spaceless” growth may allow growth in B1(a/b) and B8 sector jobs as will the take up of existing permissions and allocations. B2/B1(c) sector jobs are set to decrease by an average of 19% across the JCS area which will also free up a certain amount of floorspace.</p> <p>In common with Scenarios C and D there may be a certain lag in the development of employment sites within the broad location areas under this scenario. This may mean that employment led development opportunities come forward in the short term within the urban areas but further inward investment and expansion of existing businesses is delayed as land availability is limited.</p> <p>Long term Current forecasts suggest a circa 40ha of B Class employment land is required across the JCS area to accommodate anticipated employment growth of approximately 4% in B Class jobs over the plan period. This land requirement is provided by this scenario in common with scenarios C and D.</p> <p>While 1% of the anticipated 15% growth in jobs is expected to be achieved without a net increase in floorspace, 14% is land dependent. The anticipated further diversification of the economy into non B Class uses accounts for over 1% of the anticipated growth, however the land requirements for this have not been taken into account by this scenario. This non B class growth in areas such as construction, hotels and catering and retail will have some associated land requirements which will need to be provided for. Should the unspecified residential residual be located within the broad locations, there is still potential for the land requirements of the non b class growth to be accommodated within these areas due to the modest scale of development envisaged by this scenario.</p> <p>The modest residential development under this scenario is likely to see the JCS area continue to be an area with low housing affordability; the unmet need for affordable housing is</p>	<p>RED/ AMBER</p> <p>AMBER/ RED</p>

SA Objective/Indicator	Commentary	Performance
<p>expected to grow by 10% over the plan period. It is probable that the inaccessibility of market housing to the majority of the population could reduce the attractiveness of the area as a place for business start up and relocation. This in turn could be to the detriment of the economic health and prosperity of the area.</p>		
<p>11. City and Town Centres How well will this scenario ensure the continued vitality and viability of the city and town centres and retail, service, leisure and learning destinations?</p>	<p>Short term In the early part of the plan period this scenario is likely to have a positive impact on ensuring the continued vitality and viability of city and town centres as the majority of new development will be concentrated in the main centres.</p> <p>Long term In common with Scenarios C and D this scenario is expected to see a modest level of population growth across the JCS area. However, this masks an expected decrease in population in the 25-59 age group in both Cheltenham and Tewkesbury Boroughs. It appears that under this scenario Cheltenham Borough struggles to attract working age people who would support the vitality and viability of the centre and local leisure facilities.</p>	GREEN
<p>12. Sustainable Communities How will this scenario contribute towards the need to reduce inequalities in wellbeing and offer opportunities for all?</p>	<p>Short term The main influences exerted by the JCS on this objective are linked to access to affordable housing, health and education. The urban intensification under this scenario is likely to secure access to health and education services by a choice of means of transport but the modest level of development envisaged means that contributions towards improvements to services may be limited.</p> <p>During the initial half of the plan period the net newly arising affordable housing need is expected to fall significantly in all three districts. This means that, in the short term, more people will be able to access affordable housing that meets their needs. However, the modest level of development anticipated means that the backlog need for affordable housing is not addressed under this scenario and continues to increase.</p> <p>In order to bring forward a sustainable community within broad location T2, it is likely to be necessary to provide substantial investment in community infrastructure including a community centre and primary healthcare due to the distance and accessibility of this area to Tewkesbury town centre. It is debatable whether the modest level of homes would be sufficient to secure this level of community infrastructure when site remediation costs are taken into consideration.</p> <p>Long term The modest level of development expected under this scenario will mean that contributions towards improvements to services will be limited; in the long term this may lead to services declining due to lack of continuous investment.</p>	AMBER
		RED/ AMBER

SA Objective/Indicator	Commentary	Performance
	<p>Affordability of housing worsens under this scenario. The JCS will need to be delivering almost 1800 affordable homes per year by 2031, if the need for affordable housing is to be met which exceeds the overall annual delivery rate anticipated under this scenario.</p> <p>The projected increase in single person households and particularly lone elderly households is common to all scenarios but under this scenario the limited residential development opportunities is likely to lead to low vacancy rates and a stagnant housing market within Cheltenham Borough. This may mean that more households under-occupy their homes and reduces the ability of families to access existing family sized accommodation, forcing them to relocate to areas outside of the town.</p>	
<p>13. Sustainable Communities How will this scenario help improve community safety and reduce levels of crime and the fear of crime?</p>	<p>Short term The balance between residential development proposed in the existing urban areas and broad locations envisaged by this scenario mean there are opportunities for positive impacts on this objective. The urban development will lead to a more dense urban fabric with a higher population density and greater opportunities for passive surveillance. The provision of dwelling units within existing town and city centres will help reduce fear of crime particularly in the evening as footfall and passive surveillance diversifies away from the patrons of pubs and clubs. Opportunities exist for new development to employ 'secure by design' principles to design out potential crime hotspots in the built environment.</p> <p>Long term The increased number of lone person households, and particularly lone elderly households predicted under all four scenarios is likely to lead to increased fear of crime within the JCS area. This scenario may exacerbate this fear as the level of development may lead to a sluggish housing market which no longer allows people under occupying their homes to move into smaller or purpose built units where they may have greater contact with others. Lone people under occupying larger units may also be targeted by criminals due to the perception that they are easier targets.</p>	GREEN
<p>14. Health How well will this scenario perform against the objective to improve access for all to health facilities and to promote healthy lifestyles:</p>	<p>Short term The focus on urban intensification and development in the early part of the plan period is likely to see the redevelopment of a number of regeneration sites within the urban areas. Therefore the aspiration to deliver a new City Centre primary health care facility as part of the regeneration of the Greyfriars site in Gloucester is likely to come to fruition which will help to improve access to health care facilities for residents of Gloucester City Centre.</p> <p>The developments envisaged under this scenario will be generally well located to maximise walking, cycling and public transport opportunities to access goods and services. The level of development envisaged should also support enhanced sport and leisure facilities in the urban areas. However, the modest amount of development envisaged for the rural areas will make</p>	GREEN/ AMBER
		AMBER

SA Objective/Indicator	Commentary	Performance
	<p>it difficult for communities to secure funds for upgraded sport and leisure facilities and for health and leisure services to remain viable. There may be scope for some of the residual development envisaged under this scenario to be allocated to rural areas to help secure rural services.</p> <p>Long term</p> <p>In common with Scenario A, this scenario sees both the backlog of need for affordable housing and the net newly arising need for affordable housing grow significantly over the plan period. A lack of affordable housing may lead to an increase in the number of households unsuitably housed with higher incidences of overcrowding, concealed households and hidden homelessness; all of which have negative mental health impacts.</p> <p>Residential development within broad locations G1 & G4 would require enhanced primary health care to the north and east of Gloucester which may result in better provision for those already living in the Innsworth/Longlevens & Brockworth areas.</p> <p>The level of development at envisaged at broad location C3 will require enhanced primary health care infrastructure to the west of Cheltenham which is likely to result in better provision for existing communities at Swindon Village and Uckington. The lower level of development envisaged within location C6 should be absorbed into the existing health care infrastructure to the south of Cheltenham.</p> <p>The aspiration to secure improved primary health care facilities within Tewkesbury town centre is supported by this scenario as the level of development envisaged will contribute to funding of the facilities. However, the distance of the proposed facilities from broad location T2 may mean that health funding for GP or dental services is a higher priority.</p>	<p>AMBER</p>
<p>15. Housing How well will this scenario perform against the objective to ensure that everyone has access to a decent home that they can afford and meets their need?</p>	<p>Short term</p> <p>During the initial half of the plan period the net newly arising affordable housing need is expected to fall significantly in all three districts. This means that, in the short term, more people will be able to access affordable housing that meets their needs. However, the modest level of development anticipated means that the backlog need for affordable housing is not addressed under this scenario and continues to increase.</p> <p>Long term</p> <p>Affordability worsens slightly under this scenario with the percentage of people able to afford 'affordable rent' products predicted to fall slightly over the latter half of the plan period in all three district areas. The JCS will need to be delivering almost 1,800 affordable homes per year by 2031, if the need for affordable housing is to be met which exceeds the overall annual delivery rate anticipated under this scenario. However, while the percentage of affordable</p>	<p>AMBER</p> <p>AMBER/ RED</p>

SA Objective/Indicator	Commentary	Performance
	<p>housing required will increase in both Gloucester and Cheltenham Borough there is likely to be a fall of 43% across Tewkesbury Borough. The proportion of people expected to be able to meet market level rents remains approximately stable over the plan period under this scenario.</p> <p>Under Scenario B the household to dwelling ratios show that, for much of the forecast period, the number of households will exceed the available housing across the JCS area, particularly within Gloucester. As household numbers exceed available dwellings then concealed households are necessarily created. This shortfall of available housing is likely to exert upward pressure on house prices and market rents – with demand exceeding supply.</p> <p>In common with Scenario A, house price inflation is expected to be more rapid in the later part of the forecast period with a 21% increase in median house price between 2021 and 2031, compared to an 11% increase in the first decade of the forecast period. This will have an impact on affordability and see fewer people being able to afford to buy; stagnation in the housing market could mean that there is more competition for rental properties which may further drive up the cost of market rents and increase the number of people finding it necessary to access an ‘affordable rent’ product.</p> <p>The modest level of development planned for the broad locations areas mean that there should be ample opportunity to plan for the increased levels of aged people in terms of sheltered or extra care housing.</p>	
<p>16. Green/Open Space Will this scenario protect and improve access to public green and open space and/or offer opportunities to create and enhance new open space, along with providing a network of green and open space?</p>	<p>Short term There are good opportunities to introduce green infrastructure and enhance open and green spaces both within the urban areas and in the peripheral locations with this modest level of development. However, in common with all the scenarios, there is a risk that the level of development envisaged within the existing urban area may reduce the level of green and open space within the urban fabric.</p> <p>Long term In the latter part of the plan period the majority of development is concentrated in the broad locations. Each of the locations is dealt with in turn.</p> <p>Broad Location G1 Development of this area could have an extremely positive impact on this objective. Part of location G1 is in floodplain and the provision of strategic SuDS can also be used to create strategic green infrastructure and help create a network of greenspace. This will need to be carefully masterplanned into the design of the overall development at a very early stage.</p>	<p>AMBER/ GREEN</p> <p>GREEN/ AMBER</p>

SA Objective/Indicator	Commentary	Performance
	<p>Broad Location G9 This area contains important undeveloped greenspace. There will be opportunities through good design to increase access to this greenspace. Through careful masterplanning a green infrastructure network and the provision of some public green space along the northern border of this area could maintain a degree of separation between Innsworth, Churchdown and Gloucester.</p> <p>Broad Location C3 There are currently allotments within area C3, these will need to be protected, and in addition opportunities should be sought to include community gardens/allotments in new development in an attempt to mitigate against the loss of any high grade agricultural land. However, the level of development envisaged in this area should not encroach on the high grade agricultural land present.</p> <p>Broad Location C6 There is currently a significant amount of green and open space close to this area. There are large sports fields at Leckhampton, as well as allotments and public pathways linking the area into Cheltenham. Development of this area will offer significant opportunities to enhance access to open space provided this is carefully masterplanned at the early stages.</p> <p>Broad Location T2 A significant part of this area consists of hardstanding. There are opportunities here to create green and open spaces as part of any development and also to create links to the adjacent open countryside.</p> <p>Commensurate with the moderate levels of development envisaged under this scenario, opportunities to enhance green infrastructure will be limited by the moderate level of income generated from development.</p> <p>The as yet undesignated residual development associated with this scenario carries a low to moderate risk of a negative impact on this objective. The main risk arises if the residual development were to be shared among the broad locations already proposed for development; it would then be a much harder task to incorporate green space into the designs at the masterplanning stage.</p>	
<p>17. Education and Skills How well will this scenario help ensure access to education for all (including</p>	<p>Short term Existing schools will be able to accommodate children from the residential development expected in the urban areas under this scenario. Moreover, residents of the development within the urban areas will be able to access existing public transport routes to gain access to</p>	<p>AMBER/ RED</p>

SA Objective/Indicator	Commentary	Performance
<p>lifelong learning and skills enhancement)?</p>	<p>existing FE colleges at campuses in both Gloucester and Cheltenham.</p> <p>Opportunities for adult education are accessible at both Gloucester and Cheltenham with public transport options along arterial highways between the main centres and from Tewkesbury and Bishops Cleeve. Adult education opportunities are limited within the Tewkesbury/Ashchurch urban area and urban intensification will do little to address this.</p> <p>Existing schools would absorb increased pupil numbers until new facilities provided for primary aged children at broad locations G1, C3 and T2.</p> <p>Long term</p> <p>Cheltenham and Gloucester currently offer very good education and training opportunities catering for all ages and levels of educational attainment. The situation in Tewkesbury is less positive in terms of adult education provision. However, under this scenario, the 25-59 age group is expected to fall by a small amount (1.6%) across the JCS area which may mean that existing provision proves adequate.</p> <p>With the exception of T2, the peripherality of the proposed broad location sites to the main urban areas centres along with good public transport opportunities means that future residents of the broad locations could easily access a good range of education and skills training facilities. In particular G4 offers excellent access to education and skills development. There are a number of nursery and primary schools close to the area which is also in close proximity to Brockworth Enterprise and Community Comprehensive School and Business College.</p> <p>Location T2 is within fairly close proximity to Ashchurch Primary School (20 minute walk). There is a large secondary school at Tewkesbury cannot be considered to be within a 20 minute walking distance. There is a shortage of adult skills and education facilities in Tewkesbury, although Cheltenham's facilities are easily accessible by public transport.</p> <p>There is a risk under that the level of development at each of the broad locations is insufficient to trigger developer contributions to the level of education provision necessary to ease the strain on existing facilities. Under this scenario there is scope for the residual development to be incorporated into the broad locations proposed which may secure contributions for enhanced facilities.</p> <p>Short term</p> <p>Commensurate with the moderate levels of development envisaged under this scenario, opportunities for Cheltenham and Tewkesbury Boroughs to enhance the cultural heritage of the respective boroughs will be limited by the moderate level of income generated from</p>	<p>AMBER/ RED</p>
<p>18. Culture and Tourism How will this scenario perform against the objective to protect and</p>	<p>the respective boroughs will be limited by the moderate level of income generated from</p>	<p>AMBER</p>

SA Objective/Indicator	Commentary	Performance
<p>enhance our cultural heritage and promote sustainable tourism?</p>	<p>development.</p> <p>Opportunities for Gloucester to continue to secure vitality and vibrancy of the City Centre as part of the heritage led urban regeneration are likely to continue under this scenario.</p> <p>Long term</p> <p>In common with all the scenarios there is a risk of changes to the character of the existing built form of Cheltenham Town owing to increased demand to build on existing vacant spaces, this in turn may impact on the tourism industry as the character and form of the town changes.</p> <p>The landscape of the JCS is one of the major attractants for tourists to the area. There is a risk that the location of the residual development envisaged under this scenario has a negative impact on the landscape with associated impacts on the attractiveness of the area. In addition the rural residential development has not been attributed to individual villages and there is a risk that unsympathetic development could harm the character and/or setting of particularly sensitive villages.</p> <p>Under this scenario a 57% increase in the over 60s population is anticipated, this may result in urban centres being perceived as retirement locations rather than places for young adults to visit or relocate to.</p>	<p>AMBER</p>

Scenario C

Development Scenario C – 100% Demographic	No. of homes
Base Capacity Plus Windfalls Gloucester Area	8400
Base Capacity Plus Windfalls Cheltenham Area	4300
Base Capacity Plus Windfalls Tewkesbury/Ashchurch Urban Area	500
Base Capacity Tewkesbury Rural Areas	630
1. Base Capacity Total	13,800
2. Rural Areas Total	2,400
Broad Location G1	3100
Broad Location G4	1500
Broad Location G9	750
Broad Location C3	4450
Broad Location C6	1300
Broad Location T2	2100
3. Broad Location Total	13,200
DEVELOPMENT TOTAL	29,500
Development Target	36,850
Residual Development Requirement	7,400

NB. Figures have been rounded to the nearest hundred

Summary

In addition to the land already within the existing supply either as existing permissions, allocations or windfall development this scenario anticipates a further 13,200 dwellings being brought forward together with circa 40ha of employment land in a number of broad locations adjacent to the existing urban areas of Gloucester, Cheltenham and Tewkesbury/Ashchurch. Within the rural areas, 2400 homes are to be delivered at a rate of 120 per annum over the plan period. In addition to this a further 7400 homes will be delivered in locations that will be specified as the JCS develops. The rate of delivery under this scenario aims to meet the needs of 100% of the projected population to 2031. This scenario anticipates that 56% of the overall development will be delivered in the latter half of the plan period.

This scenario is likely to be of moderate environmental sustainability due to the higher level of development envisaged and its initial focus on the existing urban area. Although there is potential for some loss of biodiversity due to redevelopment of long term brownfield land these impacts can generally be mitigated. Impacts on the European sites within and adjacent to the JCS area are more likely under this scenario than for Scenarios A and B due to the higher level of development; for Scenarios B, C and D these effects are most likely to arise from development within broad locations G1, C3 and T2. There are some potential negative impacts to both biodiversity and access to green and open space under this scenario dependent on how the residual development is distributed. The impact on flooding is likely to be balanced under this scenario. The levels of development currently envisaged within the broad locations could be accommodated within areas not affected by flooding and careful use of SUDs could mean that surface permeability is maintained. Positive environmental impacts under this scenario are contingent on the residual development being accommodated in such a way as to maintain biodiversity, green and open space and avoiding flood prone areas. Although there is scope for some additional development in the majority of the broad locations only C3 and T2 can be recommended to accommodate additional development from the residential residual at this stage. In addition broad locations C5 and C2 may also accommodate some of the residential residual with few negative effects on biodiversity and flooding. Development within the broad locations offers opportunities to make best use of existing public transport links to the urban centres.

Significant decreases are anticipated to the net newly arising need in affordable housing in the first fifteen years of the plan period, however the requirement for affordable housing will rise by a modest amount in both Gloucester City and Cheltenham Borough but is likely to fall by approximately a fifth across Tewkesbury Borough. The level of people able to meet the cost of both market rents and 'affordable rent' products remain approximately stable over the plan period under this scenario, in addition The number of people able to afford to buy increases under this scenario with approximately half of all people being able to afford a home by 2031. This will have positive impacts on ensuring that everyone has access to a decent home at a price they can afford. The level of development envisaged by this scenario is likely to secure the continuation of existing services and secure new services where required. With the exception of C6, the levels of development envisaged at the broad locations would be likely to require enhanced healthcare facilities which could result in better access to healthcare for the surrounding populations. Broad location T2 could accommodate additional development from the residential residual which may make the development more sustainable with regard to access to services.

In the early part of the plan period a degree of economic growth can be secured due to “spaceless” growth and accommodated through existing allocations and permissions. In the mid and latter half of the plan period, employment land will need to be provided within the broad locations. In common with Scenarios B and D there may be a certain lag in the development of employment sites within the broad locations. This may mean that employment led development opportunities come forward within the urban areas but further inward investment and expansion of existing businesses is delayed for a short time. A large proportion of the economic growth over the plan period is predicted to be in the non B class sectors such as retail, tourism and construction. There are land requirements associated with these sectors that it will be difficult to meet within the broad locations proposed for development if the residual requirement for residential development were also to be accommodated in these areas.

Suggested locations for residual development

G3 – but sensitive to landscape considerations

Southernmost areas of C2c, C2d

C5

T2 – but sensitive to landscape considerations to the north of the site

SA Objective/Indicator	Commentary	Performance
	<p>remnant orchard off Brockworth Lane and an orchard off the A46. In addition there is useful habitat along the Horsbere Brook. Retention of the orchards, along with maintenance and enhancement of a linear riparian strip along the brook, could lead to significant biodiversity improvements resulting from development of this site. However, the 1,500 new units suggested for this area, is expected to make retention of these features problematic.</p> <p>Broad Location G9 This area is poor in biodiversity. It is isolated by development and road infrastructure with no connection to other habitat. It is predominantly intensively farmed. A mature hedgerow along the B4063 and perhaps the ditch line could be readily incorporated into any development envisaged at this location. Biodiversity levels could be improved with development of this site, provided making space for wildlife is incorporated at an early stage of the development.</p> <p>Broad Location C3 This area contains no biodiversity/habitat designations. Its current biodiversity quality has been deemed low to moderate although the area does contain a number of protected species. Sympathetic development of sites within the broad location has potential for making space for wildlife and improvements in biodiversity value.</p> <p>Broad Location C6 This area contains a good mosaic of habitat types and biodiversity which could make mitigation difficult. The dominant land use is grazing, which has potentially higher ecological value in comparison to more intensively managed agricultural land. The impact of development would be negative but there are opportunities for enhancement through the creation of green corridors.</p> <p>Broad Location T2 The south of this area has no biodiversity/habitat designations, as it consists of a brownfield site with a significant amount of hardstanding. Development of this area could offer some significant enhancement of biodiversity/habitat features provided making space for wildlife is included in development proposals at an early stage.</p> <p>The JCS is likely to have “in combination” effects on a number of European sites that lie either within, or in close proximity to, the JCS area. These include possible long term effects from air pollution from traffic on Cotswold Beechwoods and Rodborough Common SACs, recreational damage and disturbance on Cotswold Beechwoods and Severn Estuary SACs, effects on water quality and levels on the Severn Estuary and River Wye SACs and impacts on bat foraging areas and flight lines on Wye Valley and Forest of Dean Bat Sites SAC. The</p>	

SA Objective/Indicator	Commentary	Performance
	<p>scale of these impacts will be minimised by this scenario compared to the others due to the lower level of development envisaged under this scenario. These impacts will be predominantly due to development at broad locations G1, T2 and C3 but may also arise from the residual residential development.</p> <p>While the majority of urban sites included under this scenario are brownfield, some are not and their loss may have biodiversity implications. It should also be noted that some brownfield sites, particularly within the Tewkesbury/Ashchurch urban area and rural areas may contain unique habitats for wildlife and/or protected/endangered flora and fauna. Where this is the case it will be important to ensure that new development protects and/or mitigates against adverse impacts as far as possible.</p> <p>The greatest risk to biodiversity under this scenario arises from the as yet unallocated residual development which accounts for over a fifth of the residential development to be provided over the plan period. Since this development is concentrated over the latter half of the plan it constitutes nearly forty percent of the development over that ten year period. While there is potential for this residential development to be accommodated in the areas of search put forward for consideration under this scenario, it is likely that this would have a negative impact on biodiversity. With regards to this objective, the approach most likely to secure positive impacts would be concentrating the residual development in a discrete number of alternative broad locations which could be masterplanned to avoid impacting on existing biodiversity and to provide enhanced habitats where possible. For example, parts of Broad Location C2 and C5 may be suitable for some development with few negative impacts on biodiversity.</p>	
<p>6. Climate Change Mitigation How will this scenario impact on greenhouse gas emissions?</p>	<p>Short term All new development is likely to increase greenhouse gas emissions in the short term due to the high embodied carbon in construction materials, particularly concrete and steel. The greater the amount of new development, the higher the carbon emissions from construction. This scenario is therefore assessed as having a medium negative impact compared to the other scenarios due to the medium level of development it envisages.</p> <p>Long term The amount of greenhouse gases emitted will increase due to new development; however the JCS is expected to contain sustainable construction policies which will seek to reduce greenhouse gas emissions through achieving high levels of energy efficiency and a requirement for renewable energy technologies to be incorporated into large scale development. The JCS is expected to require good design and sustainable construction techniques to lower carbon emissions in use and this will have a positive impact on the aim to reduce carbon emissions.</p>	<p>GREEN/ AMBER</p> <p>AMBER</p>

SA Objective/Indicator	Commentary	Performance
	<p>The proportional relationship between the amount of new development and the level of carbon emissions from construction means that this development scenario will contribute medium to high levels of greenhouse gas emissions compared with the other development scenarios.</p> <p>NB. This objective does not include transport emissions which are assessed under Objective 8: Sustainable Transport. However, restricting the amount of new housing development could mean that in the long term people seeking accommodation may have to live out of the immediate area which would have negative impact on greenhouse gas emission arising from commuting.</p>	
<p>3. Climate change Adaptation</p>	<p>This objective is not assessed as part of the Scenario Testing. Flooding is considered separately and other climate change adaptation techniques will be a fundamental part of the design of individual developments.</p>	
<p>4. Flooding How will this scenario impact on flood risk including risk to people and property</p>	<p>Short term Existing residential commitments will have already taken flooding into consideration. Allocations for residential development should be sequentially selected in accordance with Planning Policy Statement 25: Development and Flood Risk. Provided that construction activity does not lead to, or exacerbate, flood risk through contributing to the siting of watercourses due to activities such as wheel washing, there are no anticipated negative impacts on this objective in the short-term due to the development in the urban centres. It is anticipated that the JCS will require all major developments to be accompanied with an environmental management plan which will encompass both construction and in-use issues.</p> <p>Long Term The development of greenfield land under this scenario could see an increase in the negative impacts of flooding as existing attenuation and surface water storage opportunities may be reduced through development. However, careful planning of the development to incorporate SUDS and/or increased water holding capacity through the creation of balancing ponds or water features could result in a positive impact. Under this scenario development is skewed towards the latter half of the plan period which will allow appropriate upgrades to sewerage and drainage infrastructure to take place ahead of the development.</p> <p>This higher growth scenario can still be implemented without directing development towards areas of flood risk provided that the sequential approach for site selection is adhered to.</p> <p>Development that increases the amount of impermeable surfaces can result in an increase in surface water run-off, which in turn can result in increased flood risk both locally and elsewhere within the catchment area. Scenario C is likely to involve a large land take with an associated large increase in impermeable surfaces, however it will perform better than</p>	<p>GREEN/ AMBER</p>
		<p>GREEN/ AMBER</p>

SA Objective/Indicator	Commentary	Performance
	<p>Scenario D. The extent to which development impacts on flood risk will depend upon not only its location but also its design and the level to which SuD technologies are applied.</p> <p>The majority of the urban development under all scenarios is envisaged over the first ten years of the plan period and this relatively rapid development of sites within the urban area would need to take into account appropriate drainage upgrades to ensure that storm water is dealt with effectively. In addition some existing brownfield sites may contribute to attenuation in the urban area thus reducing surface water run-off.</p> <p>The flood impacts at each of the broad locations put forward for development but affected by flooding is considered in turn:</p> <p>Broad Location G1</p> <p>A significant proportion of this broad location lies within an area of high flood risk which bisects the site. Land to the south of the area of high risk near Innsworth may be more suitable for development than land to the north as the flood constraint naturally separates the site. The quantity of development envisaged for this location could easily be accommodated to the south of the floodplain. Development at this location will require the use of strategic suds. Careful masterplanning and infrastructure provision will need to be implemented to ensure any development on the most north-western parts of this site do not lead to increased flood risk or danger to human health.</p> <p>Broad Location C3</p> <p>This location contain some area of high flood risk, however the amount of development proposed can be accommodated on land within the broad location which is not constrained by flood risk. The main risk areas are within the upper reaches of the Hyde Brook (west of Brockhampton) & rural floodplain adjacent to the River Swilgate plus a residual risk of culvert blockage identified upstream of M5 culvert & along the Leigh Brook at Uckington. Important surface water flow routes are identified to the north and south of the site as a result of overland flow from adjacent hills.</p> <p>Development at broad location T2 could have a positive effect on flood risk by reducing the non-porous area of hardstanding.</p> <p>The greatest flood risk under this scenario arises from the as yet unallocated residual development which accounts for over a fifth of the residential development to be provided over the plan period. Since this development is concentrated over the latter half of the plan period it constitutes nearly forty percent of the development over ten years. While there is</p>	

SA Objective/Indicator	Commentary	Performance
	<p>potential for this residential development to be accommodated in the areas of search put forward for consideration under this scenario, it is likely that this would have a negative impact on flood risk, especially within location G1. With regards to this objective, the approach most likely to secure positive impacts would be concentrating the residual development in a discrete number of alternative broad locations which could be masterplanned to avoid areas at risk of flooding and which could secure SUDs technology is implemented to have a positive impact on the level of attenuation and storage of surface water as a result of the development.</p>	
<p>5. Natural Environment How will this scenario impact on the quality of natural resources: Landscape, Soil, and Water</p>	<p>Short term The urban development element of this scenario relies heavily on regeneration and brownfield sites to deliver development; the majority of the new built form would therefore be within an essentially urban landscape and would have little impact on existing landscape character of urban fringes compared to the other scenarios. Development in rural areas would be expected to be situated to minimise landscape impacts, however there is potential for rural development to impact negatively on the landscape. The landscape impacts of development at the broad locations is expected to be more apparent in the latter half of the plan period.</p> <p>Contaminated sites being brought forward under this scenario would require decontamination. The JCS is expected to require all major development proposals to be accompanied with stringent environmental management strategies and plans which will ensure protection and mitigation of the environment and resources during construction.</p> <p>Long term The landscape sensitivity of each of the broad locations put forward for development by this scenario is considered in turn:</p> <p>Broad Locations G1 This location is considered to have an overall low sensitivity. Development at this location will impact upon the existing settlements of Longlevens and Innsnorth as well as neighbouring areas of Gloucester. The character and relationship of new development needs to be considered against the existing settlements to ensure that identities are maintained where possible.</p> <p>Broad Location G4 This location is considered to have an overall low sensitivity. Development at this location will impact upon the existing settlements of Brockworth as well as neighbouring areas of Gloucester. The character and relationship of new development needs to be considered against the existing settlements to ensure that identities are maintained where possible. Development at this location would need to consider the existing land topography and</p>	<p>GREEN/ AMBER</p>
		<p>AMBER</p>

SA Objective/Indicator	Commentary	Performance
	<p>neighbouring built form whilst respecting and retaining the strong green corridor and historic influence. Provided these points are designed and considered from the outset then the existing surrounding character could be retained within the landscape. Application of a careful master planned approach development on this site at the level envisaged could be accommodated without having an adverse impact on this objective.</p> <p>Broad Location G9</p> <p>This location has an overall landscape sensitivity rating of medium to high. The area forms part of the greenbelt dividing Innsworth and Churchdown from the larger expanse of Gloucester city. It has four main communication routes in and around it which connect the outer villages to the larger conurbation. These busy routes have views which are likely to be the key visual receptors of this area. Any development within this site will have the advantage of having the existing urban form encompassing the built form, therefore the scope of mitigation would be low. However, the value of this landscape lies within its function of providing a visual divide between the city and the two villages.</p> <p>Broad Location C3</p> <p>This location is not identified as having any great sensitivity value in the wider landscape. The area is predominantly a flat, agricultural landscape with very little visual, ecological and cultural qualities. There are opportunities for enhancement through the creation of green corridors, following the River Swilgate and Wyman's Brook to the north west which would also act as mitigation for the development of this area. This could also link to the integration with the proposed Severn Vale Regional Park.</p> <p>Broad Location C6</p> <p>The landscape at south Cheltenham is sensitive and would require careful consideration, not least because of the potential impact on the AONB. However, the edge of escarpment location gives this area a great opportunity to provide green corridor linkages into the AONB. This could help to enhance the setting for new residents and help mitigate the loss of some of this landscape for existing local residents while also softening the impact of any development when viewed from the edge of the escarpment.</p> <p>Broad Location T2</p> <p>This location encompasses a large area of brownfield land of low landscape value; its redevelopment is likely to have a positive impact on the landscape quality, provided the wider landscape setting is considered as part of the masterplanning and design process.</p> <p>In common with other objectives, the greatest risk to the landscape under this scenario arises</p>	

SA Objective/Indicator	Commentary	Performance
	<p>from the as yet unallocated residual development. There is potential for this residential development to be accommodated in the broad locations with the lowest landscape impact, namely G1, G4, C3 and parts of T2. This would have the benefit of limiting the landscape change to a few areas which is likely to have the most positive effect on this objective. Alternatively the residual development could be located in a discrete number of alternative broad locations selected for their low landscape impact, namely within broad location C5.</p> <p>In terms of water usage and quality Scenario C is for a medium level of growth and is therefore likely to perform reasonably well against the need to ensure that water abstraction, run-off and recharge are kept within carrying capacity. However, this will need to be ascertained in discussions with infrastructure providers and public bodies. There is some potential for negative impacts on water quality within the Severn Estuary SAC as a result of the JCS but the full impact would need to be assessed by the HRA.</p>	
<p>6. Natural Environment How will this scenario impact on the objective to minimise the use of our natural resources including soil, water and best and most versatile/Greenfield land?</p>	<p>Short term This scenario offers the opportunity to reuse/recycle brownfield waste material on site. In the earlier stages of the plan the impact on existing agricultural land or green field sites will be minimised as the majority of development will be focused on brownfield sites in existing urban areas.</p> <p>The majority of development requires a water supply placing demand on both supply of clean water and infrastructure to process waste water and sewage.</p> <p>Long term The loss of agricultural land is inevitable within this scenario as development within the broad locations is on predominantly greenfield land, the majority of which is agricultural. However, in accordance with the sequential approach for minimising the loss of the best and most versatile agricultural land quality this scenario would result in the loss of lower grade land where possible.</p> <p>Broad Location G1 contains some Grade 1 and Grade 2 agricultural land. Development within this location would be on predominantly Grade 3 land but due to flood constraints development is likely to be limited to the southern areas of the floodplain; this would be likely to lead to the loss of some Grade 1 agricultural land unless masterplanning made the provision of open space/allotments on this area.</p> <p>Broad Location C3 contains some Grade 1 agricultural land and therefore its loss to development would have detrimental impact on this objective. However, the scale of development anticipated at this broad location would mean that a relatively large area of the Grade 1 agriculture land at the far west of the site could remain untouched. Provided</p>	<p>AMBER</p>
		<p>AMBER</p>

SA Objective/Indicator	Commentary	Performance
	<p>opportunities are taken to ensure that some of the high grade agricultural land can be retained within development for allotments, community gardens/orchards, etc., the negative impact can be mitigated.</p> <p>This scenario involves a greater uptake of greenfield land than Scenario A and B but less than Scenario D. The land take associated with the large residual development anticipated under this scenario would need to be carefully masterplanned to ensure that development on Grade 1 and 2 agricultural land was avoided wherever possible.</p> <p>The majority of new development requires a water supply, placing demands on supplies of clean water and the infrastructure to process waste water and sewage. However, this scenario anticipates medium levels of population growth in comparison with scenarios D thus reducing the overall consumption of natural resources.</p>	
<p>7. Historic Environment How will this scenario impact on the objective to protect and enhance the heritage and character of the JCS area?</p>	<p>Short term New development in the Gloucester urban area will help promote urban regeneration and provide opportunities for reuse/regeneration of historic sites around the City. The Cheltenham Task force sites will help to fill gaps in existing urban form linking together development across the Regency Town. Development within Tewkesbury Master Plan area will aid vitality and vibrancy of the Town.</p> <p>The distribution of development across the rural area would need to be carefully planned to ensure that the character of historic settlements is retained.</p>	<p>AMBER</p>
	<p>Long term It is expected that the JCS will contain design policies to ensure new development respects and, where possible, enhances the historic environment. This is particularly pertinent to Cheltenham where the drive to reuse brownfield land in the urban area already places pressure on the borough's cultural heritage.</p> <p>Within the Broad Locations there are listed buildings at Twigworth but these would not be detrimentally affected by any development proposal at this location. There could be a significant adverse affect at Broad Location G4; Brockworth Court lies in the centre and represents the ecclesiastical structure of society in the medieval period. It is considered essential to maintain an area of open landscape around these existing historic structures. 1,500 new homes on this narrow linear area could have a significant adverse impact on the setting and historical value of Brockworth Court, however if a smaller scale of development were to be considered, then the area could be more easily be developed in a manner which would not be detrimental to the setting of the historical buildings.</p>	<p>AMBER</p>

SA Objective/Indicator	Commentary	Performance
	<p>Broad Location C3 contains a number of archaeological features, and listed buildings, including a scheduled monument at Tredington. The level of development envisaged for this location can be accommodated without impacting on these historic features.</p> <p>Broad Location C6 has a strong sense of cultural heritage in spite of the proximity of the area to the urban edge of Cheltenham. The area's sense of place and history is particularly strong due to the presence of the moat and fishpond Scheduled Monument, and historic buildings in the vicinity and the presence of surviving ridge and furrow to the east. However the level of development envisaged on this site mean that it will be difficult to avoid any detrimental impact on the historic environment. A smaller scale of development could more easily accommodate retention of the historic features.</p> <p>The residual development required under this scenario could be contained within the broad locations put forward for development but dependent on the sensitivity of the area could have potentially negative impacts on this objective. For example, further development could be accommodated within locations C3 and T2 with little or no negative impacts on the historic environment.</p>	
<p>8. Sustainable Transport How well will this scenario reduce the need to travel and promote more sustainable transport choices and achieve a modal shift to public transport, cycling and walking.</p>	<p>Short term By concentrating development within existing urban areas and peripheral locations best use can be made of existing public transport infrastructure as well as encouraging sustainable modes of transport such as cycling and walking. The concentrations of development envisaged under this scenario at the broad locations make the provision of new public transport infrastructure easier to incorporate into the development at the planning stage.</p> <p>Encouragement for the use of sustainable modes of transport, such as public use bicycles and cycle lanes, has been secured through residential development. The opportunities for this type of infrastructure investment are moderate in line with the moderate level of development envisaged by this scenario.</p> <p>Long term The majority of the development envisaged at each of the Broad Locations will take place in the latter half of the plan period. Each of the locations is dealt with in turn:</p> <p>Broad Locations G1 and G3 Both these locations are adjacent to main transport routes and are considered accessible locations. As such, this scenario maximises the opportunities to both capitalise on existing public transport and increase the opportunities for a choice of means of access to goods and services for the people living in new homes in this area.</p>	<p>GREEN</p>
		<p>RED</p>

SA Objective/Indicator	Commentary	Performance
	<p>Broad Location G9 This area is well located close to the A40. In addition, the Old Cheltenham Road bisects the site from east to west. High frequency bus services between Gloucester and Cheltenham currently traverse the location. Development of this area could (provide a safe green infrastructure network linked into current pedestrian and cycle ways. This location is ideally situated to encourage a modal shift away from the use of the private car.</p> <p>Broad Location C3 This area is well connected to Cheltenham by public transport. High frequency bus routes run along Tewkesbury Road and opportunities exist to support travel by non-car modes for the southern and central parts of the this broad location due to its proximity to the north-west periphery of Cheltenham. There is also the potential to include a park and ride facility here, this reducing congestion and associated air pollution in the town centre but may not reduce the number of car based journeys.</p> <p>Broad Location C6 Significant opportunities exist at this location to support travel by non-car modes given the close proximity to the South western periphery of Cheltenham and existing public transport. A network of footpaths provides good connections to the urban edge.</p> <p>Broad Location T2 This location is a considerable distance from Tewkesbury town centre; however it is well connected to highway infrastructure. There are frequent public transport services through adjacent Northway into both Tewkesbury and Cheltenham town centres with good potential to extend the public transport network into this broad location and to provide some pedestrian and cycling links. However, the high level of employment land already existing and envisaged at this location combined with the relatively low number of residential units may increase in-commuting from the surrounding area. This will have an extremely negative impact on this objective as the majority of these journeys are likely to be by private car. However, it should also be noted that the brownfield site currently used as employment space by the MOD forms a significant part of this broad location. Approximately 630 people are employed on the MOD site; therefore there may be no net increase in the number of in commuting journeys.</p> <p>A protected potential freight railhead exists within this broad location, which should be explored as part of any development at this location. Development at broad location T2 offers opportunities to enhance the station at Ashchurch and frequency of train services serving the</p>	

SA Objective/Indicator	Commentary	Performance
	<p>This could improve the attraction of rail for commuting to the other main centres for both new and existing residents and could make rail freight a viable alternative for both the existing and proposed businesses within and surrounding this location.</p> <p>All the broad locations envisaged for development under this scenario offer significant opportunities to implement more sustainable transport choices. The medium level of development means that congestion may become an issue.</p> <p>There is potential for either a positive or negative impact on this objective as a result of the residual development envisaged under this scenario. If the development is dispersed across the rural area there is likely to be a negative impact as the provision of public transport in these areas is often problematic without significant public subsidy. If the residual development is concentrated in locations adjacent to existing public transport infrastructure, closer to urban centres, then the provision of public transport and access to services by walking and cycling is less of an issue and may result in a positive impact on this objective.</p>	
<p>9. Waste and Pollution How will this scenario help minimise waste created during construction and in use, and reduce light, air, noise pollution?</p>	<p>Short term There will be opportunities to reuse and recycle materials on brownfield sites, particularly where existing structures are demolished. The contribution that new urban development makes to light pollution is likely to be negligible. The amount of light pollution in rural areas is likely to be greater due to the darker skies experienced there; the distribution pattern of development to existing settlements will be the biggest determinant of this impact and cannot be assessed at this stage.</p> <p>Long term Waste, light, air and noise pollution when the development is in use will be dependent on the masterplanning of individual sites and whether or not new development is built to the highest environmental standards. It is expected that the JCS will contain policies with regard to sustainable construction and masterplanning. The feasibility of using waste for energy when planning for large scale developments could also be investigated.</p> <p>The greater the number of households in the area, the greater the likelihood of increased waste arising overall. Providing space to store recyclable materials within developments and provision of recycling centres can help encourage more sustainable habits among the population and may reduce waste arising per capita. The provision of recycling facilities this needs to be integrated into careful masterplanning.</p> <p>Broad Location T2 may contain contaminated land; its redevelopment could therefore have a potential positive impact on this objective.</p>	<p>GREEN</p>
		<p>GREEN/ AMBER</p>

SA Objective/Indicator	Commentary	Performance
<p>10. The economy How well will this scenario help to ensure the availability of employment land, encourage inward investment and support existing businesses?</p>	<p>Short term In the early stages of the plan the focus for development under this scenario is within the urban areas where employment land is limited to existing permissions and allocations. Current forecasts suggest circa 40ha of additional B Class employment land is required across the JCS area to accommodate anticipated employment growth of approximately 4% in B Class jobs over the plan period. However, this land requirement is allied to an element of “spaceless” growth wherein approximately 10% growth of all B1(a/b) and B8 sector jobs takes place without the need for additional floorspace due to space management efficiencies. This accounts for approximately 1% of the total growth anticipated over the plan period.</p> <p>In the short term “spaceless” growth may allow growth in B1(a/b) and B8 sector jobs as will the take up of existing permissions and allocations. B2/B1(c) sector jobs are set to decrease by an average of 19% across the JCS area which will also free up a certain amount of floorspace.</p> <p>In common with Scenarios B and D there may be a certain lag in the development of employment sites within the broad location areas under this scenario. This may mean that employment led development opportunities come forward in the short term within the urban areas but further inward investment and expansion of existing businesses is delayed as land availability is limited.</p> <p>Long term Current forecasts suggests circa 40ha of B Class employment land is required across the JCS area to accommodate anticipated employment growth of approximately 4% in B Class jobs over the plan period. This land requirement is provided by this scenario in common with scenarios B and D.</p> <p>While 1% of the anticipated 15% growth in jobs is expected to be achieved without a net increase in floorspace, 14% is land dependent. The anticipated further diversification of the economy into non B Class uses accounts for over 11% of the anticipated growth, however the land requirements for this have not been taken into account by this scenario. This non B class growth in areas such as construction, hotels and catering and retail will have some associated land requirements which will need to be provided for. Should the as yet unallocated residential residual be located within the broad locations, there will be limited potential for the land requirements of the non b class growth to be accommodated within these areas due to the higher level of development envisaged by this scenario.</p> <p>The medium level of residential development proposed under this scenario is likely to see the JCS start to become an area with reasonable levels of housing affordability; by the end of the</p>	<p>RED/ AMBER</p> <p>AMBER</p>

SA Objective/Indicator	Commentary	Performance
	<p>plan period approximately half of all people are expected to be able to meet the cost of purchasing a home. This is likely to support the economic health and prosperity of the area as the JCS area is likely to a more attractive place for relocation and start up of new businesses.</p>	
<p>11. City and Town Centres How well will this scenario ensure the continued vitality and viability of the city and town centres and retail, service, leisure and learning destinations?</p>	<p>Short term In the early part of the plan period this scenario is likely to have a positive impact on ensuring the continued vitality and viability of city and town centres as the majority of new development will be concentrated in the main centres.</p> <p>Long term In common with Scenarios B and D this scenario is expected to see a modest level of population growth across the JCS area. However, this masks an expected decrease in population in the 25-59 age group in both Cheltenham and Tewkesbury Boroughs. It appears that under this scenario Cheltenham Borough struggles to attract working age people who would support the vitality and viability of the centre and local leisure facilities.</p>	GREEN
<p>12. Sustainable Communities How will this scenario contribute towards the need to reduce inequalities in wellbeing and offer opportunities for all?</p>	<p>Short term The main influences exerted by the JCS on this objective are linked to access to affordable housing, health and education. The urban intensification under this scenario is likely to secure access to health and education services by a choice of means of transport. The medium level of development envisaged outside the urban area means that the levels of people making use of services should secure existing services and enhance services where necessary. During the initial half of the plan period the net newly arising affordable housing need is expected to fall significantly in all three districts. This means that, in the short term, more people will be able to access affordable housing that meets their needs. Under this scenario the backlog need for affordable housing also falls in the early half of the plan period.</p> <p>In order to bring forward a sustainable community within broad location T2, it is likely to be necessary to provide substantial investment in community infrastructure including a community centre and primary healthcare due to the distance and accessibility of this area to Tewkesbury town centre. It is debatable whether the modest level of homes would be sufficient to secure this level of community infrastructure when site remediation costs are taken into consideration. There may be scope for some of the residual development required by this scenario to be accommodated within area T2 enabling a more sustainable community to be developed at this location.</p>	AMBER
	<p>Long term The medium level of development envisaged outside the urban area means that the levels of people making use of services should secure existing services and enhance services where necessary.</p>	AMBER

SA Objective/Indicator	Commentary	Performance
<p>13. Sustainable Communities How will this scenario help improve community safety and reduce levels of crime and the fear of crime?</p>	<p>Short term The balance between residential development proposed in the existing urban areas and broad locations is skewed in favour of development in the latter. While the urban development will lead to a more dense urban fabric with a higher population density and greater opportunities for passive surveillance there is a risk that residential units in inner urban area remain unoccupied when there exists a greater choice for homes in suburban locations. The provision of dwelling units within existing town and city centres will help reduce fear of crime particularly in the evening as footfall and passive surveillance diversifies away from the patrons of pubs and clubs. Opportunities exist for new development to employ 'secure by design' principles to design out potential crime hotspots in the built environment.</p> <p>Long term The increased number of lone person households, and particularly lone elderly households predicted under all four scenarios is likely to lead to increased fear of crime within the JCS area. This scenario may exacerbate this fear as the level of development may lead to a sluggish housing market which no longer allows people under occupying their homes to move into smaller or purpose built units where they may have greater contact with others. Lone people under occupying larger units may also be targeted by criminals due to the perception that they are easier targets.</p>	GREEN
<p>14. Health How well will this scenario perform against the objective to improve access for all to health facilities and to promote healthy lifestyles:</p>	<p>Short term The focus on urban intensification and development in the early part of the plan period is likely to see the redevelopment of a number of regeneration sites within the urban areas. Therefore the aspiration to deliver a new City Centre primary health care facility as part of the regeneration of the Greyfriars site in Gloucester is likely to come to fruition which will help to improve access to health care facilities for residents of Gloucester City Centre.</p> <p>The developments envisaged under this scenario will be generally well located to maximise walking, cycling and public transport opportunities to access goods and services. The level of development envisaged should also support enhanced sport and leisure facilities in the urban areas. However, the modest amount of development envisaged for the rural areas will make it difficult for communities to secure funds for upgraded sport and leisure facilities and for health and leisure services to remain viable. There may be scope for some of the residual development envisaged under this scenario to be allocated to rural areas to help secure rural services.</p> <p>Long term This scenario sees both the backlog of need for affordable housing and the net newly arising need for affordable housing fall during the middle of the plan period before rising again. A lack of affordable housing may lead to an increase in the number of households unsuitably housed with higher incidences of overcrowding, concealed households and hidden</p>	GREEN/ AMBER
		AMBER

SA Objective/Indicator	Commentary	Performance
	<p>homelessness; all of which have negative mental health impacts.</p> <p>Residential development within broad locations G1 & G4 would require enhanced primary health care to the north and east of Gloucester which may result in better provision for those already living in the Innsworth/Longlevens & Brockworth areas.</p> <p>The level of development at envisaged at broad location C3 will require enhanced primary health care infrastructure to the west of Cheltenham which is likely to result in better provision for existing communities at Swindon Village and Uckington. The lower level of development envisaged within location C6 should be absorbed into the existing health care infrastructure to the south of Cheltenham.</p> <p>The aspiration to secure improved primary health care facilities within Tewkesbury town centre is supported by this scenario as the level of development envisaged will contribute to funding of the facilities. However, the distance of the proposed facilities from broad location T2 may mean that health funding for GP or dental services is a higher priority.</p> <p>The high level of residual development under this scenario will require careful planning in terms of healthcare access. There may be scope for more development to be accommodated within some of the broad locations currently proposed for development – particularly within C3 where new healthcare facilities would already be required.</p>	
<p>15. Housing How well will this scenario perform against the objective to ensure that everyone has access to a decent home that they can afford and meets their need?</p>	<p>Short term During the initial half of the plan period the net newly arising affordable housing need is expected to fall significantly in all three districts. This means that, in the short term, more people will be able to access affordable housing that meets their needs. In addition the level of development anticipated means that the backlog need for affordable housing is also addressed under this scenario and begins to decrease.</p> <p>Long term The number of people able to afford to buy increases under this scenario with approximately half of all people being able to afford a home by 2031. This is likely to have a positive impact on affordability and access to housing. The percentage of affordable housing required will increase in both Gloucester and Cheltenham Borough but there is likely to be a fall of 22% across Tewkesbury Borough. The proportion of people expected to be able to meet market level rents remains approximately stable over the plan period under this scenario.</p> <p>Under this scenario the household to dwelling ratios show that the number of households will exceed the available housing within Gloucester and Cheltenham Borough but will fall in</p>	<p>GREEN</p> <p>AMBER</p>

SA Objective/Indicator	Commentary	Performance
	<p>Tewkesbury Borough by the end of the plan period.. As household numbers exceed available dwellings then concealed households are necessarily created. This shortfall of available housing is likely to exert upward pressure on house prices and market rents – with demand exceeding supply.</p> <p>In common with Scenario A, house price inflation is expected to be more rapid in the later part of the forecast period with a 19% increase in median house price between 2021 and 2031, compared to an 11% increase in the first decade of the forecast period. This will have an impact on affordability and see fewer people being able to afford to buy; which may further drive up the cost of market rents.</p> <p>The level of development planned for the broad locations areas mean that with careful masterplanning there should be opportunities to plan for the increase levels of aged population in terms of sheltered or extra care housing.</p>	
<p>16. Green/Open Space Will this scenario protect and improve access to public green and open space and/or offer opportunities to create and enhance new open space, along with providing a network of green and open space?</p>	<p>Short term There are good opportunities to introduce green infrastructure and enhance open and green spaces both within the urban areas and in the peripheral locations with this modest level of development. However, in common with all the scenarios, there is a risk that the level of development envisaged within the existing urban area may reduce the level of green and open space within the urban fabric.</p> <p>Long term In the latter part of the plan period the majority of development is concentrated in the broad locations. Each of the locations is dealt with in turn.</p> <p>Broad Location G1 Development of this area could have an extremely positive impact on this objective. Part of location G1 is in floodplain and the provision of strategic SuDS can also be used to create strategic green infrastructure and help create a network of greenspace. This will need to be carefully masterplanned into the design of the overall development at a very early stage.</p> <p>Broad Location G9 This area contains important undeveloped greenspace. There will be opportunities through good design to increase access to this greenspace. Through careful masterplanning a green infrastructure network and the provision of some public green space along the northern border of this area could maintain a degree of separation between Innsworth, Churchdown and Gloucester.</p> <p>Broad Location C3</p>	<p>AMBER/ GREEN</p> <p>GREEN/ AMBER</p>

SA Objective/Indicator	Commentary	Performance
	<p>There are currently allotments within area C3, these will need to be protected, and in addition opportunities should be sought to include community gardens/allotments in new development in an attempt to mitigate against the loss of any high grade agricultural land. However, the level of development envisaged in this area should not encroach on the high grade agricultural land present.</p> <p>Broad Location C6 There is currently a significant amount of green and open space close to this area. There are large sports fields at Leckhampton, as well as allotments and public pathways linking the area into Cheltenham. Development of this area will offer significant opportunities to enhance access to open space provided this is carefully masterplanned at the early stages.</p> <p>Broad Location T2 A significant part of this area consists of hardstanding. There are opportunities here to create green and open spaces as part of any development and also to create links to the adjacent open countryside.</p> <p>This scenario maximises the opportunities to enhance green infrastructure in line with the higher levels of contribution that can be generated from the higher levels of development envisaged.</p> <p>The as yet undesignated residual development associated with this scenario carries a low to moderate risk of a negative impact on this objective. The main risk arises if the residual development were to be shared among the broad locations already proposed for development; it would then be a much harder task to incorporate green space into the designs at the masterplanning stage.</p>	
<p>17. Education and Skills How well will this scenario help ensure access to education for all (including lifelong learning and skills enhancement)?</p>	<p>Short term Existing schools will be able to accommodate children from the residential development expected in the urban areas under this scenario. Moreover, residents of the development within the urban areas will be able to access existing public transport routes to gain access to existing FE colleges at campuses in both Gloucester and Cheltenham.</p> <p>Opportunities for adult education are accessible at both Gloucester and Cheltenham with public transport options along arterial highways between the main centres and from Tewkesbury and Bishops Cleeve. Adult education opportunities are limited within the Tewkesbury/Ashchurch urban area and urban intensification will do little to address this.</p> <p>Existing schools would absorb increased pupil numbers until new facilities provided for</p>	<p>AMBER/ RED</p>

SA Objective/Indicator	Commentary	Performance
	<p>primary aged children at broad locations G1, C3 and T2.</p> <p>Long term Cheltenham and Gloucester currently offer very good education and training opportunities catering for all ages and levels of educational attainment. The situation in Tewkesbury is less positive in terms of adult education provision.</p> <p>With the exception of T2, the peripherality of the proposed broad location sites to the main urban areas centres along with good public transport opportunities means that future residents of the broad locations could easily access a good range of education and skills training facilities. In particular G4 offers excellent access to education and skills development. There are a number of nursery and primary schools close to the area which is also in close proximity to Brockworth Enterprise and Community Comprehensive School and Business College.</p> <p>Location T2 is within fairly close proximity to Ashchurch Primary School (20 minute walk). There is a large secondary school at Tewkesbury cannot be considered to be within a 20 minute walking distance. There is a shortage of adult skills and education facilities in Tewkesbury, although Cheltenham's facilities are easily accessible by public transport.</p> <p>There is a risk under that the level of development at each of the broad locations is insufficient to trigger developer contributions to the level of education provision necessary to ease the strain on existing facilities. Under this scenario there is scope for some of the residual development to be incorporated into the broad locations proposed which may secure contributions for enhanced facilities.</p>	<p>AMBER/ RED</p>
<p>18. Culture and Tourism How will this scenario perform against the objective to protect and enhance our cultural heritage and promote sustainable tourism?</p>	<p>Short term This scenario offers a greater level of opportunity to enhance the historic heritage of Cheltenham and Tewkesbury Boroughs than scenarios A and B in line with the higher levels of contribution that can be generated from the higher levels of development.</p> <p>Opportunities for Gloucester to continue to secure vitality and vibrancy of the City Centre as part of the heritage led urban regeneration are likely to continue under this scenario.</p> <p>Long term In common with all the scenarios there is a risk of changes to the character of the existing built form of Cheltenham Town owing to increased demand to build on existing vacant spaces, this in turn may impact on the tourism industry as the character and form of the town changes.</p>	<p>AMBER</p>
		<p>AMBER</p>

SA Objective/Indicator	Commentary	Performance
	<p>The landscape of the JCS is one of the major attractants for tourists to the area. There is a risk that the location of the residual development envisaged under this scenario has a negative impact on the landscape with associated impacts on the attractiveness of the area. In addition the rural residential development has not been attributed to individual villages and there is a risk that unsympathetic development could harm the character and/or setting of particularly sensitive villages.</p> <p>Under this scenario a 70% increase in the over 60s population is anticipated, this may result in urban centres being perceived as retirement locations rather than places for young adults to visit or relocate to.</p>	

Scenario D

Development Scenario D – 110% Demographic	No. of homes
Base Capacity Plus Windfalls Gloucester Area	8400
Base Capacity Plus Windfalls Cheltenham Area	4300
Base Capacity Plus Windfalls Tewkesbury/Ashchurch Urban Area	500
Base Capacity Tewkesbury Rural Areas	600
1. Base Capacity Total	13,800
2. Rural Areas Total	2,400
Broad Location G1	3100
Broad Location G4	1500
Broad Location G9	750
Broad Location C3	4450
Broad Location C6	1300
Broad Location T2	2100
3. Broad Location Total	13,200
DEVELOPMENT TOTAL	29,500
Development Target	40,500
Residual Development Requirement	11,000

NB. Figures have been rounded to the nearest hundred

Summary

In addition to the land already within the existing supply either as existing permissions, allocations or windfall development this scenario anticipates a further 13,200 dwellings being brought forward together with circa 40ha of employment land in a number of broad locations adjacent to the existing urban areas of Gloucester, Cheltenham and Tewkesbury/Ashchurch. Within the rural areas, 2400 homes are to be delivered at a rate of 120 per annum over the plan period. In addition to this a further 11000 homes will be delivered in locations that will be specified as the JCS develops. The rate of delivery under this scenario aims to meet the needs of 110% of the projected population to 2031. This scenario anticipates that 60% of the overall development will be delivered in the latter half of the plan period.

This scenario is likely to be of lower environmental sustainability than the other scenarios due to the higher level of development envisaged despite its initial focus on the existing urban area. Although there is potential for some loss of biodiversity due to redevelopment of long term brownfield land these impacts can generally be mitigated. Impacts on the European sites within and adjacent to the JCS area are more likely under this scenario than for Scenarios B and C due to the higher level of development; for Scenarios B, C and D these effects are most likely to arise from development within broad locations G1, C3 and T2. There are some potential negative impacts to both biodiversity and access to green and open space under this scenario dependent on how the residual development is distributed. The impact on flooding is likely to be balanced under this scenario. The levels of development currently envisaged within the broad locations could be accommodated within areas not affected by flooding and careful use of SUDs could mean that surface permeability is maintained. Positive environmental impacts under this scenario are contingent on the residual development being accommodated in such a way as to maintain biodiversity, green and open space and avoiding flood prone areas. Although there is scope for some additional development in the majority of the broad locations only C3 and T2 can be recommended to accommodate additional development from the residential residual at this stage, although this is subject to appropriate landscape mitigation. In addition broad locations C5 and C2 may also accommodate some of the residential residual with few negative effects on biodiversity and flooding. Development within the broad locations offers opportunities to make best use of existing public transport links to the urban centres.

Significant decreases are anticipated to the net newly arising need in affordable housing in the first fifteen years of the plan period, however the requirement for affordable housing will rise by a modest amount in both Gloucester City and Cheltenham Borough but is likely to fall by approximately a fifth across Tewkesbury Borough. The level of people able to meet the cost of both market rents and 'affordable rent' products remain approximately stable over the plan period under this scenario, in addition The number of people able to afford to buy increases under this scenario with approximately half of all people being able to afford a home by 2031. This will have positive impacts on ensuring that everyone has access to a decent home at a price they can afford. The level of development envisaged by this scenario is likely to secure the continuation of existing services and secure new services where required. With the exception of C6, the levels of development envisaged at the broad locations would be likely to require enhanced healthcare facilities which could result in better access to healthcare for the surrounding populations. Broad location T2 could accommodate additional development from the residential residual which may make the development more sustainable with regard to access to services.

In the early part of the plan period a degree of economic growth can be secured due to “spaceless” growth and accommodated through existing allocations and permissions. In the mid and latter half of the plan period, employment land will need to be provided within the broad locations. In common with Scenarios B and D there may be a certain lag in the development of employment sites within the broad locations. This may mean that employment led development opportunities come forward within the urban areas but further inward investment and expansion of existing businesses is delayed for a short time. A large proportion of the economic growth over the plan period is predicted to be in the non B class sectors such as retail, tourism and construction. There are land requirements associated with these sectors that it will be difficult to meet within the broad locations proposed for development if the residual requirement for residential development were also to be accommodated in these areas.

Suggested locations for residual development

G3 – but sensitive to landscape considerations

Southernmost areas of C2c, C2d

C5

T2 – but sensitive to landscape considerations to the north of the site

SA Objective/Indicator	Commentary	Performance
<p>7. Biodiversity Overall likely biodiversity impact?</p>	<p>Short term The mixture of green and brownfield development envisaged by this scenario offers the opportunity for biodiversity improvements on brownfield sites coupled with possible losses to biodiversity on greenfield sites. Brownfield redevelopment may offer the opportunity for biodiversity improvements on central area sites, however some long term brownfield sites may have some biodiversity value that could be maintained; in all cases the approach to biodiversity needs to be planned into new development proposals at the earliest possible stage. During construction there could be adverse impacts on biodiversity value. However, it is expected that the JCS will contain a policy requiring all major development proposals to be accompanied by an environmental management plan which would identify any potential negative impacts and provide avoidance and mitigation strategies.</p> <p>The JCS is likely to have “in combination” effects on a number of European sites that lie either within, or in close proximity to, the JCS area. These include possible direct effects from construction on the Cotswold Beechwoods and Dixton Wood SAC. These impacts will be predominantly due to development at broad locations T2 and G1 but may also arise from the residual residential development dependent on its location.</p> <p>Long term Development within the broad locations could, with carefully masterplanning, provide for significant improvements to local biodiversity value. The impact on biodiversity at each of the broad locations is considered in turn:</p> <p>Broad Location G1 The Innsworth Meadow SSSI (considered to be in unfavourable/recovering position) is situated in the centre of this broad location, without intervention measures this SSSI will continue to decline long term due to isolation from like habitat. A small area of Lowland Meadow BAP is situated to the centre of the site. Coastal and floodplain grazing marsh BAP is situated along the western site boundary, however because this is also a flood constraint area and strategic SuDS will need to be implemented, sympathetic development of G1 could have a positive impact on BAP habitats. Development of this site offers opportunities to introduce proactive management of the SSSI and also reconnect it to the wider habitat. The impact on this objective is therefore uncertain, it would be dependent on how well biodiversity and habitat protection and enhancement are integrated into the detailed masterplans for the site.</p> <p>Broad Location G4 This area contains no biodiversity/habitat designations although it does contain a small</p>	<p>GREEN/ AMBER</p> <p>GREEN/ AMBER</p>

SA Objective/Indicator	Commentary	Performance
	<p>remnant orchard off Brockworth Lane and an orchard off the A46. In addition there is useful habitat along the Horsbere Brook. Retention of the orchards, along with maintenance and enhancement of a linear riparian strip along the brook, could lead to significant biodiversity improvements resulting from development of this site. However, the 1,500 new units suggested for this area, is expected to make retention of these features problematic.</p> <p>Broad Location G9 This area is poor in biodiversity. It is isolated by development and road infrastructure with no connection to other habitat. It is predominantly intensively farmed. A mature hedgerow along the B4063 and perhaps the ditch line could be readily incorporated into any development envisaged at this location. Biodiversity levels could be improved with development of this site, provided making space for wildlife is incorporated at an early stage of the development.</p> <p>Broad Location C3 This area contains no biodiversity/habitat designations. Its current biodiversity quality has been deemed low to moderate although the area does contain a number of protected species. Sympathetic development of sites within the broad location has potential for making space for wildlife and improvements in biodiversity value.</p> <p>Broad Location C6 This area contains a good mosaic of habitat types and biodiversity which could make mitigation difficult. The dominant land use is grazing, which has potentially higher ecological value in comparison to more intensively managed agricultural land. The impact of development would be negative but there are opportunities for enhancement through the creation of green corridors.</p> <p>Broad Location T2 The south of this area has no biodiversity/habitat designations, as it consists of a brownfield site with a significant amount of hardstanding. Development of this area could offer some significant enhancement of biodiversity/habitat features provided making space for wildlife is included in development proposals at an early stage.</p> <p>The JCS is likely to have “in combination” effects on a number of European sites that lie either within, or in close proximity to, the JCS area. These include possible long term effects from air pollution from traffic on Cotswold Beechwoods and Rodborough Common SACs, recreational damage and disturbance on Cotswold Beechwoods and Severn Estuary SACs, effects on water quality and levels on the Severn Estuary and River Wye SACs and impacts on bat foraging areas and flight lines on Wye Valley and Forest of Dean Bat Sites SAC. The</p>	

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	<p>scale of these impacts will be minimised by this scenario compared to the others due to the lower level of development envisaged under this scenario. These impacts will be predominantly due to development at broad locations G1, T2 and C3 but may also arise from the residual residential development.</p> <p>While the majority of urban sites included under this scenario are brownfield, some are not and their loss may have biodiversity implications. It should also be noted that some brownfield sites, particularly within the Tewkesbury/Ashchurch urban area and rural areas may contain unique habitats for wildlife and/or protected/endangered flora and fauna. Where this is the case it will be important to ensure that new development protects and/or mitigates against adverse impacts as far as possible.</p> <p>The greatest risk to biodiversity under this scenario arises from the as yet unallocated residual development which accounts for over a quarter of the residential development to be provided over the plan period. Since this development is concentrated over the latter half of the plan it constitutes nearly half of the development over that ten year period. While there is potential for this residential development to be accommodated in the areas of search put forward for consideration under this scenario, it is likely that this would have a negative impact on biodiversity. With regards to this objective, the approach most likely to secure positive impacts would be concentrating the residual development in a discrete number of alternative broad locations which could be masterplanned to avoid impacting on existing biodiversity and to provide enhanced habitats where possible. For example, parts of Broad Location C2 and C5 may be suitable for some development with few negative impacts on biodiversity.</p>	
<p>8. Climate Change Mitigation How will this scenario impact on greenhouse gas emissions?</p>	<p>Short term All new development is likely to increase greenhouse gas emissions in the short term due to the high embodied carbon in construction materials, particularly concrete and steel. The greater the amount of new development, the higher the carbon emissions from construction. This scenario is therefore assessed as having a medium negative impact compared to the other scenarios due to the medium level of development it envisages.</p> <p>Long term The amount of greenhouse gases emitted will increase due to new development; however the JCS is expected to contain sustainable construction policies which will seek to reduce greenhouse gas emissions through achieving high levels of energy efficiency and a requirement for renewable energy technologies to be incorporated into large scale development. The JCS is expected to require good design and sustainable construction techniques to lower carbon emissions in use and this will have a positive impact on the aim to reduce carbon emissions.</p>	<p>GREEN/ AMBER</p> <p>AMBER</p>

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	<p>The proportional relationship between the amount of new development and the level of carbon emissions from construction means that this development scenario will contribute medium to high levels of greenhouse gas emissions compared with the other development scenarios.</p> <p>NB. This objective does not include transport emissions which are assessed under Objective 8: Sustainable Transport. However, restricting the amount of new housing development could mean that in the long term people seeking accommodation may have to live out of the immediate area which would have negative impact on greenhouse gas emission arising from commuting.</p>	
<p>3. Climate change Adaptation</p>	<p>This objective is not assessed as part of the Scenario Testing. Flooding is considered separately and other climate change adaptation techniques will be a fundamental part of the design of individual developments.</p>	<p>and other developments.</p>
<p>4. Flooding How will this scenario impact on flood risk including risk to people and property</p>	<p>Short term Existing residential commitments will have already taken flooding into consideration. Allocations for residential development should be sequentially selected in accordance with Planning Policy Statement 25: Development and Flood Risk. Provided that construction activity does not lead to, or exacerbate, flood risk through contributing to the siting of watercourses due to activities such as wheel washing, there are no anticipated negative impacts on this objective in the short-term due to the development in the urban centres. It is anticipated that the JCS will require all major developments to be accompanied with an environmental management plan which will encompass both construction and in-use issues.</p> <p>Long Term The development of greenfield land under this scenario could see an increase in the negative impacts of flooding as existing attenuation and surface water storage opportunities may be reduced through development. However, careful planning of the development to incorporate SUDS and/or increased water holding capacity through the creation of balancing ponds or water features could result in a positive impact. Under this scenario development is skewed towards the latter half of the plan period which will allow appropriate upgrades to sewerage and drainage infrastructure to take place ahead of the development.</p> <p>This higher growth scenario can still be implemented without directing development towards areas of flood risk provided that the sequential approach for site selection is adhered to.</p> <p>Development that increases the amount of impermeable surfaces can result in an increase in surface water run-off, which in turn can result in increased flood risk both locally and elsewhere within the catchment area. Scenario D is likely to involve the largest land take of all the scenarios with an associated large increase in impermeable surfaces. The extent to which development impacts on flood risk will depend upon not only its location but also its</p>	<p>GREEN/ AMBER</p>
		<p>GREEN/ AMBER</p>

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	<p>design and the level to which SuD technologies are applied.</p> <p>The majority of the urban development under all scenarios is envisaged over the first ten years of the plan period and this relatively rapid development of sites within the urban area would need to take into account appropriate drainage upgrades to ensure that storm water is dealt with effectively. In addition some existing brownfield sites may contribute to attenuation in the urban area thus reducing surface water run-off.</p> <p>The flood impacts at each of the broad locations put forward for development but affected by flooding is considered in turn:</p> <p>Broad Location G1</p> <p>A significant proportion of this broad location lies within an area of high flood risk that bisects the site. Land to the south of high risk area near Innsworth may be more suitable for development than land to the north as the flood constraint naturally separates the site. The quantity of development envisaged for this location could easily be accommodated to the south of the floodplain. Development at this location will require the use of strategic suds. Careful masterplanning and infrastructure provision will need to be implemented to ensure any development on the most north-western parts of this site do not lead to increased flood risk or danger to human health.</p> <p>Broad Location C3</p> <p>This location contains some areas of high flood risk however the amount of development proposed can be accommodated on land within the broad location which is not constrained by flood risk. The main risk areas are within the upper reaches of the Hyde Brook (west of Brockhampton) & rural floodplain adjacent to the River Swilgate plus a residual risk of culvert blockage identified upstream of M5 culvert & along the Leigh Brook at Uckington. Important surface water flow routes are identified to the north and south of the site as a result of overland flow from adjacent hills.</p> <p>Development at broad location T2 could have a positive effect on flood risk by reducing the non-porous area of hardstanding.</p> <p>The greatest flood risk under this scenario arises from the as yet unallocated residual development which accounts for over a quarter of the residential development to be provided over the plan period. Since this development is concentrated over the latter half of the plan period it constitutes nearly half of the development over ten years. While there is potential for this residential development to be accommodated in the areas of search put forward for</p>	

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	<p>consideration under this scenario, it is likely that this would have a negative impact on flood risk, especially within location G1. With regards to this objective, the approach most likely to secure positive impacts would be concentrating the residual development in a discrete number of alternative broad locations which could be masterplanned to avoid areas at risk of flooding and which could secure SUDs technology is implemented to have a positive impact on the level of attenuation and storage of surface water as a result of the development.</p>	
<p>5. Natural Environment How will this scenario impact on the quality of natural resources: Landscape, Soil, and Water</p>	<p>Short term The urban development element of this scenario relies heavily on regeneration and brownfield sites to deliver development; the majority of the new built form would therefore be within an essentially urban landscape and would have little impact on existing landscape character of urban fringes compared to the other scenarios. Development in rural areas would be expected to be situated to minimise landscape impacts, however there is potential for rural development to impact negatively on the landscape. The landscape impacts of development at the broad locations is expected to be more apparent in the latter half of the plan period.</p> <p>Contaminated sites being brought forward under this scenario would require decontamination. The JCS is expected to require all major development proposals to be accompanied with stringent environmental management strategies and plans which will ensure protection and mitigation of the environment and resources during construction.</p> <p>Long term The landscape sensitivity of each of the broad locations put forward for development by this scenario is considered in turn:</p> <p>Broad Locations G1 This location is considered to have an overall low sensitivity. Development at this location will impact upon the existing settlements of Longlevens and Innsworth as well as neighbouring areas of Gloucester. The character and relationship of new development needs to be considered against the existing settlements to ensure that identities are maintained where possible.</p> <p>Broad Location G4 This location is considered to have an overall low sensitivity. Development at this location will impact upon the existing settlements of Brockworth as well as neighbouring areas of Gloucester. The character and relationship of new development needs to be considered against the existing settlements to ensure that identities are maintained where possible. Development at this location would need to consider the existing land topography and neighbouring built form whilst respecting and retaining the strong green corridor and historic influence. Provided these points are designed and considered from the outset then the</p>	<p>GREEN/ AMBER</p>
		<p>AMBER</p>

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	<p>existing surrounding character could be retained within the landscape. Application of a careful master planned approach development on this site at the level envisaged could be accommodated without having an adverse impact on this objective.</p> <p>Broad Location G9</p> <p>This location has an overall landscape sensitivity rating of medium to high. The area forms part of the greenbelt dividing Innsworth and Churchdown from the larger expanse of Gloucester city. It has four main communication routes in and around it which connect the outer villages to the larger conurbation. These busy routes have views which are likely to be the key visual receptors of this area. Any development within this site will have the advantage of having the existing urban form encompassing the built form, therefore the scope of mitigation would be low. However, the value of this landscape lies within its function of providing a visual divide between the city and the two villages.</p> <p>Broad Location C3</p> <p>This location is not identified as having any great sensitivity value in the wider landscape. The area is predominantly a flat, agricultural landscape with very little visual, ecological and cultural qualities. There are opportunities for enhancement through the creation of green corridors, following the River Swilgate and Wyman's Brook to the north west which would also act as mitigation for the development of this area. This could also link to the integration with the proposed Severn Vale Regional Park.</p> <p>Broad Location C6</p> <p>The landscape at south Cheltenham is sensitive and would require careful consideration, not least because of the potential impact on the AONB. However, the edge of escarpment location gives this area a great opportunity to provide green corridor linkages into the AONB. This could help to enhance the setting for new residents and help mitigate the loss of some of this landscape for existing local residents while also softening the impact of any development when viewed from the edge of the escarpment.</p> <p>Broad Location T2</p> <p>This location encompasses a large area of brownfield land of low landscape value; its redevelopment is likely to have a positive impact on the landscape quality, provided the wider landscape setting is considered as part of the masterplanning and design process.</p> <p>In common with other objectives, the greatest risk to the landscape under this scenario arises from the as yet unallocated residual development. There is potential for this residential development to be accommodated in the broad locations with the lowest landscape impact,</p>	

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	<p>namely G1, G4, C3 and parts of T2. This would have the benefit of limiting the landscape change to a few areas which is likely to have the most positive effect on this objective. Alternatively the residual development could be located in a discrete number of alternative broad locations selected for their low landscape impact, namely broad location C5 although this location has limited capacity.</p> <p>In terms of water usage and quality; Scenario D is for a high level of growth and is therefore likely to perform poorly against the need to ensure that water abstraction, run-off and recharge are kept within carrying capacity. However, this will need to be ascertained in discussions with infrastructure providers and public bodies. There is some potential for negative impacts on water quality within the Severn Estuary SAC as a result of the JCS but the full impact would need to be assessed by the HRA.</p>	
<p>6. Natural Environment How will this scenario impact on the objective to minimise the use of our natural resources including soil, water and best and most versatile/Greenfield land?</p>	<p>Short term This scenario offers the opportunity to reuse/recycle brownfield waste material on site. In the earlier stages of the plan the impact on existing agricultural land or green field sites will be minimised as the majority of development will be focused on brownfield sites in existing urban areas.</p> <p>The majority of development requires a water supply placing demand on both supply of clean water and infrastructure to process waste water and sewage.</p> <p>Long term The loss of agricultural land is inevitable within this scenario as development within the broad locations is on predominantly greenfield land, the majority of which is agricultural. However, in accordance with the sequential approach for minimising the loss of the best and most versatile agricultural land quality this scenario would result in the loss of lower grade land where possible.</p> <p>Broad Location G1 contains some Grade 1 and Grade 2 agricultural land. Development within this location would be on predominantly Grade 3 land but due to flood constraints development is likely to be limited to the southern areas of the floodplain; this would be likely to lead to the loss of some Grade 1 agricultural land unless masterplanning made the provision of open space/allotments on this area.</p> <p>Broad Location C3 contains some Grade 1 agricultural land and therefore its loss to development would have detrimental impact on this objective. However, the scale of development anticipated at this broad location would mean that a relatively large area of the Grade 1 agriculture land at the far west of the site could remain untouched. Provided opportunities are taken to ensure that some of the high grade agricultural land can be</p>	<p>AMBER</p>
		<p>AMBER</p>

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	<p>retained within development for allotments, community gardens/orchards, etc., the negative impact can be mitigated.</p> <p>This scenario involves the greatest uptake of greenfield land of all the scenarios. The land take associated with the large residual development anticipated under this scenario would need to be carefully masterplanned to ensure that development on Grade 1 and 2 agricultural land was avoided wherever possible.</p> <p>The majority of new development requires a water supply, placing demands on supplies of clean water and the infrastructure to process waste water and sewage. However, this scenario anticipates higher levels of population growth in comparison with the other scenarios and thus maximises the overall consumption of natural resources.</p>	
<p>7. Historic Environment How will this scenario impact on the objective to protect and enhance the heritage and character of the JCS area?</p>	<p>Short term New development in the Gloucester urban area will help promote urban regeneration and provide opportunities for reuse/regeneration of historic sites around the City. The Cheltenham Task force sites will help to fill gaps in existing urban form linking together development across the Regency Town. Development within Tewkesbury Master Plan area will aid vitality and vibrancy of the Town.</p> <p>The distribution of development across the rural area would need to be carefully planned to ensure that the character of historic settlements is retained.</p>	<p>AMBER</p>
	<p>Long term It is expected that the JCS will contain design policies to ensure new development respects and, where possible, enhances the historic environment. This is particularly pertinent to Cheltenham where the drive to reuse brownfield land in the urban area already places pressure on the borough's cultural heritage.</p> <p>Within the Broad Locations there are listed buildings at Twigworth but these would not be detrimentally affected by any development proposal at this location. There could be a significant adverse affect at Broad Location G4; Brockworth Court lies in the centre and represents the ecclesiastical structure of society in the medieval period. It is considered essential to maintain an area of open landscape around these existing historic structures. 1,500 new homes on this narrow linear area could have a significant adverse impact on the setting and historical value of Brockworth Court, however if a smaller scale of development were to be considered, then the area could be more easily be developed in a manner which would not be detrimental to the setting of the historical buildings.</p>	<p>AMBER</p>

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	<p>Broad Location C3 contains a number of archaeological features, and listed buildings, including a scheduled monument at Tredington. The level of development envisaged for this location can be accommodated without impacting on these historic features.</p> <p>Broad Location C6 has a strong sense of cultural heritage in spite of the proximity of the area to the urban edge of Cheltenham. The area's sense of place and history is particularly strong due to the presence of the moat and fishpond Scheduled Monument, and historic buildings in the vicinity and the presence of surviving ridge and furrow to the east. However the level of development envisaged on this site mean that it will be difficult to avoid any detrimental impact on the historic environment. A smaller scale of development could more easily accommodate retention of the historic features.</p> <p>Part of the residual development required under this scenario could possibly be contained within the broad locations put forward for development but dependent on the sensitivity of the area could have potentially negative impacts on this objective. For example, further development could be accommodated within locations C3 and T2 with little or no negative impacts on the historic environment.</p>	
<p>8. Sustainable Transport How well will this scenario reduce the need to travel and promote more sustainable transport choices and achieve a modal shift to public transport, cycling and walking.</p>	<p>Short term By concentrating development within existing urban areas and peripheral locations best use can be made of existing public transport infrastructure as well as encouraging sustainable modes of transport such as cycling and walking. The concentrations of development envisaged under this scenario at the broad locations make the provision of new public transport infrastructure easier to incorporate into the development at the planning stage.</p> <p>Encouragement for the use of sustainable modes of transport, such as public use bicycles and cycle lanes, has been secured through residential development. The opportunities for this type of infrastructure investment are moderate in line with the moderate level of development envisaged by this scenario.</p> <p>Long term The majority of the development envisaged at each of the Broad Locations will take place in the latter half of the plan period. Each of the locations is dealt with in turn:</p> <p>Broad Locations G1 and G3 Both these locations are adjacent to main transport routes and are considered accessible locations. As such, this scenario maximises the opportunities to both capitalise on existing public transport and increase the opportunities for a choice of means of access to goods and services for the people living in new homes in this area.</p>	<p>GREEN</p>
		<p>RED</p>

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	<p>Broad Location G9 This area is well located close to the A40. In addition, the Old Cheltenham Road bisects the site from east to west. High frequency bus services between Gloucester and Cheltenham currently traverse the location. Development of this area could (provide a safe green infrastructure network linked into current pedestrian and cycle ways. This location is ideally situated to encourage a modal shift away from the use of the private car.</p> <p>Broad Location C3 This area is well connected to Cheltenham by public transport. High frequency bus routes run along Tewkesbury Road and opportunities exist to support travel by non-car modes for the southern and central parts of the this broad location due to its proximity to the north-west periphery of Cheltenham. There is also the potential to include a park and ride facility here, this reducing congestion and associated air pollution in the town centre but may not reduce the number of car based journeys.</p> <p>Broad Location C6 Significant opportunities exist at this location to support travel by non-car modes given the close proximity to the South western periphery of Cheltenham and existing public transport. A network of footpaths provides good connections to the urban edge.</p> <p>Broad Location T2 This location is a considerable distance from Tewkesbury town centre; however it is well connected to highway infrastructure. There are frequent public transport services through adjacent Northway into both Tewkesbury and Cheltenham town centres with good potential to extend the public transport network into this broad location and to provide some pedestrian and cycling links. However, the high level of employment land already existing and envisaged at this location combined with the relatively low number of residential units may increase in-commuting from the surrounding area. This will have an extremely negative impact on this objective as the majority of these journeys are likely to be by private car. However, it should also be noted that the brownfield site currently used as employment space by the MOD forms a significant part of this broad location. Approximately 630 people are employed on the MOD site; therefore there may be no net increase in the number of in commuting journeys.</p> <p>A protected potential freight railhead exists within this broad location, which should be explored as part of any development at this location. Development at broad location T2 offers opportunities to enhance the station at Ashchurch and frequency of train services serving the area. This could improve the attraction of rail for commuting to the other main centres for both new and existing residents and could make rail freight a viable alternative for both the</p>	

SA Objective/Indicator	Commentary	Performance
	<p>existing and proposed businesses within and surrounding this location.</p> <p>All the broad locations envisaged for development under this scenario offer significant opportunities to implement more sustainable transport choices. The medium level of development means that congestion may become an issue.</p> <p>There is potential for either a positive or negative impact on this objective as a result of the residual development envisaged under this scenario. If the development is dispersed across the rural area there is likely to be a negative impact as the provision of public transport in these areas is often problematic without significant public subsidy. If the residual development is concentrated in locations adjacent to existing public transport infrastructure, closer to urban centres, then the provision of public transport and access to services by walking and cycling is less of an issue and may result in a positive impact on this objective.</p>	
<p>9. Waste and Pollution How will this scenario help minimise waste created during construction and in use, and reduce light, air, noise pollution?</p>	<p>Short term There will be opportunities to reuse and recycle materials on brownfield sites, particularly where existing structures are demolished. The contribution that new urban development makes to light pollution is likely to be negligible. The amount of light pollution in rural areas is likely to be greater due to the darker skies experienced there; the distribution pattern of development to existing settlements will be the biggest determinant of this impact and cannot be assessed at this stage.</p> <p>Long term Waste, light, air and noise pollution when the development is in use will be dependent on the masterplanning of individual sites and whether or not new development is built to the highest environmental standards. It is expected that the JCS will contain policies with regard to sustainable construction and masterplanning. The feasibility of using waste for energy when planning for large scale developments could also be investigated.</p> <p>The greater the number of households in the area, the greater the likelihood of increased waste arising overall. Providing space to store recyclable materials within developments and provision of recycling centres can help encourage more sustainable habits among the population and may reduce waste arising per capita. The provision of recycling facilities this needs to be integrated into careful masterplanning.</p> <p>Broad Location T2 may contain contaminated land; its redevelopment could therefore have a potential positive impact on this objective.</p>	<p>GREEN</p>
		<p>GREEN/ AMBER</p>

SA Objective/Indicator	Commentary	Performance
<p>10. The economy How well will this scenario help to ensure the availability of employment land, encourage inward investment and support existing businesses?</p>	<p>Short term In the early stages of the plan the focus for development under this scenario is within the urban areas where employment land is limited to existing permissions and allocations. Current forecasts suggest circa 40ha of additional B Class employment land is required across the JCS area to accommodate anticipated employment growth of approximately 4% in B Class jobs over the plan period. However, this land requirement is allied to an element of “spaceless” growth wherein approximately 10% growth of all B1(a/b) and B8 sector jobs takes place without the need for additional floorspace due to space management efficiencies. This accounts for approximately 1% of the total growth anticipated over the plan period.</p> <p>In the short term “spaceless” growth may allow growth in B1(a/b) and B8 sector jobs as will the take up of existing permissions and allocations. B2/B1(c) sector jobs are set to decrease by an average of 19% across the JCS area which will also free up a certain amount of floorspace.</p> <p>In common with Scenarios B and C there may be a certain lag in the development of employment sites within the broad location areas under this scenario. This may mean that employment led development opportunities come forward in the short term within the urban areas but further inward investment and expansion of existing businesses is delayed as land availability is limited.</p> <p>Long term Current forecasts suggest circa 40ha of B Class employment land is required across the JCS area to accommodate anticipated employment growth of approximately 4% in B Class jobs over the plan period. This land requirement is provided by this scenario in common with scenarios B and D.</p> <p>While 1% of the anticipated 15% growth in jobs is expected to be achieved without a net increase in floorspace, 14% is land dependent. The anticipated further diversification of the economy into non B Class uses accounts for over 11% of the anticipated growth, however the land requirements for this have not been taken into account by this scenario. This non B class growth in areas such as construction, hotels and catering and retail will have some associated land requirements which will need to be provided for. Should the unspecified residential residual be located within the broad locations, there is still potential for the land requirements of the non b class growth to be accommodated within these areas due to the modest scale of development envisaged by this scenario.</p> <p>The higher levels of residential development proposed under this scenario are likely to see the JCS start to become an area with reasonable levels of housing affordability; by the end of</p>	<p>RED/ AMBER</p> <p>AMBER/ RED</p>

SA Objective/Indicator	Commentary	Performance
<p>11. City and Town Centres How well will this scenario ensure the continued vitality and viability of the city and town centres and retail, service, leisure and learning destinations?</p>	<p>the plan period approximately half of all people are expected to be able to meet the cost of purchasing a home. This is likely to support the economic health and prosperity of the area as the JCS area is likely to a more attractive place for relocation and start up of new businesses.</p> <p>Short term In the early part of the plan period this scenario is likely to have a positive impact on ensuring the continued vitality and viability of city and town centres as the majority of new development will be concentrated in the main centres.</p> <p>Long term In common with Scenarios B and C this scenario is expected to see a modest level of population growth across the JCS area. However, this masks an expected decrease in population in the 25-59 age group in both Cheltenham and Tewkesbury Boroughs. It appears that under this scenario Cheltenham Borough struggles to attract working age people who would support the vitality and viability of the centre and local leisure facilities.</p>	GREEN
<p>12. Sustainable Communities How will this scenario contribute towards the need to reduce inequalities in wellbeing and offer opportunities for all?</p>	<p>Short term The main influences exerted by the JCS on this objective are linked to access to affordable housing, health and education. The urban intensification under this scenario is likely to secure access to health and education services by a choice of means of transport but the modest level of development envisaged means that contributions towards improvements to services may be limited.</p> <p>During the initial half of the plan period the net newly arising affordable housing need is expected to fall significantly in all three districts. This means that, in the short term, more people will be able to access affordable housing that meets their needs. The higher level of development envisaged outside the urban area means that the levels of people making use of services should secure existing services and enhance services where necessary.</p> <p>In order to bring forward a sustainable community within broad location T2, it is likely to be necessary to provide substantial investment in community infrastructure including a community centre and primary healthcare due to the distance and accessibility of this area to Tewkesbury town centre. It is debatable whether the modest level of homes would be sufficient to secure this level of community infrastructure when site remediation costs are taken into consideration. There may be scope for some of the residual development required by this scenario to be accommodated within area T2 enabling a more sustainable community to be developed at this location.</p>	AMBER

SA Objective/Indicator	Commentary	Performance
	<p>Long term</p> <p>This scenario sees both the backlog of need for affordable housing and the net newly arising need for affordable housing fall during the middle of the plan period before rising again. A lack of affordable housing may lead to an increase in the number of households unsuitably housed with higher incidences of overcrowding, concealed households and hidden homelessness; all of which have negative mental health impacts.</p> <p>Residential development within broad locations G1 & G4 would require enhanced primary health care to the north and east of Gloucester which may result in better provision for those already living in the Innsworth/Longlevens & Brockworth areas.</p> <p>The level of development at envisaged at broad location C3 will require enhanced primary health care infrastructure to the west of Cheltenham which is likely to result in better provision for existing communities at Swindon Village and Uckington. The lower level of development envisaged within location C6 should be absorbed into the existing health care infrastructure to the south of Cheltenham.</p> <p>The aspiration to secure improved primary health care facilities within Tewkesbury town centre is supported by this scenario as the level of development envisaged will contribute to funding of the facilities. However, the distance of the proposed facilities from broad location T2 may mean that health funding for GP or dental services is a higher priority.</p> <p>The high level of residual development under this scenario will require careful planning in terms of healthcare access. There may be scope for more development to be accommodated within some of the broad locations currently proposed for development – particularly within C3 where new healthcare facilities would already be required.</p>	AMBER
<p>15. Housing</p> <p>How well will this scenario perform against the objective to ensure that everyone has access to a decent home that they can afford and meets their need?</p>	<p>Short term</p> <p>During the initial half of the plan period the net newly arising affordable housing need is expected to fall significantly in all three districts. This means that, in the short term, more people will be able to access affordable housing that meets their needs. In addition the level of development anticipated means that the backlog need for affordable housing is also addressed under this scenario and begins to decrease.</p> <p>Long term</p> <p>The number of people able to afford to buy increases under this scenario with approximately half of all people being able to afford a home by 2031. This is likely to have a positive impact on affordability and access to housing. The percentage of affordable housing required will increase in both Gloucester and Cheltenham Borough but there is likely to be a fall of 22% across Tewkesbury Borough. The proportion of people expected to be able to meet market</p>	GREEN
		AMBER

SA Objective/Indicator	Commentary	Performance
	<p>level rents remains approximately stable over the plan period under this scenario.</p> <p>Under this scenario the household to dwelling ratios show that the number of households will exceed the available housing within Gloucester and Cheltenham Borough but will fall in Tewkesbury Borough by the end of the plan period. However, are likely to improve as compared with Scenario C. As household numbers exceed available dwellings then concealed households are necessarily created. This shortfall of available housing is likely to exert upward pressure on house prices and market rents – with demand exceeding supply.</p> <p>The level of development planned for the broad locations areas mean that with careful masterplanning there should be opportunities to plan for the increasingly aged population in terms of sheltered or extra care housing, however, should the majority of the residential residual be accommodated within the broad locations currently envisaged for development this type of extra care facility will be much more difficult to accommodate.</p>	
<p>16. Green/Open Space Will this scenario protect and improve access to public green and open space and/or offer opportunities to create and enhance new open space, along with providing a network of green and open space?</p>	<p>Short term There are good opportunities to introduce green infrastructure and enhance open and green spaces both within the urban areas. However, in common with all the scenarios, there is a risk that the level of development envisaged within the existing urban area may reduce the level of green and open space within the urban fabric.</p> <p>Long term In the latter part of the plan period the majority of development is concentrated in the broad locations. Each of the locations is dealt with in turn.</p> <p>Broad Location G1 Development of this area could have an extremely positive impact on this objective. Part of location G1 is in floodplain and the provision of strategic SuDS can also be used to create strategic green infrastructure and help create a network of greenspace. This will need to be carefully masterplanned into the design of the overall development at a very early stage.</p> <p>Broad Location G9 This area contains important undeveloped greenspace. There will be opportunities through good design to increase access to this greenspace. Through careful masterplanning a green infrastructure network and the provision of some public green space along the northern border of this area could maintain a degree of separation between Innsworth, Churchdown and Gloucester.</p> <p>Broad Location C3 There are currently allotments within area C3, these will need to be protected, and in addition</p>	<p>AMBER/ GREEN</p> <p>GREEN/ AMBER</p>

SA Objective/Indicator	Commentary	Performance
	<p>opportunities should be sought to include community gardens/allotments in new development in an attempt to mitigate against the loss of any high grade agricultural land. However, the level of development envisaged in this area should not encroach on the high grade agricultural land present.</p> <p>Broad Location C6 There is currently a significant amount of green and open space close to this area. There are large sports fields at Leckhampton, as well as allotments and public pathways linking the area into Cheltenham. Development of this area will offer significant opportunities to enhance access to open space provided this is carefully masterplanned at the early stages.</p> <p>Broad Location T2 A significant part of this area consists of hardstanding. There are opportunities here to create green and open spaces as part of any development and also to create links to the adjacent open countryside.</p> <p>This scenario maximises the opportunities to enhance green infrastructure in line with the higher levels of contribution that can be generated from the higher levels of development.</p> <p>The as yet undesignated residual development associated with this scenario carries a low to moderate risk of a negative impact on this objective. The main risk arises if the majority of the residual development were to be shared among the broad locations already proposed for development; it would then be a much harder task to incorporate green space into the designs at the masterplanning stage.</p>	
<p>17. Education and Skills How well will this scenario help ensure access to education for all (including lifelong learning and skills enhancement)?</p>	<p>Short term Existing schools will be able to accommodate children from the residential development expected in the urban areas under this scenario. Moreover, residents of the development within the urban areas will be able to access existing public transport routes to gain access to existing FE colleges at campuses in both Gloucester and Cheltenham.</p> <p>Opportunities for adult education are accessible at both Gloucester and Cheltenham with public transport options along arterial highways between the main centres and from Tewkesbury and Bishops Cleeve. Adult education opportunities are limited within the Tewkesbury/Ashchurch urban area and urban intensification will do little to address this.</p> <p>Existing schools would absorb increased pupil numbers until new facilities provided for primary aged children at broad locations G1, C3 and T2.</p>	<p>AMBER/ RED</p>

SA Objective/Indicator	Commentary	Performance
	<p>Long term Cheltenham and Gloucester currently offer very good education and training opportunities catering for all ages and levels of educational attainment. The situation in Tewkesbury is less positive in terms of adult education provision.</p> <p>With the exception of T2, the peripherality of the proposed broad location sites to the main urban areas centres along with good public transport opportunities means that future residents of the broad locations could easily access a good range of education and skills training facilities. In particular G4 offers excellent access to education and skills development. There are a number of nursery and primary schools close to the area which is also in close proximity to Brockworth Enterprise and Community Comprehensive School and Business College.</p> <p>Location T2 is within fairly close proximity to Ashchurch Primary School (20 minute walk). There is a large secondary school at Tewkesbury cannot be considered to be within a 20 minute walking distance. There is a shortage of adult skills and education facilities in Tewkesbury, although Cheltenham's facilities are easily accessible by public transport.</p> <p>There is a risk under that the level of development at each of the broad locations is insufficient to trigger developer contributions to the level of education provision necessary to ease the strain on existing facilities. Under this scenario there is scope for some of the residual development to be incorporated into the broad locations proposed which may secure contributions for enhanced facilities.</p>	AMBER/ RED
<p>18. Culture and Tourism How will this scenario perform against the objective to protect and enhance our cultural heritage and promote sustainable tourism?</p>	<p>Short term This scenario maximises the opportunities to enhance the cultural heritage of Cheltenham and Tewkesbury Boroughs in line with the higher levels of contribution that can be generated from the higher levels of development.</p> <p>Opportunities for Gloucester to continue to secure vitality and vibrancy of the City Centre as part of the heritage led urban regeneration are likely to continue under this scenario.</p> <p>Long term In common with all the scenarios there is a risk of changes to the character of the existing built form of Cheltenham Town owing to increased demand to build on existing vacant spaces, this in turn may impact on the tourism industry as the character and form of the town changes.</p> <p>The landscape of the JCS is one of the major attractants for tourists to the area. There is a risk that the location of the residual development envisaged under this scenario has a</p>	AMBER
		AMBER

SA Objective/Indicator	Commentary	Performance
	<p>negative impact on the landscape with associated impacts on the attractiveness of the area. In addition the rural residential development has not been attributed to individual villages and there is a risk that unsympathetic development could harm the character and/or setting of particularly sensitive villages.</p> <p>Under this scenario a 71% increase in the over 60s population is anticipated, this may result in urban centres being perceived as retirement locations rather than places for young adults to visit or relocate to.</p>	

JCS Broad Locations Sustainability Appraisal

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Site Reference No. G1 Land North of Gloucester Total Area of Site 283.35 ha

SA Objective/Indicator	Notes and Commentary	Performance
Biodiversity		
1a Does the broad location contain sites of biodiversity value e.g. SSSI?	Yes Innsworth Meadow SSSI considered to be in unfavourable/recovering position is situated in the centre of this broad location. SSSI will continue to decline long term due to isolation from like habitat Odd isolated veteran tree Whole area is part of Severn Vale Wet Grassland Strategic Nature Area	RED
1b Is the broad location within 5km of a European Designated Site (SAC or SPA)	No	GREEN
1c Are there designated BAP Priority Habitats on the site?	Yes A small area of Lowland Meadow BAP is situated to the centre of the site. Coastal and floodplain grazing marsh BAP is situated along the western site boundary.	RED
1d Would development of the site be likely to lead to fragmentation of important habitats	No There are opportunities for development to significantly improve connections between habitats	GREEN
1e Will development of the site offer opportunities to link important habitats/create wildlife corridors?	Yes Significant benefits could result from development. Opportunity to bring brooks and immediate fields into sympathetic management. Opportunity to enable SSSI to re-connect to wider habitat. Significant opportunity to integrate into strategic GI and potential Severn Vale Regional Park.	GREEN
Overall likely biodiversity impact?	There is a real opportunity to bring the fields alongside Hatherley Brook and the SSSI into sympathetic management if the site is developed.	GREEN
2. Climate Change Mitigation		
For the purposes of broad location SA this objective considers renewable energy potential only. Reduction of carbon emissions through location and transport are dealt with under SA Objective 8. Design of development to reduce carbon will form part of later detailed masterplanning stage of selected broad locations.		
2a Does the site have any renewable energy resource potential?	Yes/No Further information required.	
2b Is there large energy/heat demand potential from	Yes/No Further information required.	

<p>facilities/premises in the area that could benefit from excess heat from decentralized energy e.g. hospital/leisure centre/large manufacturer?</p>			
<p>3. Climate change Adaptation</p>	<p>This objective is not assessed as part of the broad locations SA. Flooding is considered separately and other climate change adaptation techniques will be a fundamental part of the design of individual developments rather than site specific.</p>		
<p>4. Flooding Does the broad location contain areas in Flood Zones 2, 3a or 3b? If so give approximate percentage of the site affected.</p>	<p>Flood zone 2</p>	<p>Flood zone 3a</p>	<p>Flood zone 3b</p> <p>A significant proportion of this site lies within the floodplain. The flood plain cuts the G1 site in half. Land to the south of the floodplain near Innsworth may be more suitable for development than land to the north as the flood constraint naturally separates the site.</p>
<p>5 & 6 Natural Resources</p>			
<p>5a Is the site brownfield or Greenfield (if Greenfield state approximate percentage of total area)?</p>	<p>Greenfield %</p>	<p>Predominantly Greenfield – 95%</p>	
<p>5b Does the site contain any existing buildings which could be refurbished?</p>	<p>Yes/No</p>	<p>Further information required.</p>	
<p>5c Does the site contain landscape designations e.g. AONB, local designation.</p>	<p>Yes/No</p>	<p>No landscape designations</p>	
<p>5d Overall judgement of landscape sensitivity</p>	<p>Site G1 – overall rating of sensitivity; low The area is predominantly a flat, agricultural landscape with very little visual, ecological and cultural qualities. Large mature native trees such as Oak and Ash set within hedgerows and historic field boundaries are however prominent within the flat landscape. Distant views to the Cotswold escarpment to the east and various other hills such as Mayhill and Churchdown Hill are visual receptors. The determination of the sensitivity of the site is initially valued as of low quality and the landscape character can be replaced or substituted.</p>		

6a Does the site contain high grade agricultural land – Grades 1,2 and 3a (if give the approximate percentage)	Yes Grade 1 25%	Yes Grade 2 25%	Yes Grade 3 25%	The site comprises a mix of Grades 1 2, 3 and 4. The northernmost area of the site is Grade 2 and the southernmost Grade 1, surrounded by grade 3.	AMBER
6b Would development of the site help clean up contaminated land or eradicate invasive alien plants e.g. Japanese Knotweed?	Yes/No				
6c Are there known mineral deposits? Are these viable and will they need to be extracted before development?	Yes/No	Further information required.			
6d Are there any water supply constraints?	Yes	SIDP: major reinforcements required			RED
6e Are there any Sewerage Network/Capacity constraints	Yes	SIDP: waste water requirements appear to be low			RED
7 Historic Environment					
7a Does the site contain areas of archaeological significance or historic value.	Yes	Grade II listed building – Twigworth Lawn, Twigworth Grade II listed building – Yew Tree Cottage, Twigworth			
7b Is the broad location within (or partly within) a Conservation Area	Yes/No	No			
8. Transport					
8a Is the broad location in, or close to, an area of high accessibility to key facilities	Yes/No	Located to the north of Gloucester, with very good accessibility to key services, including the city centre which can be accessed via existing sustainable modes of transport. Well related to the wider Gloucester urban area.			GREEN
8b Is the site well	Yes/No	Site located with good access to the A40 and A38. Well related to			GREEN

<p>connected to the transport infrastructure network, and will the location provide opportunities to support travel by non car modes.</p>		<p>Gloucester and located in close proximity to Gloucester City Centre which can be accessed by a range of sustainable transport modes. Existing bus services run through the site though at present only on an hourly basis.</p>	
<p>8c Are there any Highway Junction capacity constraints?</p>	<p>Yes</p>	<p><u>Problems:</u> Congestion on existing local road network with limited potential to enhance junction capacity.</p> <p>A40 Gloucester NBP provides a significant barrier to walking and cycling journeys into local community services in Gloucester.</p> <p><u>Possible solutions/opportunities:</u> Improvement of existing junctions along A40 Gloucester Northern Bypass.</p> <p>Strengthening bus corridor (94 / 97 / 98) between Cheltenham and Gloucester, although these would require enhancement to provide additional passenger capacity.</p> <p>NW Cheltenham Relief Road linking A40 with A4019 would provide local traffic relief to Innsworth / Longlevens.</p> <p>If developed in conjunction with C5 and G2 would provide stronger opportunities for investment in major improvements to local highway and bus networks – links between A40 at Innsworth to A4019 would benefit local roads. Harder to achieve if developed in isolation</p>	
<p>9. Waste and Pollution</p>			
<p>9a Is the site close to or within a reduced air quality area?</p>	<p>Yes/No</p>	<p>Part of site within Longford Water Reclamation Works Odour Zone The area to the middle of the site is allocated under Tewkesbury Local Plan Policy EVT8 'development near sewage treatment works', which seeks to ensure that development is not permitted which would be adversely affected by odour pollution.</p>	<p>AMBER</p>
<p>9b Is the site close to an existing or planned waste processing facility?</p>	<p>Yes/No</p>	<p>No</p>	<p>GREEN</p>
<p>10. Economy</p>			
<p>10a Is the broad location</p>	<p>Yes/No</p>	<p>Existing highway infrastructure for HGVs not particularly good. A38 bounds site to the west.</p>	<p>RED</p>

suitable for a mix of employment opportunities? 10b Is the broad location close to a range of existing employment opportunities?		Site more suitable for a mix of B1 uses accessed from A38 rather than B2 or B8.	
	Yes/No	Adjacent to Innsworth Trading Estate & close to Imjin Barracks. Site lies in close proximity to Gloucester City Centre with its range of employment opportunities. Site is particularly close to St. Oswalds Retail Park in Gloucester. Site also in close proximity to Staverton employment sites.	GREEN
11 City and Town Centres Does the site have the ability to create and sustain a vibrant community? Will it support the existing town and city centre facilities or will it help unlock identified needed facilities?	Support Existing Yes/No	Unlock new Yes/No Further information required.	
12. and 13. Sustainable Communities	These objectives will be considered at a later stage in the SA/SEA process during the more detailed design and masterplanning stages.		
14. Health 14 Could development of the site improve access to local health facilities and improve health inequalities?	Yes	Contributions from development could help to improve primary health care in the vicinity. Closest GP surgeries in Churchdown and at Kingsholm not necessarily accessible by foot. A&E at Gloucester Royal Hospital in Gloucester City Centre in relatively close proximity to the site.	GREEN/AMBER
15. Housing	All the sites are likely to be able to deliver some identified housing need. The tenure split, ratio of affordable to open market, size and density of housing would form part of a more detailed assessment at a later stage in the SA/SEA process.		
16. Green Space 16a Does the location provide the opportunity for access to the countryside and natural environment?	Yes	Opportunities to link into potential Severn Vale Regional Park.	GREEN

16b Does the site contain strategic open green space?	Yes/No	Further information required.	
16c Will it ensure existing open spaces are protected and enhanced?	Yes/No	There are excellent Green Infrastructure opportunities	GREEN
17. Education			
17 a Will the site allow good access to educational facilities or the ability to support existing facility or a new facility?	Yes/No	<p>Site would require delivery of a new primary school but part of site is in 20 minute walking distance to Innsworth Primary School. Southern part of site in 20 minute walking distance of Gloucester Academy/Bishops College site on Estcourt Road</p> <p>Good access from site to further education facilities at Gloucestershire College at The Docks in Gloucester.</p> <p>County Info: If developed along with G2 and / or G9 (currently not part of the infrastructure assessment process) further consideration will need to be given to the cumulative impact upon the existing early year's / primary network. Particularly, when reviewing on-site or off-site options and / or when taking into account 'existing capacity' with the modelling (size and scale) of any new on-site provision.</p> <p>Similarly if developed along with G2 and / or G9 and / or G3 further consideration will need to be given to the cumulative impact upon the existing secondary network. This is particularly important as off-site provision is the most likely solution in this instance.</p> <p>Early advice on the requirements of other infrastructure services would be welcomed so as to give as much opportunity as possible to explore a more integrated / shared services solution (the development of the community hub model).</p>	GREEN/AMBER
18. Culture and Tourism			
		The impact on this SA objective will form part of a more detailed SA/SEA assessment later in the JCS process.	
19. Deliverability of Site and other strategic spatial options?			
19a Are there any known needs for essential infrastructure?		The requirements for infrastructure are currently subject to initial appraisal by infrastructure providers.	

<p>19b Will development of the site ensure greater self containment of the urban areas?</p>	<p>Yes/No</p>		
<p>19c Is the site within the Green Belt (summarise findings of greenbelt review).</p>	<p>Yes</p>	<p>All of the site area, apart from the western end of the site, which is already allocated for development, lies within the current greenbelt designation. The draft greenbelt review considered most of the G1 area to have a limited strategic contribution, playing little role in the separation of settlements.</p>	
<p>Conclusion:</p>			
<p>G1 Land North of Gloucester scores highly against all the sustainability criteria apart from Flood Risk and Use of Resources, almost 50% of the area is Grade 1 agricultural land. Reducing the area of search to land south of the flood plain is likely to greatly increase the sustainability rating of this broad location. Development of this site offers significant opportunities to improve natural habitats and enhance biodiversity and for this reason scores particularly highly against this objective. The initial determination of the landscape sensitivity of this site is of low quality and it is expected that the landscape character could be replaced or substituted. The area is well related to the Gloucester urban area and key facilities and services would be readily accessible</p> <p>Some of site G1 may be a suitable site for development. Land to the Western Boundary is already allocated for development. Land to the south of the floodplain near Innsworth, does from the findings of this desktop initial sustainability appraisal, appear to be in a relatively sustainable location. It is recommended that this smaller location area be taken forward for further consideration and appraisal.</p>			
<p>County Libraries info: Encourage early and open dialogue between potential infrastructure / service providers, particularly where alternative, integrated / shared services solution may be possible. From the library service perspective examples include:- better alignment with public transport to improve accessibility and the expansion of co-location opportunities (e.g. with youth services, children's centres, Police, GP and health care, district and / or town council services, and volunteer / 3rd sector activities etc...)</p>			
<p>If strategic-scale development growth is taken forward in this locality (several thousand units across G1 and / or G2 and / or G3) careful consideration will need to be given to a review of the form and status of the proposed local tiered libraries. This may also result in new (on-site) facilities and / or significant re-modelling of the existing provision.</p>			

JCS Sustainability Appraisal – Broad Locations

Site Reference No. G2 Land to the North/North East of Gloucester

Total Area of Site 651 hectares

SA Objective/Indicator	Notes and Commentary	Performance
Biodiversity		
1a Does the broad location contain sites of biodiversity value e.g. SSSI?	No	The closest SSSI is Ashelworth Hams/Mainlode Cliff which lies more than 5km from the area of search. NCN3 Key Wildlife Site at Prior's Grove
1b Is the broad location within 5km of a European Designated Site (SAC or SPA)	No	
1c Are there designated BAP Priority Habitats on the site?	Yes	On the northern part of the area only there are BAP habitats; two areas of wet woodland and a significant area of coastal floodplain and grazing marsh.
1d Would development of the site be likely to lead to fragmentation of important habitats	Yes/No	Connectivity to broader habitat type is hampered by airport infrastructure, the A40 and the railway line. It is better to the north of the site.
1e Will development of the site offer opportunities to link important habitats/create wildlife corridors?	Yes/No	With exception of the land south of the A40, this is generally a damaged habitat with only the water courses giving it potential. The site is mainly biodiversity poor, development could therefore opportunities to link habitats.
Overall likely biodiversity impact?	A large site with varying habitat. Much is gang mown grassland or either the airport or the golf course although the latter does have some interesting (if extensively managed) features.	AMBER
2. Climate Change Mitigation		
For the purposes of broad location SA this objective considers renewable energy potential only. Reduction of carbon emissions through location and transport are dealt with under SA Objective 8. Design of development to reduce carbon will form part of later detailed masterplanning stage of selected broad locations.		
2a Does the site have any renewable energy resource potential?	Yes/No	
2b Is there large energy/heat demand	Yes/No	

<p>potential from facilities/premises in the area that could benefit from excess heat from decentralized energy e.g. hospital/leisure centre/large manufacturer?</p>			
<p>3. Climate change Adaptation</p>	<p>This objective is not assessed as part of the broad locations SA. Flooding is considered separately and other climate change adaptation techniques will be a fundamental part of the design of individual developments rather than site specific.</p>		
<p>4. Flooding Does the broad location contain areas in Flood Zones 2, 3a or 3b? If so give approximate percentage of the site affected.</p>	<p>Flood zone 2</p>	<p>Flood zone 3a</p> <p>Yes Less than 5%</p>	<p>Flood zone 3b</p> <p>Yes</p>
		<p>The River Severn floodplain cuts the area in half and forms a natural geographical barrier. A wide corridor of land within Flood zone 3b crosses into this broad location from the west, this narrows and splits prior to reaching Gloucestershire Airport and travels in an easterly and south easterly direction. The flood zone is widest on the wedge of land adjoining G1. For this reason this section of the broad area is unlikely to be suitable for development and overall the area is relatively unconstrained</p>	
<p>5 & 6 Natural Resources</p>			
<p>5a Is the site brownfield or Greenfield (if Greenfield state approximate percentage of total area)?</p>	<p>Greenfield 50 %</p>	<p>Mixture of Greenfield and brownfield. Within the site current land use includes a golf course, open space, the airport, industrial, and limited residential.</p>	
<p>5b Does the site contain any existing buildings which could be refurbished?</p>	<p>Yes/No</p>	<p>This will be assessed at a later stage in the SA/SEA site selection process.</p>	
<p>5c Does the site contain landscape designations e.g. AONB, local designation.</p>	<p>Yes</p>	<p>The site lies outside the AONB & has no local landscape designations</p>	
<p>5d Overall judgement of landscape sensitivity</p>		<p>The landscape sensitivity varies across G2 from low to medium in the north west with the highest sensitivity to the south of the location. The area has a diverse existing land use and form which varies between industrial sites, linear villages and agricultural fields. The agricultural patchwork of fields is large to medium in scale and is predominantly regular in shape which is typical to the Gloucester Vale character. There is value of in retaining part</p>	

			of this site as a green corridor to prevent visual coalescence of Cheltenham and Gloucester.			
5e Does the site contain high grade agricultural land – Grades 1,2 and 3a (if give the approximate percentage)	No Grade 1 %	No Grade 2 %	Yes Grade 3 50%	Predominantly non-agricultural, Some grade 3 to the North		GREEN
5f Would development of the site help clean up contaminated land or eradicate invasive alien plants e.g. Japanese Knotweed?	Yes/No	There are some contamination concerns relating to the existence of aerospace/industrial/manufacturing uses to the central area of the broad location. The development of this site could have a positive impact in terms of remediating potentially contaminated land.				
6a Are there known mineral deposits? Are these viable and will they need to be extracted before development?	Yes/No					
6b Are there any water supply constraints?	Yes/No					
6c Are there any Sewerage Network/Capacity constraints	Yes/No					
Historic Environment						
7a Does the site contain areas of archaeological significance or historic value.	Yes	Significant number of listed buildings within the North West corner of the site located north of the flood plain. Any future development should consider local distinctiveness and sensitivity of the surrounding historic area.				AMBER
7b Is the broad location within (or partly within) a Conservation Area	Yes/No	No				
8. Transport						
8a Is the broad location in, or close to, an area of high accessibility to key facilities	Yes/No	Western boundary abuts the Churchdown area with some key service offer. Accessibility issues to the east and south given the prominence of the M5 and A40 (Golden Valley). Remote from Gloucester City Centre and significant accessibility issues to Cheltenham Town Centre.				RED
8b Is the site well	Yes/No	Site remote from strategic transport infrastructure, accessed via the Old				RED

<p>connected to the transport infrastructure network, and will the location provide opportunities to support travel by non car modes.</p>		<p>Cheltenham Road. Site is currently serviced by high frequency bus services between Gloucester and Cheltenham. Located remote from Gloucester City Centre and Cheltenham Town Centre for access to a wider range of shops, services and facilities.</p> <p>Development of site could help provide cycle path along Cheltenham Road East between Gloucester & Cheltenham.</p>	
<p>8c Are there any Highway Junction capacity constraints?</p>	<p>Yes/No</p>	<p>Capacity problems at Arle Court & Benhall roundabouts at am & pm peak times.</p> <p>Loss of Airport as a transport facility; If Airport retained – potential constraint on the scale of neighbouring development that is feasible; Congestion on existing local road network with limited potential to enhance junction capacity; A40 Gloucester NBP provides a significant barrier to walking and cycling journeys into local community services in Gloucester; Limited access to rail stations in Cheltenham and Gloucester.</p> <p>If developed in conjunction with C5 and G1 would provide stronger opportunities for investment in major improvements to local highway and bus networks – links between A40 at Innsworth to A4019 would benefit local roads. Harder to achieve if developed in isolation.</p>	<p>RED</p>
<p>10. Waste and Pollution</p>			
<p>9a Is the site close to or within a reduced air quality area?</p>	<p>Yes/No</p>		
<p>9b Is the site close to an existing or planned waste processing facility?</p>	<p>Yes/No</p>	<p>The adopted Waste Local Plan to 2012 includes a preferred waste facility site within area G2</p>	
<p>10. Economy 10a Is the broad location suitable for a mix of employment opportunities?</p>	<p>Yes/No</p>	<p>The location is more suited to employment uses related to high knowledge/aerospace technologies/engineering due to proximity of airport and nearby industrial site.</p>	<p>AMBER</p>
<p>10b Is the broad location close to a range of existing employment opportunities?</p>	<p>Yes/No</p>	<p>The airport lies within this broad location area, as does an important mainly airport related, high knowledge/value engineering cluster, there could be opportunities to build on this. Two industrial areas are located within G2, at</p>	<p>GREEN</p>

		Staverton, these are designated as major employment sites in the Tewkesbury Local Plan.		
		Site also lies half way between Gloucester & Cheltenham on a good bus route (94) offering access to employment opportunities at both centres (LMF)		RED
12 City and Town Centres Does the site have the ability to create and sustain a vibrant community? Will it support the existing town and city centre facilities or will it help unlock identified needed facilities?	Support Existing Yes/No	Unlock new Yes/No		
12. and 13. Sustainable Communities	These objectives will be considered at a later stage in the SA/SEA process during the more detailed design and masterplanning stages.			
14. Health				
14 Could development of the site improve access to local health facilities and improve health inequalities?	Yes	Contributions from developing the site could help improve primary health care in the vicinity. Closest GP/dental surgeries in Churchdown, then Kingsholm/Longlevens none in walking distance . A&E in Gloucester Royal Hospital in Gloucester City Centre.		GREEN/AMBER
15. Housing	All the sites are likely to be able to deliver some identified housing need. The tenure split, ratio of affordable to open market, size and density of housing would form part of a more detailed assessment at a later stage in the SA/SEA process.			
16. Green Space				
16a Does the location provide the opportunity for access to the countryside and natural environment?	Yes/No	Good green infrastructure connections along Normans Brook to the west and potential regional park		AMBER
16b Does the site contain strategic open green	Yes	Further information required.		

space?		Small area of land adjacent to the church is designated as locally important local space in Down Hatherley.	
16c Will it ensure existing open spaces are protected and enhanced?	No	Further information required.	
17. Education			
17 a Will the site allow good access to educational facilities or the ability to support existing facility or a new facility?	Yes/No	<p><u>Secondary Schools</u> Chosen Hill and Churchdown Secondary Schools in Churchdown <i>Majority of site not within 20 minute walking distance of a secondary school</i></p> <p><u>Primary Schools</u> Churchdown Village Parton Manor School Innsworth School <i>Majority of site not within 20 minute walking distance of a primary school</i></p> <p>Access to further education facilities at Gloucestershire College with campuses at both Gloucester & Chelt accessible by bus route no. 94, not within walking distance.</p> <p>County Info: If developed along with G1 and / or G9 (currently not part of the infrastructure assessment process) further consideration will need to be given to the cumulative impact upon the existing early year's / primary network. Particularly, when reviewing on-site or off-site options and / or when taking into account 'existing capacity' with the modelling (size and scale) of any new on-site provision.</p> <p>Similarly if developed along with G1 and / or G9 and /or G3 further consideration will need to be given to the cumulative impact upon the existing secondary network. This is particularly important as off-site provision is the most likely solution in this instance.</p> <p>Early advice on the requirements of other infrastructure services would be welcomed so as to give as much opportunity as possible to explore a more integrated / shared services solution (the development of the community hub model).</p>	RED
18. Culture and Tourism	The impact on this SA objective will form part of a more detailed SA/SEA assessment later in the JCS		

process.	
19. Deliverability of Site and other strategic spatial options?	
19a Are there any known needs for essential infrastructure?	The requirements for infrastructure are currently subject to initial appraisal by infrastructure providers.
19b Will development of the site ensure greater self containment of the urban areas?	No The broad location is too large for this to be assessed at present. Those parts of the site nearest to the urban Gloucester area could be more suitable in terms of ensuring greater containment of the urban core. However overall the distance of this broad location site from the urban cores, sited as it is in the middle of the mainly undeveloped area between Gloucester and Cheltenham, means it is not likely to ensure greater self containment of the urban areas, indeed large parts of this broad location area are of high importance in preventing the urban areas merging. The site could be considered suitable for some additional industrial provision to support the current airport and associated high knowledge/engineering aerospace sector.
19c Is the site within the Green Belt (summarise findings of greenbelt review).	Yes mainly A large proportion of the area is within the Greenbelt with the exception of the settlement areas of Staverton and Churchdown and the significant commercial airport site. Broad location C2 consists of component segments NW2, NW3, NW7, NW8 and part of NW10 which were assessed in the recent greenbelt study undertaken on behalf of the JCS by Entec. This report concluded that all these areas made a significant contribution to the Greenbelt, in particular in terms of checking the unrestricted sprawl of large built up networks, preventing towns from merging into one another
<p>Conclusion: The flood plain, along with the A40 trunk road split this large area into four distinct areas. Land to the north of the Horsbere Brook contains BAP habitats and is not well connected to the urban area.</p> <p>G2 Land North/North East of Gloucester scores well in relation to flood risk and use of natural resources, and reasonably well in relation to biodiversity impact. This is a large site with varying habitat, much is mown grassland of either the airport or the golf course.</p> <p>The landscape sensitivity varies across G2 from low to medium in the north west with the highest sensitivity to the south. The area has a diverse existing land use and form which varies between industrial sites, linear villages and agricultural fields. There is value in retaining part of this site as a green corridor to prevent visual coalescence of Cheltenham and Gloucester. This broad location could be suitable for some aerospace/high technology engineering sector building on the cluster of employment sites currently at this location and which will support the airfield operation.</p>	
	RED
	RED

County Libraries info:

Encourage early and open dialogue between potential infrastructure / service providers, particularly where alternative, integrated / shared services solution may be possible. From the library service perspective examples include:- better alignment with public transport to improve accessibility and the expansion of co-location opportunities (e.g. with youth services, children's centres, Police, GP and health care, district and / or town council services, and volunteer / 3rd sector activities etc...)

If strategic-scale development growth is taken forward in this locality (several thousand units across G1 and / or G2 and / or G3) careful consideration will need to be given to a review of the form and status of the proposed local tiered libraries. This may also result in new (on-site) facilities and / or significant re-modelling of the existing provision.

JCS Sustainability Appraisal – Broad Locations

Site Reference No. G3 Land North East of Gloucester

Total Area of Site 466.85 hectares

SA Objective/Indicator	Notes and Commentary	Performance
Biodiversity		
1a Does the broad location contain sites of biodiversity value e.g. SSSI?	No	GREEN
1b Is the broad location within 5km of a European Designated Site (SAC or SPA)	Yes	AMBER
1c Are there designated BAP Priority Habitats on the site?	Yes	RED
1d Would development of the site be likely to lead to fragmentation of important habitats	Yes/No	AMBER
1e Will development of the site offer opportunities to link important habitats/create wildlife corridors?	Yes	GREEN
Overall likely biodiversity impact?	The site has a small field pattern with reasonable hedgerow structure. The land type is predominantly arable and improved grassland. There is old pasture and orchard around the farmstead and occasional isolated Perry trees. To the eastern edge of the site there is some interesting semi-natural woodland (not identified as KWS but may not have been surveyed). There is some semi-improved grassland to the western fringes with remnant ridge and furrow.	AMBER
2. Climate Change Mitigation	For the purposes of broad location SA this objective considers renewable energy potential only. Reduction of carbon emissions through location and transport are dealt with under SA Objective 8. Design of development to reduce carbon will form part of later detailed masterplanning stage of selected broad locations.	

<p>2a Does the site have any renewable energy resource potential?</p>	<p>Yes</p>	<p>G3 lies within a constrained area for wind resource (particularly with regard to airfield related activity) There are opportunities for hydropower adjacent to this broad location High potential in terms of energy crops. Further information required.</p>	<p>NOT ASSESSED AT THIS STAGE</p>						
<p>2b Is there large energy/heat demand potential from facilities/premises in the area that could benefit from excess heat from decentralized energy e.g. hospital/leisure centre/large manufacturer?</p>	<p>Yes/No</p>								
<p>3. Climate change Adaptation</p>	<p>This objective is not assessed as part of the broad locations SA. Flooding is considered separately and other climate change adaptation techniques will be a fundamental part of the design of individual developments rather than site specific.</p>								
<p>4. Flooding Does the broad location contain areas in Flood Zones 2, 3a or 3b? If so give approximate percentage of the site affected.</p>	<table border="1"> <tr> <td data-bbox="715 1346 850 1487"> <p>Flood zone 2</p> </td> <td data-bbox="715 1487 850 1693"> <p>Flood zone 3a</p> </td> <td data-bbox="715 1346 850 1487"> <p>Flood zone 3b</p> </td> </tr> <tr> <td></td> <td>Yes</td> <td>Yes</td> </tr> </table>	<p>Flood zone 2</p>	<p>Flood zone 3a</p>	<p>Flood zone 3b</p>		Yes	Yes	<p>A very small part at the most South Westerly edge of this broad location lies within flood zone 3. This constitutes less than a couple of percent of the total area. Flood risk is not considered to be a constraint in this broad location area. Environment Agency currently undertaking substantial flood attenuation works to form a holding lake with associated landscape works to south west of site. This part of the site is therefore important as a flood storage facility during high rainfall events preventing flooding further downstream in Longlevents.</p>	<p>GREEN/AMBER</p>
<p>Flood zone 2</p>	<p>Flood zone 3a</p>	<p>Flood zone 3b</p>							
	Yes	Yes							
<p>5 & 6 Natural Resources</p>									
<p>5a Is the site brownfield or Greenfield (if Greenfield state approximate percentage of total area)?</p>	<p>Greenfield 98 %</p>	<p>Predominantly Greenfield</p>		<p>RED</p>					
<p>5b Does the site contain any existing buildings which could be refurbished?</p>	<p>Yes/No</p>								
<p>5c Does the site contain landscape designations</p>	<p>Yes</p>	<p>Over half of this site, between the railway line and the M5 (Churchdown Hill) is designated as a SLA (Special Landscape Area in the Tewkesbury</p>		<p>RED</p>					

e.g. AONB, local designation.			Local Plan).		RED
5d Overall judgement of landscape sensitivity			Site G3 – overall rating of sensitivity; high Despite the site having settlement edges along most of the sides the most influential landscape form and feature is Churchdown Hill near the centre of the area. The hill is mostly wooded and its lower slopes and flatter ground is surrounded by a dense patchwork of small fields with historic hedgerows. This is an important part of the wider green corridor which has a local significance due to its high quality landscape and character. Important views from the major communication corridors bordering its edges are across this attractive countryside and therefore an important visual gap dividing the two large urban areas. The quality of the natural environment should not be adversely affected and therefore the scope of mitigating any development in this area of search will be limited.		
5e Does the site contain high grade agricultural land – Grades 1,2 and 3a (if give the approximate percentage)	No Grade 1 %	No Grade 2 %	Yes Grade 3 50%	Mix of Grade 3 and 4	GREEN AMBER?
5f Would development of the site help clean up contaminated land or eradicate invasive alien plants e.g. Japanese Knotweed?	Yes/No	There are some contamination concerns relating to the presence of an historic landfill to the southernmost part of the site. The development of this site could have a positive impact in terms of remediating potentially contaminated land.			
6a Are there known mineral deposits? Are these viable and will they need to be extracted before development?	Yes/No				
6b Are there any water supply constraints?	Yes/No	Further information required.			
6c Are there any Sewerage Network/Capacity constraints	Yes/No	Further information required.			
8 Historic					

<p>Environment</p> <p>7a Does the site contain areas of archaeological significance or historic value.</p> <p>7b Is the broad location within (or partly within) a Conservation Area</p>	<p>Yes/No</p> <p>Yes/No</p>	<p>St. Bartholomew Church (grade I) to the north of the site towards the south of Churchdown as well as listed monuments within the grounds of the church. Prominent building which should be protected from future development. Numerous listed farmhouses to the south of the site, all of which are grade II listed.</p> <p>No</p>	
<p>8. Transport</p>			
<p>8a Is the broad location in, or close to, an area of high accessibility to key facilities</p>	<p>Yes/No</p>	<p>Western boundary abuts the A417 with the Barnwood area beyond, though prominence of A417 acts as a significant access barrier. Churchdown located to the north, offering some key services.</p> <p>Gloucestershire County Council aim to develop a Transport Interchange, including a Park and Ride Site at Elmbridge in the medium to long-term (LTP) which falls within this broad location site.</p> <p>Also an aspiration in LTP3 for a road freight facility between Gloucester & Chelt which could be accommodated at the site – (currently foreign lorries stop in lay bye's on A40 Gloucester north by-pass).</p> <p>Area South of railway and North of M5 has limited access through local roads, so only small scale development can be considered on this part of the site;</p> <p>Access to A40 would require HA approval and improvement of A40 Elmbridge Court Roundabout.</p> <p>Potential for development should be restricted to the land between the railway line and the A40.</p>	<p>AMBER/GREEN</p>
<p>8b Is the site well connected to the transport infrastructure network, and will the location provide opportunities to support travel by non car modes.</p>	<p>Yes/No</p>	<p>Northern part of the site well accessed by road given location adjacent to A40/A417 including Golden Valley between Gloucester and Cheltenham. Railway line dissects the northern part of the site, which could provide opportunities for enhanced rail services to and from Gloucester. Northern boundary of site serviced by high frequency bus services. Southern and eastern part of site bound by A417 and M5 and significantly less accessible.</p>	<p>AMBER/GREEN</p>

		Opportunities to promote park and ride and public transport as well as make improvements to cycle routes between Gloucester and Cheltenham	
8c Are there any Highway Junction capacity constraints?	Yes	<p>Problems:</p> <p>Area South of railway and North of M5 has limited access through local roads, so only small scale development can be considered on this part of the site. Potential for development should be restricted to the land between the railway line and the A40.</p> <p>Access to A40 would require HA approval and improvement of A40 Elmbridge Court Roundabout.</p> <p>Proposals for Gloucestershire Parkway Station have been dropped.</p> <p><u>Possible solutions/opportunities:</u></p> <p>Opportunity to integrate with LTP3 Elmbridge Park and Ride proposal and associated junction improvements at A40 / B4063 Elmbridge Court Roundabout.</p> <p>Opportunity to strengthen bus corridor between Cheltenham and Gloucester (especially the 94 service).</p>	
11. Waste and Pollution			
9a Is the site close to or within a reduced air quality area?	No		GREEN
9b Is the site close to an existing or planned waste processing facility?	No		GREEN
10. Economy 10a Is the broad location suitable for a mix of employment opportunities?	Yes	North western part of site is ideally suited to accommodate a broad range of employment development as is well linked to highway network with good access to Junctions 11 & 11A of M5.	GREEN
10b Is the broad location	Yes	North western part of site in close proximity to Gloucester City Centre.	AMBER

close to a range of existing employment opportunities?			Southern part of site lies opposite Barnwood Employment Area in north of Gloucester but is separated from it by A40 northern by-pass.	
13 City and Town Centres Does the site have the ability to create and sustain a vibrant community? Will it support the existing town and city centre facilities or will it help unlock identified needed facilities?	Support Existing Yes/No	Unlocked new Yes/No	North western sector of site between A40 Golden Valley and railway could provide an excellent employment opportunity with good highway infrastructure linkages. Site is not so well linked for residential purposes to an existing residential community. The North Western part of this broad area is reasonably close to Gloucester main urban centre and therefore could have a positive impact on the objective to create and sustain a more vibrant main urban community	AMBER
12. and 13. Sustainable Communities	These objectives will be considered at a later stage in the SA/SEA process during the more detailed design and masterplanning stages.			
14. Health				
14 Could development of the site improve access to local health facilities and improve health inequalities?	Yes/No		Contributions from development of site could improve local primary health care facilities. Closest GP/dental surgeries at Longlevens/Churchdown/Barnwood/Hucclecote but none in walking distance and site is separated from these existing centres by main routeways. A&E facilities at Gloucester Royal Hospital in Gloucester City Centre. Site well located to access this facility.	AMBER
15. Housing	All the sites are likely to be able to deliver some identified housing need. The tenure split, ratio of affordable to open market, size and density of housing would form part of a more detailed assessment at a later stage in the SA/SEA process.			
16. Green Space				
16a Does the location provide the opportunity for access to the countryside and natural environment?	Yes		Possible good connections to GI of Horsbere Brook flood attenuation scheme and Churchdown Hill if barrier of railway can be overcome.	GREEN
16b Does the site contain	Yes		Churchdown Hill – used for informal recreational purposes and is Special	RED

<p>strategic open green space? 16c Will it ensure existing open spaces are protected and enhanced?</p>	<p>Yes/No</p>	<p>Landscape Area.</p>	
<p>17. Education</p>			
<p>17 a Will the site allow good access to educational facilities or the ability to support existing facility or a new facility?</p>	<p>Yes/No</p>	<p><u>Secondary Schools</u> Chosen Hill and Churchdown Secondary Schools in Churchdown Southern part of site might look to Brockworth Secondary School <i>Southern part of site not within 20 minute walking distance of a secondary school</i></p> <p><u>Primary Schools</u> Churchdown Village Hillview Hucclecote Parton Manor School Catholic Primary School – Churchdown Longlevens Infant and Primary Schools <i>Apart from urban fringes adjacent to Churchdown and opposite Longlevens majority of site not within 20 minute walking distance of a primary school</i></p> <p>Access to further education at Gloucestershire College campuses in Gloucester and Cheltenham.</p> <p>County Info: If developed along with G9 (currently not part of the infrastructure assessment process) further consideration will need to be given to the cumulative impact upon the existing early year's / primary network. Particularly, when reviewing on-site or off-site options and / or when taking into account 'existing capacity' with the modelling (size and scale) of any new on-site provision.</p> <p>Similarly if developed along with G1 and / or G9 and /or G2 further consideration will need to be given to the cumulative impact upon the existing secondary network. This is particularly important as off-site provision is the most likely solution in this instance.</p> <p>Early advice on the requirements of other infrastructure services would be</p>	<p>RED/AMBER</p>

		welcomed so as to give as much opportunity as possible to explore a more integrated / shared services solution (the development of the community hub model).	
18. Culture and Tourism	The impact on this SA objective will form part of a more detailed SA/SEA assessment later in the JCS process.		
19. Deliverability of Site and other strategic spatial options?			
19a Are there any known needs for essential infrastructure?		The requirements for infrastructure are currently subject to initial appraisal by infrastructure providers.	
19b Will development of the site ensure greater self containment of the urban areas?	Yes/No		
19c Is the site within the Green Belt (summarise findings of greenbelt review).	Yes	The whole of this area falls within the statutory Greenbelt. Entec Green Belt Review finds that whole of site makes a significant contribution to the Green Belt between Gloucester and Cheltenham.	RED
<p>Conclusion:</p> <p>G3 scored reasonably well against most sustainability objectives, apart from landscape sensitivity. The area, which has the influential landscape form of Churchdown Hill at its centre, is considered to be an important part of the wider green corridor creating a visual gap dividing the two large urban areas. The area is not well linked for residential purposes to an existing community although the north western sector of this site between the A40 Golden Valley and railway could provide an excellent employment opportunity with good highway infrastructure linkages. This broad location site is not considered suitable for large scale housing, but part of the site could be taken forward for consideration for some employment land use.</p> <p>County Libraries Info: Encourage early and open dialogue between potential infrastructure / service providers, particularly where alternative, integrated / shared services solution may be possible. From the library service perspective examples include:- better alignment with public transport to improve accessibility and the expansion of co-location opportunities (e.g. with youth services, children's centres, Police, GP and health care, district and / or town council services, and volunteer / 3rd sector activities etc...)</p> <p>If strategic-scale development growth is taken forward in this locality (several thousand units across G1 and / or G2 and / or G3. And, or alternatively G3 and G4 and / or C6) careful consideration will need to be given to a review of the form and status of the proposed local tiered libraries. This may also result in new (on-site) facilities and / or significant re-modelling of the existing provision.</p>			

JCS Sustainability Appraisal – Broad Locations

Site Reference No. G4 Land East of Gloucester Total Area of Site 81.06 ha

SA Objective/Indicator	Notes and Commentary	Performance
1. Biodiversity		
1a Does the broad location contain sites of biodiversity value e.g. SSSI?	No	GREEN
1b Is the broad location within 5km of a European Designated Site (SAC or SPA)	Yes	AMBER
1c Are there designated BAP Priority Habitats on the site?	No	AMBER
1d Would development of the site be likely to lead to fragmentation of important habitats	No	GREEN
1e Will development of the site offer opportunities to link important habitats/create wildlife corridors?	The presence of the M5 and A417 form significant barriers in this broad location however there may be opportunities along Horsbere Brook to connect wildlife habitats (see below). Ensuring biodiversity is incorporated into any detailed masterplanning stage will help with this objective.	UNCERTAIN
Overall likely biodiversity impact?	Predominantly arable. Large field pattern with poor hedgerow structure. Very intensively farmed with exception of small remnant orchard off Brockworth lane and a very good orchard off the A46. There is useful habitat along Horsbere Brook. If the 2 orchards were maintained and a linear riparian strip along the brook is maintained then significant biodiversity improvements could result if developed	GREEN
2. Climate Change Mitigation		
2a Does the site have any renewable energy resource potential?	For the purposes of broad location SA this objective considers renewable energy potential only. Reduction of carbon emissions through location and transport are dealt with under SA Objective 8. Design of development to reduce carbon will form part of later detailed masterplanning stage of selected broad locations. Limited	Reduction of carbon emissions through location and transport are dealt with under SA Objective 8. Design of development to reduce carbon will form part of later detailed masterplanning stage of selected broad locations.
	No Wind Resource High Energy Crop Potential	

<p>2b Is there large energy/heat demand potential from facilities/premises in the area that could benefit from excess heat from decentralized energy e.g. hospital/leisure centre/large manufacturer?</p>	<p>Yes/No</p>	<p>Further information required.</p>			
<p>3. Climate change Adaptation</p>	<p>This objective is not assessed as part of the broad locations SA. Flooding is considered separately and other climate change adaptation techniques will be a fundamental part of the design of individual developments rather than site specific.</p>				
<p>4. Flooding Does the broad location contain areas in Flood Zones 2, 3a or 3b? If so give approximate percentage of the site affected.</p>	<p>Flood zone 2</p>	<p>Flood zone 3a</p>	<p>Flood zone 3b</p>	<p>GREEN There is a watercourse running through G2 from the South East to the West passing to the north of the existing built up area. This has resulted in a narrow channel of land falling within flood zone 3b (less than 5% of the total area). The rest of the site is unconstrained in respect of flood risk. The site offers potential connections to Horsbere flood attenuation scheme, and opportunities for betterment with regard to Horsbere for further flood protection of properties downstream</p>	
<p>5 & 6 Natural Resources 5a Is the site brownfield or Greenfield (if Greenfield state approximate percentage of total area)? 5b Does the site contain any existing buildings which could be refurbished? 5c Does the site contain landscape designations e.g. AONB, local designation. 5d Overall judgement of landscape sensitivity</p>	<p>Greenfield 95+%</p>	<p>Predominantly Greenfield with a few scattered residential and agricultural buildings</p>	<p>This objective will be considered at any later stage in the SA/SEA of sites to be taken forward for further consideration</p>	<p>RED NOT ASSESSED</p>	<p>GREEN/AMBER GREEN</p>
<p>The south eastern boundary adjoins the AONB The north western boundary adjoins the locally designated Special Landscape Area, however they are separated by the M5 Site G4 – overall rating of sensitivity; low There is an existing strong green corridor running through this site from east to west following the Horsebere Brook. This corridor borders the north</p>					

value.			an open landscape around the existing structures.	
7b Is the broad location within (or partly within) a Conservation Area	No			GREEN
8. Transport				
8a Is the broad location in, or close to, an area of high accessibility to key facilities	Yes/No		The site is on the edge of Brockworth where there is a range of key facilities at the district centre, reducing the need to travel to access essential services. The site is reasonably close to the main urban centre of Gloucester where a wide range of key facilities are available. Access to Cheltenham and Gloucester is possible via Bus Route No.10	GREEN
8b Is the site well connected to the transport infrastructure network, and will the location provide opportunities to support travel by non car modes.	Yes/No		This broad location is adjacent to a public transport corridor. It is therefore expected that the location will provide opportunities to travel by non-car modes. Helping to support LTP3's objective to reduce the need to travel by private car and reducing traffic related greenhouse gas emissions.	GREEN
8c Are there any Highway Junction capacity constraints?	Yes		<p><u>Problems:</u></p> <p>Congestion on the A46 corridor, including the A46 / A417 junction, with limited scope for capacity enhancements due to physical constraints of frontage development.</p> <p>Congestion on local roads through Brockworth and Hucclecote, with limited scope to secure significant capacity enhancements.</p> <p>Limited access to rail network.</p> <p>Access arrangements at Western end of the site could impact upon access roads to Gloucester Business Park.</p> <p><u>Possible solutions/opportunities:</u></p> <p>Opportunity to integrate LTP3 Park and Ride proposal within the development.</p> <p>Potential for development access road to form link from A46 to Gloucester Business Park, relieving the centre of Brockworth (but could be a constraint to the development layout).</p>	

			Strengthening of the "10" as a commercial bus service.	
12. Waste and Pollution				
9a Is the site close to or within a reduced air quality area?	Yes/No		This broad location is enclosed on two sides by the M5 and the A417, traffic associated air pollution and noise nuisance may be an issue close to these boundaries, parts of the site could therefore be more suitable for employment use rather than residential.	
9b Is the site close to an existing or planned waste processing facility?	No		No	
10. Economy 10a Is the broad location suitable for a mix of employment opportunities?	No		Employment uses would be suitable on westernmost parcel of land in G4. Site is bounded by transport corridors & therefore easily accessible by HGVs, as well as remote from existing housing & would be suitable to bring forward for employment once Gloucester Business Park is built out.	AMBER
10b Is the broad location close to a range of existing employment opportunities?	Yes		Sites to north of existing residential at Brockworth not easily accessible for lorries/HGVs and leans more towards suitability for residential use.	
14 City and Town Centres Does the site have the ability to create and sustain a vibrant community? Will it support the existing town and city centre facilities or will it help unlock identified needed facilities?	Support Existing Yes/No		This broad location site is close to Brockworth's Gloucester Business Park and is reasonably close to the Gloucester principle urban area where there are existing employment opportunities. The close proximity of Brockworth Business and Enterprise College will also be positive in helping link skills and education with local employment opportunities. Site is well connected to Brockworth which has a range of facilities, the site is also reasonably close to the main Gloucester urban centre and therefore development of this site is expected to be positive as regards this objective.	GREEN
12. and 13. Sustainable Communities	These objectives will be considered at a later stage in the SA/SEA process during the more detailed design and masterplanning stages.			

14. Health			
14 Could development of the site improve access to local health facilities and improve health inequalities?	Yes/No	There are sports fields close to the site which could allow greater accessibility to sport and exercise thereby reducing health inequalities. Access to health facilities is good. There is a doctors surgery in Brockworth and two doctors surgeries in nearby Hucclecote. A&E, maternity and general surgery provided at Gloucester Royal Hospital in Gloucester City Centre.	GREEN
15. Housing	All the sites are likely to be able to deliver some identified housing need. The tenure split, ratio of affordable to open market, size and density of housing would form part of a more detailed assessment at a later stage in the SA/SEA process.		
16. Green Space			
16a Does the location provide the opportunity for access to the countryside and natural environment?	Yes/No	Site offers opportunities to access Churchdown Hill and Horsbere Brook flood attenuation scheme as well as open countryside to north of the site.	GREEN
16b Does the site contain strategic open green space?	Yes/No	The site itself does not contain strategic open greenspace. There are allotments adjacent to part of the site boundary, development could provide the opportunity to provide more allotment/community garden space. The surrounding area of Brockworth also contains sports and playing fields which may be of strategic importance. There may be GI opportunities to improve the M5 junction 11.	
16c Will it ensure existing open spaces are protected and enhanced?	Yes/No		
17. Education			
17 a Will the site allow good access to educational facilities or the ability to support existing facility or a new facility?	Yes	The site offers excellent access to education and skills development. There are a number of nursery and primary schools in Brockworth catering for up to 11 year olds. The site is also adjacent to Brockworth Enterprise and Community Comprehensive School and Business College. The site is close to the public transport corridor – accessibility to the main urban centre of Gloucester and education/skills providers is therefore very good <u>Secondary Schools</u> Brockworth Secondary School within 20 minutes walk of eastern and northern part of site <u>Primary Schools</u>	GREEN

		Brockworth Primary School within 20 minutes walk of eastern and northern part of site	
18. Culture and Tourism	The impact on this SA objective will form part of a more detailed SA/SEA assessment later in the JCS process.		
19. Deliverability of Site and other strategic spatial options?			
19a. Are there any known needs for essential infrastructure?		The requirements for infrastructure are currently subject to initial appraisal by infrastructure providers.	
19b. Will development of the site ensure greater self containment of the urban areas?	Yes/No	<p>WHOLE TEAM</p> <p>The site is reasonably close to Gloucester city centre and for this reason could perform better than some of the other broad location areas which are some distance from the main urban centres. This broad location is enclosed by major roads on two sides which form distinct boundaries.. Therefore its development would be unlikely to form a precedent for any northward sprawl at adjacent locations because of the long term barrier of the A417</p>	GREEN
19c. Is the site within the Green Belt (summarise findings of greenbelt review).	Yes	<p>The whole of this site is within the Greenbelt. The recent Greenbelt review undertaken by Entec considered this broad location as three separate parcels of land. SE9 is effectively remnant land from the development of the junction between the M5 and the A417 and comprises one large field and peripheral scrubland. SE8 and SE7 land to the south of the A417 and west of Brockworth Road.</p> <p>All three sites were found to have a relatively limited contribution towards the function of the greenbelt.</p>	AMBER
<p>Conclusion:</p> <p>G4 land East of Gloucester. Has scored extremely well in relation to most of the assessed sustainability objectives. Its sympathetic development could result in significant biodiversity improvements. The site is largely unconstrained by flood risk, and although currently designated as greenbelt its landscape sensitivity has been assessed as low and a recent Entec study has also suggested that it does not make a significant contribution towards this objective. The westernmost parcel of land is probably more appropriate for industrial use with potential for residential on land to the south of the A417 and west of Brockworth Road. The site is well connected to existing employment and services/facilities, and is reasonably close to Gloucester city, with good transport connections. The results of this initial SA appraisal suggest that the site should be taken forward for further consideration as part of the JCS site search.</p> <p>County Libraries info: Encourage early and open dialogue between potential infrastructure / service providers, particularly where alternative / shared services solution may be possible. From the library service perspective examples include:- better alignment with public transport to</p>			

improve accessibility and the expansion of co-location opportunities (e.g. with youth services, children's centres, Police, GP and health care, district and / or town council services, and volunteer / 3rd sector activities etc...)

If strategic-scale development growth is taken forward in this locality (several thousand units across G3 and G4 and / or C6) careful consideration will need to be given to a review of the form and status of the proposed local tiered libraries. This may also result in new (on-site) facilities and / or significant re-modelling of the existing provision.

JCS Sustainability Appraisal – Broad Locations

Site Reference No: G5 Land East of Gloucester at Brockworth

Total Area of Site 230.18 ha

SA Objective/Indicator	Notes and Commentary	Performance
Biodiversity		
1a Does the broad location contain sites of biodiversity value e.g. SSSI?	No Tewkesbury part of site has no biodiversity designations/value Key wildlife site on northern boundary of Stroud District	AMBER
1b Is the broad location within 5km of a European Designated Site (SAC or SPA)	Yes/No/ The southern edge of the site is within 5km of part of the Cotswolds Beeches SAC (although they are separated by the M5 transport corridor)	AMBER
1c Are there designated BAP Priority Habitats on the site?	Yes/No Lowland Meadows BAP habitats are situated on the eastern and western site boundaries	RED
1d Would development of the site be likely to lead to fragmentation of important habitats	Yes/No	
1e Will development of the site offer opportunities to link important habitats/create wildlife corridors?	Yes/No Possible opportunity to provide connectivity to Beech woodlands on scarp slope of Cotswolds AONB	AMBER
Overall likely biodiversity impact?		AMBER/RED
2. Climate Change Mitigation	For the purposes of broad location SA this objective considers renewable energy potential only. Reduction of carbon emissions through location and transport are dealt with under SA Objective 8. Design of development to reduce carbon will form part of later detailed masterplanning stage of selected broad locations.	
2a Does the site have any renewable energy resource potential?	Yes/No	
2b Is there large energy/heat demand potential from	Yes/No WHOLE TEAM	

facilities/premises in the area that could benefit from excess heat from decentralized energy e.g. hospital/leisure centre/large manufacturer?						
3. Climate change Adaptation	This objective is not assessed as part of the broad locations SA. Flooding is considered separately and other climate change adaptation techniques will be a fundamental part of the design of individual developments rather than site specific.					
4. Flooding Does the broad location contain areas in Flood Zones 2, 3a or 3b? If so give approximate percentage of the site affected.	Flood zone 2	Flood zone 3a	Flood zone 3b	The area is not subject to any flood constraints		
		No		GREEN		
5 & 6 Natural Resources						
5a Is the site brownfield or Greenfield (if Greenfield state approximate percentage of total area)?	Greenfield 30 %			Site within Tewkesbury Borough being redeveloped for housing and employment purposes formerly an old airfield. Already a commitment with outline and reserved matters permissions. Land within Stroud district is green field.	??	
5b Does the site contain any existing buildings which could be refurbished?	Yes/No			This objective will be assessed at a later stage in the SA/SEA of selected broad location areas to take forward for further consideration	NOT CONSIDERED	
5c Does the site contain landscape designations e.g. AONB, local designation.	No			No landscape designations within Tewkesbury Borough part of site. Southern boundary of site adjoins the nationally designated AONB	AMBER	
5d Overall judgement of landscape sensitivity				Not assessed – however it should be noted most of the broad location is either developed or already allocated.		
5e Does the site contain high grade agricultural land – Grades 1,2 and 3a (if give the approximate percentage)	No Grade 1 %	No Grade 2 %	Yes Grade 3 5%	Predominantly classified as non-agricultural. Some land classified Grade 3 to the south of the site. High grade agricultural land is not a constraint for this site.	GREEN	
5f Would development of	Yes/No			Possibly there are potential contaminated land concerns resulting from the		

the site help clean up contaminated land or eradicate invasive alien plants e.g. Japanese Knotweed?			presence of former corn mills and filled ground.	
6a Are there known mineral deposits? Are these viable and will they need to be extracted before development?	Yes/No		Further information required.	
6b Are there any water supply constraints?	Yes/No		Further information required.	
6c Are there any Sewerage Network/Capacity constraints	Yes/No		Further information required.	
Historic Environment				
7a Does the site contain areas of archaeological significance or historic value.	Yes/No		Three listed buildings south west of the site. Buildings are located on the edge of the urban area. Development of this site would not necessarily conflict or prejudice the status and setting of the listed buildings.	
7b Is the broad location within (or partly within) a Conservation Area	Yes/No		No	
8. Transport				
8a Is the broad location in, or close to, an area of high accessibility to key facilities	Yes/No		Northern two thirds of site currently being built out for housing & employment and part as Brockworth District Centre with supermarket, petrol filling station, tennis centre, gymnasium, pub and travel lodge hotel plus district centre shopping facility. Further services and facilities to be found at Gloucester City Centre to the west.	GREEN
8b Is the site well connected to the transport infrastructure network, and will the location provide opportunities to support	Yes/No		Northern part of site well related to existing build up area of Brockworth. Good connections to A417 and M5 motorway network at Junction 11A for cars/lorries. Located in close proximity to existing high frequency bus services between Gloucester and Cheltenham. Southern area of site more remote, stretching towards Upton St Leonards, and away from major	AMBER

travel by non car modes.		transport infrastructure. Site does not provide well for sustainable modes of transport such as walking and cycling.	
8c Are there any Highway Junction capacity constraints?	Yes/No		
13. Waste and Pollution			
9a Is the site close to or within a reduced air quality area?	No	No but large manufacturing facility adjacent to north eastern boundary of the site at Brockworth.	GREEN
9b Is the site close to an existing or planned waste processing facility?	No	No	GREEN
10. Economy 10a Is the broad location suitable for a mix of employment opportunities?	Yes/No	Tewkesbury Borough Site already partly built out for range of B1, B2 & B8 uses. Stroud site not suitable for further employment use owing to poor highway infrastructure to that part of the site and nature conservation constraints.	GREEN
10b Is the broad location close to a range of existing employment opportunities?	Yes/No	Employment opportunities at Gloucester Business Park, Barnwood Employment Area and Gloucester City Centre all accessible by no. 10 bus.	GREEN
15 City and Town Centres Does the site have the ability to create and sustain a vibrant community? Will it support he existing town and city centre facilities or will it help unlock identified needed facilities?	Support Existing Yes/No	Unlock new Yes/No Broad location is already mainly developed or allocated.	GREEN
12. and 13. Sustainable Communities	These objectives will be considered at a later stage in the SA/SEA process during the more detailed design and masterplanning stages.		
14. Health			
14 Could development of	Yes/No	Existing doctors and dentists surgeries at Brockworth. Increased population	GREEN

the site improve access to local health facilities and improve health inequalities?		could result in GP's investing in out patient facilities provided at surgeries helping improve access to services and reduce health inequalities. However most of site has come forward therefore further development of site unlikely to yield additional benefits in this area. A&E and other hospital facilities available at Gloucester Royal in Gloucester City Centre.	
15. Housing	All the sites are likely to be able to deliver some identified housing need. The tenure split, ratio of affordable to open market, size and density of housing would form part of a more detailed assessment at a later stage in the SA/SEA process.		
16. Green Space			
16a Does the location provide the opportunity for access to the countryside and natural environment?	Yes/No	Links to Cotswolds Beech Woods	RED
16b Does the site contain strategic open green space?	Yes/No	No	RED
16c Will it ensure existing open spaces are protected and enhanced?	Yes/No		
17. Education			
17 a Will the site allow good access to educational facilities or the ability to support existing facility or a new facility?	Yes/No	<u>Secondary Schools</u> Brockworth Secondary School <i>Not within 20 minute walking distance of a secondary school</i> <u>Primary Schools</u> New primary school proposed for Coopers Edge, meanwhile Brockworth and Castle Hill Primary Schools in Brockworth & Abbeymead primary school across motorway in Abbeymead. <i>Most of site not within 20 minute walking distance of existing primary schools</i> Further education provided at Gloucestershire College at campuses in Gloucester & Cheltenham	AMBER
18. Culture and Tourism	The impact on this SA objective will form part of a more detailed SA/SEA assessment later in the JCS process.		

19. Deliverability of Site and other strategic spatial options?			
19a Are there any known needs for essential infrastructure?		Already implemented owing to site being predominantly built out	GREEN
19b Will development of the site ensure greater self containment of the urban areas?	Yes/No	No development of site results in sprawl to east of Gloucester - filling in the gap between the motorway and Cotswolds AONB. Development in Stroud District would fill gap between Brockworth and Upton St. Leonards who see themselves as totally separate from Gloucester and who orientate themselves towards Painswick and Stroud. Site not within Green Belt	RED
19c Is the site within the Green Belt (summarise findings of greenbelt review).	Yes/No		GREEN
<p>Conclusion:</p> <p>Site already two thirds built out having been allocated by Tewkesbury Borough since early 1990's for strategic development owing to proximity to Gloucester City.</p> <p>Site is providing housing and employment land, Gloucester Business Park is particularly successful owing to strategic highway infrastructure links put in before development of site began.</p> <p>Residential is poorly sited, does not relate to any existing communities and offers little opportunity for sustainable travel. A primary school should be coming forward but is not yet under construction.</p> <p>Site of nature conservation interest in Stroud but Tewkesbury site offers little in terms of biodiversity or opportunities to improve biodiversity.</p> <p>G5 Land East of Gloucester. This broad search area also scores well against the sustainability objectives. However, much of this broad area has already been developed or is already allocated for development. Part of this broad location lies outside the JCS area within Stroud, however the Stroud site is considered to be less suitable for further development owing to poor highway infrastructure to that part of the site and nature conservation constraints. For these reasons it might make sense to remove this site from the broad location search.</p>			

JCS Sustainability Appraisal – Broad Locations

Site Reference No: G6 Land South of Gloucester at Brookthorpe with Whaddon

Total Area of Site 483.15 ha

SA Objective/Indicator	Notes and Commentary	Performance
Biodiversity		
1a Does the broad location contain sites of biodiversity value e.g. SSSI?	No	AMBER
1b Is the broad location within 5km of a European Designated Site (SAC or SPA)	Yes	AMBER
1c Are there designated BAP Priority Habitats on the site?	No	AMBER
1d Would development of the site be likely to lead to fragmentation of important habitats	Yes/No	
1e Will development of the site offer opportunities to link important habitats/create wildlife corridors?	Yes/No	GREEN
Overall likely biodiversity impact?	The area to the west of the A4173 Stroud Road which divides this plot would probably be less vulnerable in terms of impact on biodiversity value.	AMBER
2. Climate Change Mitigation	For the purposes of broad location SA this objective considers renewable energy potential only. Reduction of carbon emissions through location and transport are dealt with under SA Objective 8. Design of development to reduce carbon will form part of later detailed masterplanning stage of selected broad locations.	
2a Does the site have any renewable energy resource potential?	Yes	Some wind potential, no hydropower potential, High energy crop potential
2b Is there large energy/heat demand	Yes/No	

<p>potential from facilities/premises in the area that could benefit from excess heat from decentralized energy e.g. hospital/leisure centre/large manufacturer?</p>			
<p>3. Climate change Adaptation</p>	<p>This objective is not assessed as part of the broad locations SA. Flooding is considered separately and other climate change adaptation techniques will be a fundamental part of the design of individual developments rather than site specific.</p>		
<p>4. Flooding Does the broad location contain areas in Flood Zones 2, 3a or 3b? If so give approximate percentage of the site affected.</p>	<p>Flood zone 2</p>	<p>Flood zone 3a</p>	<p>Flood zone 3b</p> <p>Yes Less than 5%</p>
<p>5 & 6 Natural Resources</p>			
<p>5a Is the site brownfield or Greenfield (if Greenfield state approximate percentage of total area)?</p>	<p>Greenfield 90 %</p>	<p>Predominantly Greenfield</p>	
<p>5b Does the site contain any existing buildings which could be refurbished?</p>	<p>No</p>	<p>No</p>	
<p>5c Does the site contain landscape designations e.g. AONB, local designation.</p>	<p>Yes</p>	<p>All of the site falls within the County Structure Plan local designated Special Landscape Area. The County Structure Plan defines SLA's as areas that are not designated as AONB but are of a comparable high quality and require special attention in the implementation of planning policy. The part of the city which falls within the Gloucester City boundary forms part of the local designated Landscape Conservation Area.</p> <p>That part of the site within Stroud District is within Stroud Special Landscape Area</p>	
<p>5d Overall judgement of landscape sensitivity</p>	<p>The historic hamlet of Whaddon stands on a low ridge close to the northern end of the area. This ridge encloses an area of land adjacent to the built up</p>		<p>RED</p>

			area of Tuffley. The escarpment and Robinswood Hill are dominant features. The area is flat and has a relatively open nature, this along with its visibility from the AONB make it particular susceptible to inappropriate development. The landscape is under particular pressure from the expansion of existing settlement at Stroud, Stonehouse and Gloucester. New development from these settlements has already degraded some areas of the landscape.			
5e Does the site contain high grade agricultural land – Grades 1,2 and 3a (if give the approximate percentage)	No Grade 1	No Grade 2	Yes Grade 3 95%	Predominantly Grade 3 Agricultural Land	AMBER	
5f Would development of the site help clean up contaminated land or eradicate invasive alien plants e.g. Japanese Knotweed?	Yes/No	There are no potential contamination concerns at this time.				
6a Are there known mineral deposits? Are these viable and will they need to be extracted before development?	Yes/No					
6b Are there any water supply constraints?	Yes/No	SIDP: local reinforcements required, but further evaluation also in progress				
6c Are there any Sewerage Network/Capacity constraints	Yes/No	SIDP: high requirements anticipated				
Historic Environment						
7a Does the site contain areas of archaeological significance or historic value.	Yes	Scheduled Ancient Monument at Sneedhams Green Listed Buildings at Winneycroft Farm including a Cider Press Area of principal archaeological interest Church of St. Margaret within the centre of the site with numerous listed buildings throughout the site. Historic emphasis is prominent throughout the site which should be protected.				AMBER
7b Is the broad location within (or partly within) a	Yes/No	No				

Conservation Area			
8. Transport			
8a Is the broad location in, or close to, an area of high accessibility to key facilities	No	Major site abutting the M5 to the south, railway line to the west and Robinswood Hill to the north, all acting as a significant access barrier. Limited local services available at Abbeydale District Centre. Remote from the City Centre to access a wider range of key shops, services and facilities.	RED
8b Is the site well connected to the transport infrastructure network, and will the location provide opportunities to support travel by non car modes.	No	The site is subject to a number of significant access barriers that limit the availability of both private and public transport infrastructure (railway line, M5 motorway, Robinswood Hill). Stroud Road (B4072) dissects the site north to south. The site is located remote the City Centre for access to a wider range of shops, services and facilities. Poor provision for pedestrians and cyclists.	RED
8c Are there any Highway Junction capacity constraints?	Yes/No	<p><u>Problems:</u> M5 and railway line form significant barriers to East – West movement from the site (e.g. to employment opportunities at Waterwells Business Park).</p> <p>A4173 corridor to Gloucester is congested in peak periods with limited opportunity for capacity improvements due to frontage development. St Barnabas Junction is a significant constraint (A4173 / A38).</p> <p>Junction improvements required onto Haresfield Lane</p> <p>Would require major development to provide sufficient infrastructure funding – e.g. in new link road across the railway</p> <p><u>Possible solutions/opportunities:</u> Potential to strengthen Stroud to Gloucester bus services.</p> <p>Potential railway station at Hunts Grove to provide good access to rail services.</p>	RED
14. Waste and Pollution			
9a Is the site close to or within a reduced air quality area?	No		
9b Is the site close to an existing or planned waste processing	Yes/No		

facility?				
10. Economy 10a Is the broad location suitable for a mix of employment opportunities?	Yes/No	Access is not suitable for large HGVs therefore site would only really be suitable for B1 uses. Not a great site for employment uses as not well sited for strategic highway network.		RED
10b Is the broad location close to a range of existing employment opportunities?	Yes/No	Site does not relate well to existing employment sites – closest employment sites lie along the Canal Corridor to the south of the City and within Gloucester City Centre some 3/4 miles to the north		RED
16 City and Town Centres Does the site have the ability to create and sustain a vibrant community? Will it support the existing town and city centre facilities or will it help unlock identified needed facilities?	Support Existing Yes/No	Unlock new Yes/No The site is some distance from the main urban centre. ~There is a danger that large scale development will increase the need to build out of centre facilities and services to service the residents of any new large scale housing development which would detract from the objective to support existing city centre facilities.		RED
12. and 13. Sustainable Communities		These objectives will be considered at a later stage in the SA/SEA process during the more detailed design and masterplanning stages.		
14. Health				
14 Could development of the site improve access to local health facilities and improve health inequalities?	Yes/No	Only 1 small doctors branch surgery in Tuffley, would need to access facilities further to the north in City Centre. Development could provide facilities but no evidence that existing practices are willing to invest in this area. A&E facilities at Gloucester Royal Hospital		AMBER
15. Housing		All the sites are likely to be able to deliver some identified housing need. The tenure split, ratio of affordable to open market, size and density of housing would form part of a more detailed assessment at a later stage in the SA/SEA process.		
16. Green Space				
16a Does the location	Yes	Yes		GREEN

<p>provide the opportunity for access to the countryside and natural environment?</p>		<p>Potential Green Infrastructure links over railway and potential flood betterment for properties down stream.</p>	
<p>16b Does the site contain strategic open green space?</p>	<p>Yes/No</p>	<p>Yes protected playing field at Wynstones School.</p>	<p>RED</p>
<p>16c Will it ensure existing open spaces are protected and enhanced?</p>	<p>Yes/No</p>	<p>Further information required.</p>	
<p>17. Education</p>			
<p>17 a Will the site allow good access to educational facilities or the ability to support existing facility or a new facility?</p>	<p>Yes/No</p>	<p><u>Secondary Schools</u> St. Peters Catholic Secondary School & sixth form Stroud Rd, takes children from Catholic primaries across the County & not always available for those who live in close proximity to it. Beaufort Community School Tuffley, large oversubscribed 11-18 comprehensive Gloucester Academy at Sainbridge <i>Western part of site within 20 minute walking time of 2 no. secondary schools</i></p> <p><u>Primary Schools</u> Robinswood Primary School at Matson for north eastern part of site Tuffley & Harewood Primaries for western part of site Kingsway Primary not accessible owing to railway line <i>Western part of site within 20 minute walking time of 2 no. primary schools</i></p> <p>County Info: If developed along with G7 further consideration will need to be given to the cumulative impact upon the existing early year's / primary network. Particularly, when reviewing on-site or off-site options and / or when taking into account 'existing capacity' with the modelling (size and scale) of any new on-site provision.</p> <p>Similarly, the cumulative impact upon the existing secondary network (if developed alongside G7) will be an important issue as off-site provision is the most likely solution in this instance.</p> <p>Early advice on the requirements of other infrastructure services would be welcomed so as to give as much opportunity as possible to explore a more</p>	<p>AMBER</p>

		integrated / shared services solution (the development of the community hub model).	
18. Culture and Tourism	The impact on this SA objective will form part of a more detailed SA/SEA assessment later in the JCS process.		
19. Deliverability of Site and other strategic spatial options?	Requirements currently subject to initial appraisal by infrastructure providers.		
19a Are there any known needs for essential infrastructure?		The requirements for infrastructure are currently subject to initial appraisal by infrastructure providers.	
19b Will development of the site ensure greater self containment of the urban areas?	Yes/No	This broad location is some distance from the core urban centre of Gloucester City. The distance to the main facilities, services and employment centre is likely to detract from efforts to increase the containment and vitality of the city centre. Development of this site is likely to further increase linear urban sprawl and lead to a greater coalescence between the settlements of Stroud and Gloucester. Much of the site is separated from the built up area due to the proximity of the LNR. The potential of constructing a new train station at Quedgely, south of Gloucester in the Stroud District has been the subject of discussions in the past, however this might have an even greater negative impact in terms of creating a commuter conurbation with little or no sense of community identity.	RED
19c Is the site within the Green Belt (summarise findings of greenbelt review).	Yes/No	Site not within the Green Belt	GREEN
<p>Conclusion:</p> <p>G6 Land South of Gloucester. This broad location area performed quite poorly against many of the sustainability objectives. G6 is subject to landscape designations owing to proximity of lower scarp slopes of Cotswolds AONB escarpment and presence of Robinswood Hill outlier which dominate the topography of this broad location. The site's biodiversity value is not however considered to be of high importance, although there could potentially be opportunities to enhance biodiversity.</p> <p>Site is not particularly suitable for employment development owing to poor highway infrastructure for accessing the site and relative remoteness of site from trunk roads. A major issue for any large scale development is that the area is subject to a number of significant access barriers that limit the availability of both private and public transport infrastructure. The site is a long distance from the city centre for access to shops, services and facilities. Development of this site could have a detrimental impact on the strategic aim to create and sustain a vibrant community, could possibly increase inequalities especially for those without access to a private car, and would constitute</p>			

a continued urban sprawl away from the main city centre.

County Libraries info:

Encourage early and open dialogue between potential infrastructure / service providers, particularly where alternative, integrated / shared services solution may be possible. From the library service perspective examples include:- better alignment with public transport to improve accessibility and the expansion of co-location opportunities (e.g. with youth services, children's centres, Police, GP and health care, district and / or town council services, and volunteer / 3rd sector activities etc...)

If strategic-scale development growth is taken forward in this locality (several thousand units across G6 and G7) careful consideration will need to be given to a review of the form and status of the proposed local tiered libraries. This may also result in new (on-site) facilities and / or significant re-modelling of the existing provision.

JCS Sustainability Appraisal – Broad Locations

Site Reference No: G7 Land South of Gloucester at Hardwicke

Total Area of Site 185.53

SA Objective/Indicator	Notes and Commentary	Performance
Biodiversity		
1a Does the broad location contain sites of biodiversity value e.g. SSSI?	No	GREEN
1b Is the broad location within 5km of a European Designated Site (SAC or SPA)	No	GREEN
1c Are there designated BAP Priority Habitats on the site?	No	AMBER
1d Would development of the site be likely to lead to fragmentation of important habitats	Yes	RED
1e Will development of the site offer opportunities to link important habitats/create wildlife corridors?	No	RED
Overall likely biodiversity impact?	High (Red), Medium (Amber), Low (Green) There is a patchwork of small fields with semi-improved, improved and arable. Significant number of veteran trees and useful pockets of woodland. Coupled with old orchards, abandoned pasture, a myriad of small ponds, the canal and associated habitats probably make this one of the most important broad location sites in terms of local biodiversity. I	RED
2. Climate Change Mitigation	For the purposes of broad location SA this objective considers renewable energy potential only. Reduction of carbon emissions through location and transport are dealt with under SA Objective 8. Design of development to reduce carbon will form part of later detailed masterplanning stage of selected broad locations.	
2a Does the site have any renewable energy resource potential?	Yes/No	Limited wind resource, no hydropower potential, High energy crop potential
2b Is there large	Yes/No	WHOLE TEAM

<p>energy/heat demand potential from facilities/premises in the area that could benefit from excess heat from decentralized energy e.g. hospital/leisure centre/large manufacturer?</p>			
<p>3. Climate change Adaptation</p>	<p>This objective is not assessed as part of the broad locations SA. Flooding is considered separately and other climate change adaptation techniques will be a fundamental part of the design of individual developments rather than site specific.</p>		
<p>4. Flooding Does the broad location contain areas in Flood Zones 2, 3a or 3b? If so give approximate percentage of the site affected.</p>	<p>Flood zone 2</p>	<p>Flood zone 3a</p>	<p>Flood zone 3b</p>
	<p>Yes</p>	<p>Yes</p>	<p>Yes</p>
<p>5 & 6 Natural Resources</p>			
<p>5a Is the site brownfield or Greenfield (if Greenfield state approximate percentage of total area)?</p>	<p>Greenfield 60 %</p>		
<p>5b Does the site contain any existing buildings which could be refurbished?</p>	<p>Predominantly Greenfield with limited residential & large employment site in the centre</p>		
<p>5c Does the site contain landscape designations e.g. AONB, local designation.</p>	<p>Yes/No</p>		
<p>5d Overall judgement of landscape sensitivity</p>	<p>This will be assessed at a later stage in the SA/SEA process for the broad locations which are taken forward for further consideration.</p>		
	<p>None identified on Stroud District Plan proposals map</p>		
	<p>GREEN</p>		
	<p>ANNICE/TRACEY Red – High, Amber – Medium, Green – Low From Holly's notes: Hardwick Court – generally flat area of pastoral farmland including Hardwick Court with its parkland setting. Hunts Grove – low lying area of pastoral landscape has a gentle rise running in a NW-SE direction through the middle which divides it visually, this is considered sensitive to development. Hunts Grove ridge features a small but prominent woodland.</p>		

5e Does the site contain high grade agricultural land – Grades 1,2 and 3a (if give the approximate percentage)	No Grade 1 %	No Grade 2 %	Yes Grade 3 95%	Predominantly Grade 3 Agricultural	AMBER
5f Would development of the site help clean up contaminated land or eradicate invasive alien plants e.g. Japanese Knotweed?	There are no potential contamination concerns at this time.				
6a Are there known mineral deposits? Are these viable and will they need to be extracted before development?	Further information required.				
6b Are there any water supply constraints?	Further information required.				
6c Are there any Sewerage Network/Capacity constraints	Further information required.				
Historic Environment					
7a Does the site contain areas of archaeological significance or historic value.	Church of St. Nicholas and numerous listed buildings to the north of the site. Sensitive historic heritage which should be protected/enhanced from future development.				
7b Is the broad location within (or partly within) a Conservation Area	No				
8. Transport					
8a Is the broad location in, or close to, an area of high accessibility to key facilities	This broad location is over four miles from the southern edge of the main city centre area. Significant development of this broad location is considered likely to encourage more car journeys, lead to lower levels of self-containment and increase transport related greenhouse gas emissions. Due to the distance the TTWA is likely to increase and this would be most likely be by car modes rather than through the required modal shift to public transport, cycling and walking.				RED

<p>8b Is the site well connected to the transport infrastructure network, and will the location provide opportunities to support travel by non car modes.</p>	<p>Yes/No</p>	<p>There is no space available to improve connections into the city centre. There is already further development allocated adjacent to this broad location at Hunts Grove which will put additional pressure on the road network. The distance from the urban centre means that opportunities to improve the cycle/pedestrian network to encourage non-car modes of transport are limited. There is a park and ride at Waterwells into Gloucester which could cut commuting distances, and help reduce increased congestion into the city centre.</p>	<p>RED</p>
<p>8c Are there any Highway Junction capacity constraints?</p>	<p>Yes/No</p>	<p>Current development is already causing pressure on the M5 junction 12, large scale new development at this broad location is expected to bring the network to capacity on strategic roads.</p> <p>County Info: M5 J12 – 2011 improvement scheme has provided increased capacity. Development might erode these benefits and result in the need for further improvements;</p> <p>Cross Keys Roundabout (A38 / B4008) improvement to be funded by Hunts Grove, but new development would place greater pressure on this junction;</p> <p>Limited opportunity for East – West movement due to constraints offered by the railway and the M5.</p>	<p>RED</p>
<p>15. Waste and Pollution</p>			
<p>9a Is the site close to or within a reduced air quality area?</p>	<p>No</p>	<p>No</p>	<p>GREEN</p>
<p>9b Is the site close to an existing or planned waste processing facility?</p>	<p>Yes/No</p>	<p>Yes, Javelin Park to east of Junction 12 of M5 is a proposed site for a waste facility in County Waste & Minerals Local Plan.</p>	
<p>10. Economy 10a Is the broad location suitable for a mix of employment opportunities?</p>	<p>Yes/No</p>	<p>Site already includes employment land at Quedgley Trading Estate West which still has some sites to be built out. Site has good access to motorway network with Jctn 12 in close proximity. No constraints on type of employment that could be located at this site. (LMF)</p>	<p>GREEN</p>

10b Is the broad location close to a range of existing employment opportunities?	Yes/No	Existing employment opportunities at Waterwells Business Park to south of Gloucester and at nearby Quedgeley District Centre.	GREEN
17 City and Town Centres Does the site have the ability to create and sustain a vibrant community? Will it support the existing town and city centre facilities or will it help unlock identified needed facilities?	Support Existing No	Unlock new No Development of this site could have detrimental impact on the strategic aim to create and sustain a vibrant community. The distance from the city centre means that it will not support existing town and city centre facilities and is likely to decrease accessibility unless new facilities, services and infrastructure are factored into any development proposals. This would have a negative impact on objective 11. Development of this site is not expected to reduce inequalities and could possible increase inequalities especially for those without access to a private car.	RED
12. and 13. Sustainable Communities	These objectives will be considered at a later stage in the SA/SEA process during the more detailed design and masterplanning stages.		
14. Health			
14 Could development of the site improve access to local health facilities and improve health inequalities?	Yes/No	Existing health and dental facilities at Quedgeley at capacity with little opportunity to expand owing to physical site constraints. Distance to city centre to access hospitals and major health facilities is an issue	AMBER/RED
15. Housing	All the sites are likely to be able to deliver some identified housing need. The tenure split, ratio of affordable to open market, size and density of housing would form part of a more detailed assessment at a later stage in the SA/SEA process.		
16. Green Space			
16a Does the location provide the opportunity for access to the countryside and natural environment?	Yes/No	Western boundary of site lies adjacent to canal and towpath. M5 on south eastern boundary provides barrier to open countryside and Cotswolds AONB beyond.	AMBER
16b Does the site contain strategic open green	Yes	The site contains a protected outdoor play space	

space?			
16c Will it ensure existing open spaces are protected and enhanced?	Yes/No		
17. Education			
17a Will the site allow good access to educational facilities or the ability to support existing facility or a new facility?	No	<p><u>Secondary Schools</u> Severn Vale – 11-16 school already oversubscribed Beaufort School not within walking distance <i>Northern part of site within 20 minute walking time of 1 no. secondary school (existing site is constrained for further development)</i></p> <p><u>Primary Schools</u> Hardwicke Primary School – not within walking distance of the eastern part of site Fieldcourt School - not within walking distance of the eastern part of site <i>Northern part of site within 20 minute walking time of 2 no. primary schools</i> Further education facilities provided at Gloucestershire College at Gloucester Docks – not accessible by walking</p> <p>County Info: If developed along with G6 further consideration will need to be given to the cumulative impact upon the existing early year's / primary network. Particularly, when reviewing on-site or off-site options and / or when taking into account 'existing capacity' with the modelling (size and scale) of any new on-site provision.</p> <p>Similarly, the cumulative impact upon the existing secondary network (if developed alongside G6) will be an important issue as off-site provision is the most likely solution in this instance.</p> <p>Early advice on the requirements of other infrastructure services would be welcomed so as to give as much opportunity as possible to explore a more integrated / shared services solution (the development of the community hub model).</p>	RED
18. Culture and Tourism		The impact on this SA objective will form part of a more detailed SA/SEA assessment later in the JCS process.	
19. Deliverability of Site and other strategic spatial options?			
19a Are there any known		The requirements for infrastructure are currently subject to initial appraisal by	

needs for essential infrastructure?		infrastructure providers.	
19b Will development of the site ensure greater self containment of the urban areas?	No	The distance of the site (almost four miles from the centre of Gloucester) means that its development is not expected to ensure a greater containment of the main urban centre of the city). There is a danger that development of this site would lead to even greater urban sprawl away from the centre of business activity within the Gloucester inner city urban area, there is a danger that Gloucester could end up with two business centres which would not be desirable.	RED
19c Is the site within the Green Belt (summarise findings of greenbelt review).	No	The site is not greenbelt however part of the area could be considered important in helping to prevent development sprawling into countryside areas that are poorly related to urban areas.	AMBER
<p>Conclusion:</p> <p>G7 Land South of Gloucester. Similar to the findings of the SA of G6. This site performs poorly against much of the sustainability criteria, particularly in relation to adverse impact on biodiversity value, accessibility to key services and facilities, and the need to ensure greater self containment of the main urban areas and protecting against urban sprawl. The site does not perform well in terms of sustainable transport, or connectivity with existing settlements. The site did perform well in relation to the economic objectives there are existing employment opportunities nearby and the site has good access to the motorway network, however current development is already causing pressure on the M5 Junction 12, large scale development at this broad location would exacerbate this situation.</p> <p>County Libraries info: Encourage early and open dialogue between potential infrastructure / service providers, particularly where alternative / shared services solution may be possible. From the library service perspective examples include:- better alignment with public transport to improve accessibility and the expansion of co-location opportunities (e.g. with youth services, children's centres, Police, GP and health care, district and / or town council services, and volunteer / 3rd sector activities etc...)</p> <p>If strategic-scale development growth is taken forward in this locality (several thousand units across G6 and G7) careful consideration will need to be given to a review of the form and status of the proposed local tiered libraries. This may also result in new (on-site) facilities and / or significant re-modelling of the existing provision.</p>			

JCS Sustainability Appraisal – Broad Locations

Site Reference No. G8 Land to the West of Gloucester at Highnam

Total Area of Site 608.16ha

SA Objective/Indicator	Notes and Commentary	Performance
Biodiversity		
1a Does the broad location contain sites of biodiversity value e.g. SSSI?	No	RED
1b Is the broad location within 5km of a European Designated Site (SAC or SPA)	No	GREEN
1c Are there designated BAP Priority Habitats on the site?	No	AMBER
1d Would development of the site be likely to lead to fragmentation of important habitats	Yes/No	
1e Will development of the site offer opportunities to link important habitats/create wildlife corridors?	Maybe	AMBER
Overall likely biodiversity impact?	Large site with pockets of biodiversity interest. Primarily Lassington Wood and Highnam Court. The rest of the site is fairly intensive arable fields with large fields and poor structure, there are a few plantation woodlands. The Leadon Valley is particularly species poor, though given its flood plain environment has the ability to be a significant habitat. On the assumption that Highnam Court and Lassington Wood are excluded then the site could potentially be developed without too much impact on biodiversity.	AMBER
2. Climate Change Mitigation	For the purposes of broad location SA this objective considers renewable energy potential only. Reduction of carbon emissions through location and transport are dealt with under SA Objective 8. Design of development to reduce carbon will form part of later detailed masterplanning stage of selected broad locations.	
2a Does the site have any renewable energy resource potential?	Yes/No	

<p>2b Is there large energy/heat demand potential from facilities/premises in the area that could benefit from excess heat from decentralized energy e.g. hospital/leisure centre/large manufacturer?</p>	<p>Yes/No</p>							
<p>3. Climate change Adaptation</p>	<p>This objective is not assessed as part of the broad locations SA. Flooding is considered separately and other climate change adaptation techniques will be a fundamental part of the design of individual developments rather than site specific.</p>							
<p>4. Flooding Does the broad location contain areas in Flood Zones 2, 3a or 3b? If so give approximate percentage of the site affected.</p>	<table border="1"> <tr> <td data-bbox="587 1482 719 1688"> <p>Flood zone 2</p> </td> <td data-bbox="719 1482 820 1688"> <p>Flood zone 3a</p> </td> <td data-bbox="719 1346 820 1482"> <p>Flood zone 3b</p> </td> </tr> <tr> <td data-bbox="587 1151 719 1482"> <p>Yes 2%</p> </td> <td data-bbox="719 1151 820 1482"> <p>Yes 1%</p> </td> <td data-bbox="719 958 820 1151"> <p>Yes 2%</p> </td> </tr> </table>	<p>Flood zone 2</p>	<p>Flood zone 3a</p>	<p>Flood zone 3b</p>	<p>Yes 2%</p>	<p>Yes 1%</p>	<p>Yes 2%</p>	<p>Floodzone is on the eastern and southeastern site boundary this could have implications for access to this broad location area. The rest of the area is unconstrained, however unless there is significant infrastructure put in place to allow access to and from the site in times of flooding the risk that any new settlement would be isolated is probably high.</p>
<p>Flood zone 2</p>	<p>Flood zone 3a</p>	<p>Flood zone 3b</p>						
<p>Yes 2%</p>	<p>Yes 1%</p>	<p>Yes 2%</p>						
<p>5 & 6 Natural Resources</p>								
<p>5a Is the site brownfield or Greenfield (if Greenfield state approximate percentage of total area)?</p>	<p>Greenfield 75 %</p>	<p>Predominantly Greenfield with the existing built settlement of Highnam</p>						
<p>5b Does the site contain any existing buildings which could be refurbished?</p>	<p>Yes/No No</p>							
<p>5c Does the site contain landscape designations e.g. AONB, local designation.</p>	<p>Yes/No</p>	<p>LAN3 - Landscape Protection Zone to east of area LND6 - Historic Park and Garden to south of Highnam TOR9 Protected line of Herefordshire/Gloucestershire Canal to east of site</p>						
<p>5d Overall judgement of landscape sensitivity</p>		<p>Further information required.</p>						

5e Does the site contain high grade agricultural land – Grades 1,2 and 3a (if give the approximate percentage)	Yes Grade 1 50%	No Grade 2 %	Yes Grade 3 50 %	This site contains approximately 50% grade 1 agricultural land, this is the best and most versatile land and development on such high grade land should be avoided unless there is no suitable alternative.	RED
5f Would development of the site help clean up contaminated land or eradicate invasive alien plants e.g. Japanese Knotweed?	Yes/No	There are some contaminations concerns to the south eastern tip of the site. To the north of the A40 the concerns relate to the presence of former railway lines and former hospital buildings and grounds (though now largely redeveloped for housing). To the south of the A40 these relate to the presence of railway lines and the tipping of unknown materials. The development of this site could have a positive impact in terms of remediating potentially contaminated land.			
6a Are there known mineral deposits? Are these viable and will they need to be extracted before development?	Yes/No				
6b Are there any water supply constraints?	Yes/No				
6c Are there any Sewerage Network/Capacity constraints	Yes/No				
Historic Environment					
7a Does the site contain areas of archaeological significance or historic value.	Yes/No	2 no. Schedule Ancient Monument's at Over Listed Buildings at Highnam Court and Gate Houses. Grade I listed church of Holy Innocents and many grade II listed buildings predominantly south west of the broad location. Small number of listed buildings to the north. Historically sensitive area which should be protected.			
7b Is the broad location within (or partly within) a Conservation Area	Yes/No	No			
8. Transport					
8a Is the broad location in, or close to, an area of high accessibility to key facilities	Yes/No	Located to the north west of Gloucester, beyond the River Severn. Local services exist at Highnam, though limited and small-scale. Remote from Gloucester and accessibility issues exist along the A40.			
		RED			

8b Is the site well connected to the transport infrastructure network, and will the location provide opportunities to support travel by non car modes.	Yes/No	Site located within close proximity to the A40, running along the southern boundary, though there are capacity issues in relation to access into Gloucester, particularly at peak times. Existing bus services run along the A40 and B4215. Development at this site would need to be informed by a comprehensive package of transport measures.	RED
8c Are there any Highway Junction capacity constraints?	Yes/No		
16. Waste and Pollution			
9a Is the site close to or within a reduced air quality area?	No		
9b Is the site close to an existing or planned waste processing facility?	Yes/No		
10. Economy 10a Is the broad location suitable for a mix of employment opportunities?	Yes/No	Site is well connected to A40 trunk road & may be suitable for a mix of employment opportunities	AMBER
10b Is the broad location close to a range of existing employment opportunities?	No	Closest opportunities located in Gloucester City Centre which requires travel	AMBER
18 City and Town Centres Does the site have the ability to create and sustain a vibrant community? Will it support the existing town and city centre facilities or will it help unlock identified needed facilities?	Support Existing Yes/No	Unlock new Yes/No This is a remote site separated from Gloucester by a wide floodplain apart from a slim wedge. Large scale development would be expected to overwhelm the small settlement of Highnam which does not have the facilities to support the existing settlement centre. However as it is remote from any other urban areas it would be most likely to support the Gloucester main urban area which is relatively close, although access to the main urban centre is currently poor.	AMBER
12. and 13. Sustainable	These objectives will be considered at a later stage in the SA/SEA process during the more detailed design and masterplanning stages.		

Communities		
14. Health		
14 Could development of the site improve access to local health facilities and improve health inequalities?	Yes/No	A&E and other hospital facilities to be found at Gloucester Royal Hospital GP's surgery at Lassington Lane, Highnam.
15. Housing		All the sites are likely to be able to deliver some identified housing need. The tenure split, ratio of affordable to open market, size and density of housing would form part of a more detailed assessment at a later stage in the SA/SEA process.
16. Green Space		
16a Does the location provide the opportunity for access to the countryside and natural environment?	Yes	Yes – site is located in open countryside and offers opportunities to access adjacent Green Infrastructure
16b Does the site contain strategic open green space?	Yes	Highnam Court is a protected House and Garden
16c Will it ensure existing open spaces are protected and enhanced?	Yes/No	MEZ
17. Education		
17 a Will the site allow good access to educational facilities or the ability to support existing facility or a new facility?	Yes/No	Secondary Schools All Gloucester Secondary Schools or Newent School <i>Site not in walking or reasonable cycling distance to any secondary schools</i> <u>Primary Schools</u> Highnam Primary School <i>Sites adjacent to existing settlements are in 20 minutes walking time of primary school</i>
18. Culture and Tourism		The impact on this SA objective will form part of a more detailed SA/SEA assessment later in the JCS process. Site includes protected route of Gloucestershire/Herefordshire Canal in Tewkesbury Borough

19. Deliverability of Site and other strategic spatial options?		
19a Are there any known needs for essential infrastructure?		The requirements for infrastructure are currently subject to initial appraisal by infrastructure providers.
19b Will development of the site ensure greater self containment of the urban areas?	Yes/No	
19c Is the site within the Green Belt (summarise findings of greenbelt review).	No	Green
<p>Conclusion:</p> <p>Only real settlement in this site is Highnam which has a primary school & nursery, GP surgery, church and community centre, however all other facilities have to be obtained elsewhere. Secondary school & food shopping require a bus or car journey. The site is therefore not as sustainable as others on the periphery of existing urban areas. Also large scale development in this area would overwhelm the existing small settlement of Highnam. It would not be appropriate to develop another freestanding new small settlement in the open countryside as this would be totally unsustainable.</p>		

JCS Sustainability Appraisal – Broad Locations

Site Reference No. G9 Land to the South of Churchdown

Total Area of Site 49.66 ha

SA Objective/Indicator	Notes and Commentary	Performance
Biodiversity		
1a Does the broad location contain sites of biodiversity value e.g. SSSI?	No	No identified sites GREEN
1b Is the broad location within 5km of a European Designated Site (SAC or SPA)	No	GREEN
1c Are there designated BAP Priority Habitats on the site?	No	GREEN
1d Would development of the site be likely to lead to fragmentation of important habitats	No	It is important to note that G9 is surrounded by urban development and contains a large area of important undeveloped green space. This greenspace is used as a sports site so is unlikely to have a high biodiversity value. There are no local identified sites of biodiversity importance. Most of the site is intensively managed currently arable agricultural land with a large field pattern and poor hedgerow structure. GREEN
1e Will development of the site offer opportunities to link important habitats/create wildlife corridors?	Yes/No	Possibly this would have to be investigated further as part of a more detailed SA/SEA process should the broad location continue to be considered as a possible development site at later stages within the JCS process. Biodiversity levels could be improved with development of this site provided making space for wildlife is incorporated within development briefs and masterplans. GREEN
Overall likely biodiversity impact?	High (Red), Medium (Amber), Low (Green) This site is biodiversity poor. It is isolated by development and road infrastructure with no connection to other habitat. It is intensively farmed, the only redeeming feature being the over mature hedgerow along the B4063 and possible the ditch line. Both could be readily incorporated into any development and with minor positive management would improve.	GREEN
2. Climate Change Mitigation	For the purposes of broad location SA this objective considers renewable energy potential only. Reduction of carbon emissions through location and transport are dealt with under SA Objective 8. Design of development to reduce carbon will form part of later detailed masterplanning stage of selected broad	Reduction of carbon emissions through location and transport are dealt with under SA Objective 8. Design of development to reduce carbon will form part of later detailed masterplanning stage of selected broad

	Locations.		
2a Does the site have any renewable energy resource potential?	Yes/No	This broad location lies within a constrained area for wind resource. There are no realistic opportunities for hydropower. High potential in terms of energy crop yield.	
2b Is there large energy/heat demand potential from facilities/premises in the area that could benefit from excess heat from decentralized energy e.g. hospital/leisure centre/large manufacturer?	Yes/No	Further information required.	
3. Climate change Adaptation	This objective is not assessed as part of the broad locations SA. Flooding is considered separately and other climate change adaptation techniques will be a fundamental part of the design of individual developments rather than site specific.		
4. Flooding Does the broad location contain areas in Flood Zones 2, 3a or 3b? If so give approximate percentage of the site affected.	Flood zone 2	Flood zone 3a	Flood zone 3b
	No	No	No
5 & 6 Natural Resources			
5a Is the site brownfield or Greenfield (if Greenfield state approximate percentage of total area)?	Greenfield 95 %	Current land use is predominantly agricultural with some sports/recreation to almost separate parcel of land to the north of the broad location. New development taking place on southern most parcel of land adjacent to A40 Golden Valley By-pass	
5b Does the site contain any existing buildings which could be refurbished?	No	No	
5c Does the site contain landscape designations e.g. AONB, local designation.	No	No	
			GREEN
			RED
			GREEN

<p>5d Overall judgement of landscape sensitivity</p>		<p>Site G9 – overall rating of sensitivity; medium to high This relatively smaller area still forms part of a vital piece of greenbelt dividing Innsnorth and Churchdown with the larger expanse of Gloucester city. There is a recreational sports field to the north which is of great local importance to the two neighbouring communities. However the prominent existing land use is agricultural fields with hedgerow boundaries and a small wooded coppice which is characteristic of the larger vale. It is has four main communication routes in and around it which connects the outer villages to the larger conurbation. These busy routes have views which are likely to be the key visual receptors of this area. Any development within this site will have the advantage of having the existing urban form encompassing the built form and therefore the scope of mitigation would be low. However, the value of this landscape does not lie within the actual historic or ecological values but with its vital function providing a green amenity and visual divide between the city and the two villages.</p>	<p>AMBER/RED</p>			
<p>5e Does the site contain high grade agricultural land – Grades 1,2 and 3a (if give the approximate percentage)</p>	<p>No Grade 1 %</p>	<table border="1"> <tr> <td data-bbox="683 1285 847 1525"> <p>No Grade 2 %</p> </td> <td data-bbox="683 1128 847 1285"> <p>Yes Grade 3 75 %</p> </td> <td data-bbox="683 546 847 1128"> <p>This broad location is 75% grade 3 agricultural, the rest of the site is green infrastructure used sports ground.</p> </td> </tr> </table>	<p>No Grade 2 %</p>	<p>Yes Grade 3 75 %</p>	<p>This broad location is 75% grade 3 agricultural, the rest of the site is green infrastructure used sports ground.</p>	<p>AMBER</p>
<p>No Grade 2 %</p>	<p>Yes Grade 3 75 %</p>	<p>This broad location is 75% grade 3 agricultural, the rest of the site is green infrastructure used sports ground.</p>				
<p>5f Would development of the site help clean up contaminated land or eradicate invasive alien plants e.g. Japanese Knotweed?</p>	<p>Yes/No</p>	<p>There are some concerns to the southern part of the site due to the presence of a sewage treatment works.</p>				
<p>6a Are there known mineral deposits? Are these viable and will they need to be extracted before development?</p>	<p>Yes/No</p>	<p>Further information required.</p>				
<p>6b Are there any water supply constraints?</p>	<p>Yes/No</p>	<p>Further information required.</p>				
<p>6c Are there any Sewerage Network/Capacity constraints</p>	<p>Yes/No</p>	<p>Further information required.</p>				

Historic Environment			
7a Does the site contain areas of archaeological significance or historic value.	No	No	GREEN
7b Is the broad location within (or partly within) a Conservation Area	No	No	GREEN
8. Transport			
8a Is the broad location in, or close to, an area of high accessibility to key facilities	Yes	Located to the north east of Gloucester, beyond the A40. Well related to Churchdown offering some key services, and the wider Gloucester urban area.	GREEN
8b Is the site well connected to the transport infrastructure network, and will the location provide opportunities to support travel by non car modes.	Yes	Site located adjacent to A40 and the Old Cheltenham Road dissects the site east to west. Existing high frequency bus services currently run through the site between Gloucester and Cheltenham. Well related to the main urban area of Gloucester for access to the City Centre for a wider range of shops, services and facilities. Sufficient scale of investment (including providing of a safe green infrastructure network linked into current pedestrian and cycleways) could help encourage a greater modal shift away from use of the private car. Further information required.	GREEN
8c Are there any Highway Junction capacity constraints?	Yes/No		
9. Waste and Pollution			
9a Is the site close to or within a reduced air quality area?	Yes	Monitoring is continuing in terms of air quality within close proximity of G9.	
9b Is the site close to an existing or planned waste processing facility?	No	No	GREEN
10. Economy			
10a Is the broad location suitable for a mix of employment opportunities?	Yes	The site could be suitable for a mix of employment opportunities if the correct infrastructure were provided from Elmbridge Court roundabout to accommodate HGVs	GREEN

10b Is the broad location close to a range of existing employment opportunities?	Yes/No	The site is close to the urban city centre which offers a range of employment opportunities as well as close to IMJON Barracks and the employment areas at Staverton and Staverton airport.	GREEN
19 City and Town Centres Does the site have the ability to create and sustain a vibrant community? Will it support the existing town and city centre facilities or will it help unlock identified needed facilities?	Support Existing Yes/No	Unlock new Yes/No Further information required.	
12. and 13. Sustainable Communities		These objectives will be considered at a later stage in the SA/SEA process during the more detailed design and masterplanning stages.	
14. Health			
14 Could development of the site improve access to local health facilities and improve health inequalities?	Yes/No	GP & dental services available in Churchdown A&E and other hospital requirements provided for at Gloucester Royal Hospital in the City Centre.	AMBER
15. Housing		All the sites are likely to be able to deliver some identified housing need. The tenure split, ratio of affordable to open market, size and density of housing would form part of a more detailed assessment at a later stage in the SA/SEA process.	
16. Green Space			
16a Does the location provide the opportunity for access to the countryside and natural environment?	Yes/No	Further information required.	
16b Does the site contain strategic open green space?	Yes	Important Public Open Space to the north of the site. The northernmost area of land in this broad location is currently used as a sports ground. It is considered to be locally significant and is designated as an important open space within the Tewkesbury Local Plan. This northern most part G9 could however be taken out of the broad location area and	RED

			retained as strategic greenspace. Therefore this is not necessarily a constraint towards some development on the rest of the location.	
16c Will it ensure existing open spaces are protected and enhanced?	Yes		Existing open space should be protected.	GREEN
17. Education				
17 a Will the site allow good access to educational facilities or the ability to support existing facility or a new facility?	Yes/No		<p><u>Secondary Schools</u> Churchdown School is in 20 minutes walking distance of site</p> <p><u>Primary Schools</u> Catholic Primary School in Churchdown lies adjacent to western boundary of site & is walkable Parton Manor School is walkable within 20 minutes Innsworth Primary is walkable within 20 minutes Longlevens Infants and Juniors in walking distance too</p> <p>Higher education available at Gloucester and Cheltenham campuses of Gloucestershire College using no. 94 bus.</p>	GREEN
18. Culture and Tourism			The impact on this SA objective will form part of a more detailed SA/SEA assessment later in the JCS process.	
19. Deliverability of Site and other strategic spatial options?				
19a Are there any known needs for essential infrastructure?			The requirements for infrastructure are currently subject to initial appraisal by infrastructure providers.	
19b Will development of the site ensure greater self containment of the urban areas?			Site G9 is surrounded on all sides by development and this site is close to the urban centre of Gloucester. Its development is likely to lead to a greater self-containment of the urban area. There is a danger however that development of the site could lead to the agglomeration of Innsworth and Churchdown with Gloucester, this can be mitigated through careful masterplanning to help retain a green infrastructure network, and the provision of some green public space along the northern border of this broad location in order to help retain some separation between the two settlements to mitigate any adverse impact and to help retain a sense of place and community identity.	GREEN/AMBER
19c Is the site within the Green Belt (summarise findings of greenbelt review).	Yes		The whole of this broad location site is currently within the designated Greenbelt. A recent report by Entec concluded that this broad location plays a significant role in preventing westward sprawl from Churchdown, contributes in safeguarding the countryside from encroachment but only	RED/AMBER

		<p>has a limited contribution in helping to preserve the setting and special character of historic towns. This broad location was given an average rating in the earlier Strategic Green Belt review in 2006.</p>	
<p>Conclusion:</p> <p>Site G9 Land north of Gloucester performed extremely well against most of the sustainability objectives. The site is surrounded by urban development and this site is closest to the urban centre of Gloucester. Its development is likely to lead to greater self-containment of the urban area. There is a danger that development of the site could lead to the agglomeration of Innsworth and Churchdown with Gloucester, although this can be mitigated through careful masterplanning to provide green public space along the northern border of this broad location to help retain some separation between the settlements. The site is considered to be of low biodiversity value, but it does contain an important green space which is allocated in the Tewkesbury Local Plan. The site is currently within the greenbelt designation, its landscape sensitivity is considered to be medium to high although the value of the landscape lies with its vital function of providing a green amenity and visual divide between the city and the two villages, rather than a visual divide between the two major urban areas. If the site could be developed without encroaching on the designated important greenspace and masterplanned to retain some green and visual divide between the settlements, it may be one of the most sustainable peripheral broad locations</p>			

Site Reference No. C1 Land to the West and North of Bishops Cleeve Total Area of Site 344.53

SA Objective/Indicator	Notes and Commentary	Performance
2. Biodiversity		
1a Does the broad location contain sites of biodiversity value e.g. SSSI?	No	GREEN
1b Is the broad location within 5km of a European Designated Site (SAC or SPA)	No	GREEN
1c Are there designated BAP Priority Habitats on the site?	No	GREEN
1d Would development of the site be likely to lead to fragmentation of important habitats	No	GREEN
1e Will development of the site offer opportunities to link important habitats/create wildlife corridors?	Yes/No Good connectivity to like habitat especially to the east of the site.	GREEN
Overall likely biodiversity impact?	Intensively managed agricultural landscape, dominated by arable cultivation. Large fields with very poor hedgerow structure and limited mature trees. Small amount of pasture and plantation woodland. No informal or statutory designations. Only feature is a brook that runs East to West through the centre of the site. Generally a poor site in biodiversity terms.	GREEN
2. Climate Change Mitigation	For the purposes of broad location SA this objective considers renewable energy potential only. Reduction of carbon emissions through location and transport are dealt with under SA Objective 8. Design of development to reduce carbon will form part of a later detailed masterplanning stage of selected broad locations.	
2a Does the site have any renewable energy resource potential?	Yes/No Some wind potential, limited to no hydropower potential. High energy crop potential.	
2b Is there large energy/heat demand potential from facilities/premises in the	Yes/No	

<p>area that could benefit from excess heat from decentralized energy e.g. hospital/leisure centre/large manufacturer?</p>			
<p>3. Climate change Adaptation</p>	<p>This objective is not assessed as part of the broad locations SA. Flooding is considered separately and other climate change adaptation techniques will be a fundamental part of the design of individual developments rather than site specific.</p>		
<p>4. Flooding Does the broad location contain areas in Flood Zones 2, 3a or 3b? If so give approximate percentage of the site affected.</p>	<p>Flood zone 2 Yes 5%</p>	<p>Flood zone 3a</p>	<p>Flood zone 3b Yes 5%</p> <p>Dean Brook traverses the site west to east from the sites Western Boundary until the point where the A435 traverses the site. TBLP considers the Dean Brook a High Risk Flood Area, under Policy EVT5. SFRA Level 1 further identifies this course as flood zone 2 and flood zone3b. Provided any development is directed away from the high flood risk area, flood risk is not expected to be a significant constraint.</p>
<p>5 & 6 Natural Resources</p>			
<p>5a Is the site brownfield or Greenfield (if Greenfield state approximate percentage of total area)?</p>	<p>Greenfield 95 %</p>		
<p>5b Does the site contain any existing buildings which could be refurbished?</p>	<p>No</p> <p>Some farms with agricultural buildings however no significant resource for conversion/regeneration.</p>		
<p>5c Does the site contain landscape designations e.g. AONB, local designation.</p>	<p>Yes</p> <p>That part of the site to the east of the railway line and to west of AONB at Woodmancote is identified as Special Landscape Area. (TBLP LND2). Land to south and east of Gotherington residential development boundary is also Special Landscape Area (TBLP LND2).</p> <p>Rest of site does not have any landscape designations.</p>		
<p>5d Overall judgement of landscape sensitivity</p>	<p>Settled unwooded vale. East - Proximity to scarp slope and Nottingham Hill provides impressive backdrop. Harsh urban edge to Bishops Cleeve. West – Fairly ordinary vale landscape – largely very rural character. This broad location is part of the open countryside extending northwards to Gotherington and north-westwards towards Tewkesbury and forms the countryside fringe of Bishops Cleeve. Existing land use is mainly grazing/arable, and the landscape is open and extensive with distant views to the west, north and east.</p>		

<p>5e Does the site contain high grade agricultural land – Grades 1,2 and 3a (if give the approximate percentage)</p>	<p>No Grade 1 %</p>	<p>Yes Grade 2 5 %</p>	<p>Yes Grade 3 90 %</p>	<p>Current land use is predominantly agricultural with some caravan sites and allotments. Agricultural land is predominantly Grade 3 with a small proportion of Grade 2 along the most northern border.</p>	<p>AMBER</p>
<p>5f Would development of the site help clean up contaminated land or eradicate invasive alien plants e.g. Japanese Knotweed?</p>	<p>Yes/No</p>	<p>Potential contamination concerns resulting from the presence of a scrap yard to the centre of the site.</p>			
<p>6a Are there known mineral deposits? Are these viable and will they need to be extracted before development?</p>	<p>Yes</p>	<p>YES - There are some sand & gravel deposits in the north of the site (<i>just south of Gotherington</i>) and in the south of the site (<i>just north of Bishop's Cleeve</i>).</p>			
<p>6b Are there any water supply constraints?</p>	<p>Yes</p>	<p>SIDP: local reinforcement may be required</p>			
<p>6c Are there any Sewerage Network/Capacity constraints</p>	<p>Yes/No</p>	<p>Further information required.</p>			
<p>10 Historic Environment</p>					
<p>7a Does the site contain areas of archaeological significance or historic value.</p>	<p>Yes/No</p>	<p>Number of listed buildings which form a linear form throughout the village of Gotherington which is to the North of the Broad Location. Local distinctiveness should be addressed.</p>			
<p>7b Is the broad location within (or partly within) a Conservation Area</p>	<p>Yes/No</p>	<p>No</p>			
<p>8. Transport</p>					
<p>8a Is the broad location in, or close to, an area of high accessibility to key facilities</p>	<p>No</p>	<p>Located to the north of Bishops Cleeve with limited access to key services. Site location is remote from Cheltenham and access to a wide range of key services.</p>			<p>RED</p>

<p>8b Is the site well connected to the transport infrastructure network, and will the location provide opportunities to support travel by non car modes.</p>	<p>No</p>	<p>Site currently accessed by the A435 (Greenacre Way). Site also dissected by Gotherington Lane. Bus Services run along the A435, limited bus links to Ashchurch and remote from Cheltenham. Limited opportunity to support travel by non-car modes given the site's location to the north of Bishops Cleeve. Poor access to rail network</p>	<p>RED</p>
<p>8c Are there any Highway Junction capacity constraints?</p>	<p>Yes</p>	<p>Problems: A435 corridor to Cheltenham is already congested at peak periods, with little scope for significant improvement due to constraints of neighbouring development. Racecourse Park and Ride is already beyond the extent of congestion on this corridor, making it less attractive to use. A435 through Bishop's Cleeve creates a barrier to movement between the western part of C1 and the local services provided within Bishop's Cleeve itself. Major investment would be required in the A435 corridor to support additional housing over and above that already in the planning system. Such investment would require large scale housing allocations in order to be viable. Possible Solutions/opportunities: Potential to link with committed development that already has the benefit of planning approval. Transport strategy already agreed for Phase One of Homelands Development. Discussions on transport strategy required for Homelands Phase 2 and for the adjoining Cleevelands development proposal are well advanced ahead of a public inquiry into both these sites scheduled for September.</p>	
<p>17. Waste and Pollution</p>			
<p>9a Is the site close to or within a reduced air quality area?</p>	<p>No</p>	<p>No Air Quality Management Areas within broad location or Sewage Treatment Works Odour Zones.</p>	<p>GREEN</p>
<p>9b Is the site close to an existing or planned waste processing facility?</p>	<p>Yes</p>	<p>The south western boundary of this broad location is within close proximity to the WCS strategic site at Wingmoor Farm.</p>	<p>AMBER</p>
<p>10. Economy 10a Is the broad location suitable for a mix of</p>	<p>Yes/No</p>	<p>Broad location C1 contains two large greenfield sites considered as having limited potential to accommodate employment land. Site lies to the north of Bishops Cleeve which could raise access issues for vehicles, especially</p>	<p>AMBER</p>

<p>employment opportunities? 10b Is the broad location close to a range of existing employment opportunities?</p>	<p>Yes/No</p>	<p>HGVs. There are some employment opportunities in and around Bishops Cleeve; two large employers GEC aerospace and Zurich Financial Services, however these are located to the far south of Bishops Cleeve, and are not well connected to the broad location area, there is a small industrial estate (Malvern View Business Park) close to the south west border of this broad location area, a small extension for additional industrial use has been allocated in the Tewkesbury Local Plan but has not yet been developed out. Any additional large scale new housing development would be expected to increase levels of commuting into the main city and towns of Gloucester, Cheltenham and Tewkesbury, although this could be mitigated to some extent if large employers were attracted to the broad location area through employment land allocations.</p>	<p>AMBER/RED</p>
<p>20 City and Town Centres Does the site have the ability to create and sustain a vibrant community? Will it support the existing town and city centre facilities or will it help unlock identified needed facilities?</p>	<p>Support Existing Yes/No</p>	<p>Unlock new Yes/No Development at this site, particularly large scale housing development would be expected to increase the problem of the urban sprawl of Bishops Cleeve northwards and away from Cheltenham town centre. Development would therefore be expected to reduce the ability to create and sustain a vibrant community. Bishops Cleeve has seen tremendous residential growth in recent years. Services and facilities within this settlement are limited, any additional development to put stress on current services in the village.</p>	<p>RED</p>
<p>12. and 13. Sustainable Communities</p>	<p>These objectives will be considered at a later stage in the SA/SEA process during the more detailed design and masterplanning stages.</p>		
<p>14. Health 14 Could development of the site improve access to local health facilities and improve health inequalities?</p>	<p>Yes/No</p>	<p>Church Road GP and dental surgeries and Stoke Road GP surgery both in central locations in the village however while some of site will be in a 20 minute walk of these surgeries a majority of it will not. Further work required to ascertain 20 minute walking contours and to define intersection of health facilities/ schools/ local centre walking catchments to identify most sustainable parts of this large broad location. Closest A&E at Cheltenham General Hospital some 8km to the south. New development may result in additional health care facilities however</p>	<p>RED/AMBER</p>

		existing facilities are all centrally located.	
15. Housing		All the sites are likely to be able to deliver some identified housing need. The tenure split, ratio of affordable to open market, size and density of housing would form part of a more detailed assessment at a later stage in the SA/SEA process.	
16. Green Space			
16a Does the location provide the opportunity for access to the countryside and natural environment?	Yes/No		
16b Does the site contain strategic open green space?	Yes/No	Potential of brook for green infrastructure asset. There are existing allotments off the A435 north west of Greenacre Way, these would need to be conserved, and there could be opportunities to provide additional allotments.	
16c Will it ensure existing open spaces are protected and enhanced?	Yes/No		
17. Education			
17 a Will the site allow good access to educational facilities or the ability to support existing facility or a new facility?	Yes/No	Area to east of railway and adjacent to AONB is within 20 minute walk of Woodmancote Primary School and land to r/o Millham Road would be within 20 minute walk of Woodmancote and Bishops Cleeve Primary. Land adjacent to Evesham Road and Deans Farm also within 20 minute walk of Bishops Cleeve Primary School. Tewkesbury Secondary School (11-18) may be within 20 minutes walk of that part of the site to the east of the railway adjacent to the AONB. Rest of site is situated further away and unlikely to be within 20 minute walking distance of Cleeve Secondary School which is located in Two Hedges Road. Further work required to ascertain how much of site is within 20 minute walk of primary schools and local centre. Further education facilities in Cheltenham at Gloucestershire College in Hesters Way, no direct bus route. Info from County: If developed along with C2 consideration will need to be	RED/AMBER

		<p>given to the cumulative impact upon the existing early year's / primary network. Particularly, when reviewing on-site or off-site options and / or when taking into account 'existing capacity' with the modelling (size and scale) of any new on-site provision.</p> <p>Similarly, the cumulative impact upon the existing secondary network (if developed alongside C2 and / or C3) will be an important issue as off-site provision is the most likely solution in this instance.</p> <p>Early advice on the requirements of other infrastructure services would be welcomed so as to give as much opportunity as possible to explore a more integrated / shared services solution (the development of the community hub model).</p>	
18. Culture and Tourism	The impact on this SA objective will form part of a more detailed SA/SEA assessment later in the JCS process.		in the JCS
19. Deliverability of Site and other strategic spatial options?			
19a Are there any known needs for essential infrastructure?		The requirements for infrastructure are currently subject to initial appraisal by infrastructure providers.	
19b Will development of the site ensure greater self containment of the urban areas?	Yes/No	No C1 is on the northern boundary of the already highly developed settlement of Bishops Cleeve. This settlement has undergone rapid expansion in recent years. This land forms the countryside fringe of Bishops Cleeve to the north.	RED
19c Is the site within the Green Belt (summarise findings of greenbelt review).	No	No, however C1 does have a high importance in terms of preventing urban sprawl of Bishops Cleeve northwards into the surrounding countryside. The recent greenbelt review considered whether land to the north of Bishops Cleeve stretching in an arc from Stoke Road in the east to the Honeybourne should be considered for inclusion. The review found there was no clear case for its inclusion because the land performs only a limited greenbelt role; it was not found to have a direct role in preserving the setting of towns or preventing the merging of settlements. However, it was considered that it could help check unrestricted sprawl northwards into the open countryside, preventing the urbanisation of very rural land. The review concluded that this could be addressed by other planning policies.	AMBER
Conclusion:			

This broad location area is considered to be poor in terms of biodiversity value so performed well against biodiversity objectives compared to some of the other broad location sites. However it scored extremely poorly on most of the other sustainability objectives used within this first stage broad brush assessment. In particular, this location is not peripheral to Cheltenham and its distance from the main urban area is likely to increase the necessity to use the private car to access jobs and services.

Development at this site (which forms the countryside fringe of Bishops Cleeve to the north), particularly large scale housing development, would be expected to increase the problem of the urban sprawl of Bishops Cleeve northwards and away from Cheltenham town centre, and is therefore not expected to increase levels of self containment and ensure the continued vitality and vibrancy of the main urban centres. Bishops Cleeve has seen tremendous residential growth in recent years. Services and facilities within this settlement are limited, any additional development is likely to put additional stress on current services in the village. For these reasons it is felt that parts of the other broad location areas are likely to perform much better against the sustainability objectives and would be more suitable to undergo more detailed assessment. It is recommended that this broad location area be removed from the JCS broad location search.

County info regarding libraries: If strategic-scale development growth is taken forward in this locality (several thousand units across C1 and / or C2 and / or C3) careful consideration will need to be given to a review of the form and status of the proposed local tiered libraries. This may also result in new (on-site) facilities and / or significant re-modelling of the existing provision.

JCS Sustainability Appraisal – Broad Locations

Site Reference No. C2 Land to the South of Cheltenham

Total Area of Site 904.59

Note: because of the complexity of this site, for ease of understanding the different constraints and opportunities within the broad location it has been split into sections C2a to C2e

SA Objective/Indicator	Notes and Commentary	Performance
Biodiversity		
1a Does the broad location contain sites of biodiversity value e.g. SSSI?	No Cleeve Hill SSSI noted to be in favourable condition and unfavourable condition recovering is located approximately 1km east from the Eastern boundary of this broad location site (C2a)	C2a AMBER
1b Is the broad location within 5km of a European Designated Site (SAC or SPA)	No Key Wildlife Site close to outskirts of Bishops Cleeve (Nr Wingmore Farm) in subsection C2e.	C2e RED GREEN
1c Are there designated BAP Priority Habitats on the site?	Yes A small area of lowland meadow BAP is situated to the centre of the site, this is the Key Wildlife Site Nr Wingmore Farm in subsection C2e. Cleeve common to the eastern edge of the site. Lowland calcareous grassland, wet woodland and lowland meadows to the east of the site at Cleeve common.	C2a AMBER C2e RED
1d Would development of the site be likely to lead to fragmentation of important habitats	Yes/No C2a yes, there is good connectivity to like habitat especially to the east and the AONB which has very good habitat value. C2c Connectivity generally poor apart from the north. C2d Connectivity to like habitats is good although slightly constrained by the A435 and Smiths to the East and the railway to the West. C2e relatively good to like habitats with exception of land to the west of this area adjacent to Bishops Cleeve urban area.	C2a RED C2c GREEN C2d RED/AMBER C2e AMBER
1e Will development of the site offer opportunities to link important habitats/create wildlife corridors?	Yes/No There is potential for a small wildlife corridor to the south of the racecourse (C2a), this wildlife corridor (where assessed) has a high biodiversity value.	
Overall likely biodiversity impact?	C2a land between GWR and AONB – small field pattern with mixed arable and pasture. Some semi-improved and rough abandoned pasture plus some horticulture. Good hedgerow structure and many hedge trees. A large number of parkland trees many	C2a RED

	<p>veteran oaks. South of Woodmancote there are a number of broadleaved woodland trees of varying quality. There is useful habitat along the brookline that runs south of the site.</p> <p>C2b land between GWR and A435. Land dominated by amenity playing fields and horticulture. Generally poor biodiversity potential. Some good hedgerow and hedge trees and better habitat along the brook.</p> <p>C2c land to the West of the Race Course. Predominantly arable, large field structure with poor hedgerow structure. Small mixed woodland to the centre of the site and some old paddocks and limited remnant orchard along the urban fringe.</p> <p>C2d land between mainline railway and A435. Predominantly arable with some pasture, fields separated by hedges with generally poor structure. Better habitats around gardens and smallholdings around small settlements and along brook lines, where there is some good tree structure and some riparian habitat.</p> <p>C2e Land to the West of Bishops Cleeve. Low lying flat landscape with exception of landfill site that dominates north west quadrant of site Good future potential for biodiversity on the landfill site post completion. Land to the immediate south and east of better value with small key wildlife site of semi improved grassland and remnant orchard. Other features of interest include what appears to be an old duck decoy in the centre of the arable area. Tree lined brook defining the southern boundary and odd atypical habitats associated with landfill site. There is also the useful linear feature of railway embankment.</p>	<p>C2b GREEN/AMBER</p> <p>C2c GREEN</p> <p>C2d GREEN/AMBER</p> <p>C2e RED</p>
<p>2. Climate Change Mitigation</p>		
<p>For the purposes of broad location SA this objective considers renewable energy potential only. Reduction of carbon emissions through location and transport are dealt with under SA Objective 8. Design of development to reduce carbon will form part of later detailed masterplanning stage of selected broad locations.</p>		
<p>2a Does the site have any renewable energy resource potential?</p>	<p>Yes/No</p>	<p>Limited/no wind potential. Low hydropower potential adjacent. High energy crop potential.</p>
<p>2b Is there large energy/heat demand potential from facilities/premises in the area that could benefit from excess heat from decentralized energy e.g. hospital/leisure centre/large manufacturer?</p>	<p>Yes/No</p>	<p>This will be assessed at a later stage in the SA/SEA process</p>
<p>3. Climate change</p> <p>This objective is not assessed as part of the broad locations SA. Flooding is considered separately and</p>		

Adaptation	other climate change adaptation techniques will be a fundamental part of the design of individual developments rather than site specific.		
<p>4. Flooding Does the broad location contain areas in Flood Zones 2, 3a or 3b? If so give approximate percentage of the site affected.</p>	<p>Flood zone 2</p> <p>Yes 5%</p>	<p>Flood zone 3a</p>	<p>Flood zone 3b</p> <p>Yes 5%</p> <p>C2a Main river centreline runs south towards Cheltenham racecourse with flood zones 2 and 3b predominantly to the east of the centreline. C2b Floodplain runs through the Southern section of the sub-area, provided the sequential test is adhered to, flood risk will not be a constraint. C2c A small piece of flood zone runs across the most northern-most point – flood risk will not be a constraint for development. C2d The flood zone cuts this area in two from west to east through the middle of this sub-area. The northern boundary is also flood zone. C2e The flood zone forms the southern boundary of this sub area, however flood is not considered to be a constraint for this sub-area.</p>
5 & 6 Natural Resources			
5a Is the site brownfield or Greenfield (if Greenfield state approximate percentage of total area)?	Greenfield 70 %	Predominantly agricultural greenfield although settlement of Southam lies to east of C2a & built development of the racecourse lies in C2c.	
5b Does the site contain any existing buildings which could be refurbished?	No	CEG employment site lies to east of C2d, this is all brownfield and in use. Agricultural buildings which could be converted.	
5c Does the site contain landscape designations e.g. AONB, local designation.	Yes	C2a is within the designated Special Landscape Area and lies adjacent to the AONB	C2a RED Rest of C2 is GREEN

<p>5d Overall judgement of landscape sensitivity</p>	<p>Site C2a – overall rating of sensitivity; high This large area forms part of an important strategic landscape boundary/greenbelt dividing Bishops Cleeve to the north and Cheltenham to the south. The landform rises to the east to the foot of the Cotswold escarpment which dominates the views out of the site. A small village of Southam with an historic core is centred within this area, with the remaining surrounding countryside being predominately a patchwork of arable farmland with distinctive hedgerows and small wooded areas. Elevated views from the AONB along the east boundary highlight the landscapes' specific character and quality which reflect the protected landscape. Due to the openness of the area, scope for mitigation for any development would be difficult without detrimental effects on its overall character and value.</p> <p>Site C2b – overall rating of sensitivity; moderate to high This area immediately south of Bishops Cleeve is generally low lying flat agricultural land with a railway line running along the east boundary and the A435 to the west with industrial units beyond. Despite this defined boundary the area still remains semi-rural enclosing a farm at the heart and well used sport pitches. The large open field pattern with hedgerows influences the character of this part of the Gloucester Vale with the distant views of the AONB. It is still a vital part of the greenbelt and important strategic landscape buffer between the two large conurbations especially viewed from the adjacent protected and elevated countryside, however, the change in land use arising from a particular development could be considered in part due to the existing built form to the west of the main road.</p> <p>Site C2c – overall rating of sensitivity; moderate Again the overall land use for this area is agricultural however the land form is influenced by a slight rise to the south east creating views across the site. There is no existing built form within this area but it does border the northern part of Cheltenham to the south. Generally the landscape value is of low amenity, historic or ecological value but it has some public rights of ways across the site which has clear distant views of the Malvern Hills to the west and in part the Cotswolds to the east. Due to its semi - exposed location and rural character, it forms a key part of the greenbelt and therefore if developed, the detrimental effects on its character would be moderate.</p>	<p>C2a Red</p> <p>C2b Red/Amber</p> <p>C2c Amber</p>
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		<p>Site C2d – overall rating of sensitivity; moderate to high The field pattern of this rural landscape varies from medium to large in scale and is predominately regular in shape. It consists of mainly agricultural fields with a sewage works and industrial units to the north. A small brook running from east to west divides the area whilst creating a natural screening viewed from within the site. This is a dominant feature from within the site. Various footpaths lead the eye to the distant views across the vale which creates a sense of openness; however the landscape is generally of low amenity with little ecological value. However its location viewed from the AONB makes it fairly prominent and a key part of the green division between Bishops Cleeve and Cheltenham. Therefore the area is unlikely to be able to accommodate change arising from development not because of the landscape value but more from the visual value seen from the elevated AONB.</p> <p>C2e Further information required.</p>	C2d Red/Amber			
<p>5e Does the site contain high grade agricultural land – Grades 1,2 and 3a (if give the approximate percentage)</p>	<p>No Grade 1 %</p>	<table border="1"> <tr> <td data-bbox="842 1290 1011 1525"> <p>Yes Grade 2 5 %</p> </td> <td data-bbox="842 1133 1011 1290"> <p>Yes Grade 3 90 %</p> </td> <td data-bbox="842 546 1011 1133"> <p>Predominantly Grade 3 with a small portion of Grade 2 along the most northern border.</p> </td> </tr> </table>	<p>Yes Grade 2 5 %</p>	<p>Yes Grade 3 90 %</p>	<p>Predominantly Grade 3 with a small portion of Grade 2 along the most northern border.</p>	
<p>Yes Grade 2 5 %</p>	<p>Yes Grade 3 90 %</p>	<p>Predominantly Grade 3 with a small portion of Grade 2 along the most northern border.</p>				
<p>5f Would development of the site help clean up contaminated land or eradicate invasive alien plants e.g. Japanese Knotweed?</p>	<p>Yes/No</p>	<p>Further information required.</p>				
<p>6a Are there known mineral deposits? Are these viable and will they need to be extracted before development?</p>	<p>Yes</p>	<p>This area contains known and viable sand and gravel deposits (and engineering clays). Deposits have been proven economically viable and have been extensively worked west of Bishop's Cleeve up to the Ashchurch railway line. There are also additional sand and gravel deposits to the west and south of Southam, extending beyond the Toddington railway line to the approximate area currently occupied by GE Aviation. Further sand and gravel resources lie to the south of the racecourse around the</p>	<p>RED</p>			

			UCAS/University area and to the west of the racecourse around Hunting Butts.	
6b Are there any water supply constraints?	Yes/No		Further information required.	NOT ASSESSED
6c Are there any Sewerage Network/Capacity constraints	Yes/No		Further information required.	NOT ASSESSED
Historic Environment				
7a Does the site contain areas of archaeological significance or historic value.	Yes/No		Further information required. Cluster of listed buildings throughout Southam, predominantly on Southam Lane to the west of the B4632. Small number of listed buildings towards the west of the site at Brockhampton.	
7b Is the broad location within (or partly within) a Conservation Area	Yes/No		No	
8. Transport				
8a Is the broad location in, or close to, an area of high accessibility to key facilities	Yes/No		Further information required.	
8b Is the site well connected to the transport infrastructure network, and will the location provide opportunities to support travel by non car modes.	Yes/No		Public transport corridor runs through Bishops Cleeve to Cheltenham (on the road that forms border between C2 b and C2c/d). Main route from Cheltenham to Winchcombe and beyond runs along eastern boundary of C2a over Cotswold Scarp slope. Route of Gloucestershire and Warwickshire railway runs through C2c and between boundaries of C2b and C2a providing opportunities to promote a cycle route from Bishops Cleeve to Cheltenham.	
8c Are there any Highway Junction capacity constraints?	Yes		<u>Problems:</u> <ul style="list-style-type: none"> A435 corridor to Cheltenham is already congested at peak periods with little scope for significant improvement due to constraints of neighbouring development. 	

		<ul style="list-style-type: none"> ▪ Racecourse Park and Ride is already beyond the extent of congestion on this corridor, making it less attractive to use. ▪ Area of C2 East of GWSR Line constrained by limited highway network and poor junction layout within Prestbury. ▪ Poor access to rail network – remote from Cheltenham ▪ Major investment would be required in the A435 corridor to support additional investment over and above that already in the planning system. Such investment would require large scale housing allocations to be viable. <p><u>Possible Solutions/Opportunities:</u></p> <ul style="list-style-type: none"> ▪ Possible to link employment sites and strengthen bus services connecting Bishops Cleeve with Cheltenham. ▪ Potential opportunities to create sustainable transport corridor (walk, cycle and potentially bus) along the Honeybourne Line from Hunting Butts to Lower High Street and Cheltenham Station. 	
18. Waste and Pollution			
9a Is the site close to or within a reduced air quality area?	Yes	The western part of the site (near Brockhampton part of C2d) is allocated under Tewkesbury Borough Local Plan as development near sewage treatment works. Because of naturally occurring smells from sewage treatment, the policy advises that a zone should be kept free of development around specific sewage works, where the effluent treated is equivalent to that of a population greater than 2000.	
9b Is the site close to an existing or planned waste processing facility?	Yes/No	Yes, North West of the area (C2e) is a landfill site known as 'Wingmoor Farm East' operated by Grundons Waste Management (it accepts both hazardous and non-hazardous waste) A large part of the landfill area was allocated within the Waste Local Plan as a strategic waste site. A much smaller part of the landfill site is being taken forward into the Waste Core Strategy. An application is currently under consideration by GCC to extend the time limit of operations; including landfilling, materials recovery facility, landfill gas engines, sand and gravel extraction and leachate treatment.	
10. Economy			
10a Is the broad location suitable for a mix of employment opportunities?	Yes/No	Site lies to the north of Cheltenham and is not easily accessible from Junction 11 or Junction 10 of the M5 motorway for HGVs.	AMBER
10b Is the broad location close to a range of existing	Yes/No	Area may be suitable for B1 type uses. Site lies adjacent to northern suburbs of Cheltenham and to Cheltenham Racecourse and a range of employment opportunities within Cheltenham	GREEN

<p>employment opportunities?</p>		<p>could be easily reached by sustainable modes of transport.</p> <p>CEG (formerly Smiths Industries) aerospace high tech manufacturing located at Bishops Cleeve & Zurich Financial Services located at Bishops Cleeve.</p>	
<p>21 City and Town Centres Does the site have the ability to create and sustain a vibrant community? Will it support the existing town and city centre facilities or will it help unlock identified needed facilities?</p>	<p>Support Existing Yes/No</p>	<p>C2e is remote from the main settlement of Cheltenham, its development is therefore not expected to support the existing town centre. Its development could perhaps unlock identified needed facilities in nearby Bishop's Cleeve, but would be more likely to contribute towards continued sprawl and increased commuting to the main town centres.</p> <p>C2d –The southern part of this sub-area is reasonably close to central Cheltenham, development in this area is therefore likely to support the existing town facilities and help create and sustain a vibrant community which will not need to travel far to access services, jobs and facilities.</p> <p>C2c is the most peripheral sub-area within broad location C2 development within this sub area is therefore expected to have positive impact on the objective to create and sustain a vibrant community which supports the existing town and city centre facilities.</p> <p>C2b Most of this site is closer to Bishops Cleeve than Cheltenham, therefore it is mainly remote from the main settlement of Cheltenham, development is therefore not expected to support the existing town centre. Its development could perhaps unlock identified needed facilities in Bishop's Cleeve, but would be more likely to contribute towards the continued sprawl of this settlement and increased commuting to the main town centres. The southernmost part of this sub-area is better connected to Cheltenham and is also on the public transport corridor.</p> <p>C2a Similar to C2b, any development towards the southern border would be better related to the main settlement of Cheltenham and could help support the town and its facilities. The small settlement of Southam lies in the centre of this broad location area, any large scale development close or near to this small centre would have</p>	

				a negative impact on the objective to create and support a vibrant community.	
12. and 13. Sustainable Communities				These objectives will be considered at a later stage in the SA/SEA process during the more detailed design and masterplanning stages.	
14. Health					
14 Could development of the site improve access to local health facilities and improve health inequalities?	Yes/No			<p>C2a - There is a Doctors surgery at Severnposts Surgery, Prestbury Rd, so southern part of site <i>may</i> be within a 20 minute walk – need to check on site. Rest of site is unlikely to be in 20 minutes walk of a GP.</p> <p>C2b - Northernmost part of site may be in 20 minute walking distance of GP's and dentist located in centre of village.</p> <p>C2c – Site does not appear to be within 20 minutes walking distance of a GP surgery.</p> <p>C2d - Site unlikely to be in 20 minute walk time of primary health care facilities in Bishops Cleeve Local Centre.</p> <p>C2e - North eastern part of site may be within 20 minute walk time of GP surgeries in central Cleeve however more work required to establish this.</p> <p>Closest A&E at Cheltenham General Hospital some 5/6 km to the south.</p>	RED/AMBER
15. Housing				All the sites are likely to be able to deliver some identified housing need. The tenure split, ratio of affordable to open market, size and density of housing would form part of a more detailed assessment at a later stage in the SA/SEA process.	
16. Green Space					
16a Does the location provide the opportunity for access to the countryside and natural environment?	Yes/No			<p>C2a Good green infrastructure potential, and next to the AONB</p> <p>C2b Fairly good connectivity to like habitats east and west and useful GI potential along brookline and GWR</p> <p>C2c Little green infrastructure potential</p> <p>C2d Good green infrastructure potential along brook corridors both east and west.</p> <p>C2e Good green infrastructure links to the Cotswolds.</p>	<p>C2a GREEN</p> <p>C2b GREEN</p> <p>C2c RED</p> <p>C2d GREEN</p> <p>C2e GREEN</p>
16b Does the site contain strategic open green space?	Yes/No			Further information required.	

16c Will it ensure existing open spaces are protected and enhanced?	Yes/No	Further information required.	
17. Education			
17 a Will the site allow good access to educational facilities or the ability to support existing facility or a new facility?	Yes/No	<p>C2a - Very south of site may be within 20 minute walking time of Prestbury Primary School & very north of site may be within a 20 minute walk of Woodmancote Primary school.</p> <p>Very north of site is within a 20 minute walk of Cleeve School, rest of site won't be in 20 minute walk time of a secondary school.</p> <p>C2b - Northernmost part of site is within 20 minute walking distance of Cleeve School in Two Hedges Road and Grangefield Primary School & Bishops Cleeve Primary.</p> <p>Further work required to ascertain how much of site is within 20 minute walk catchment of both primary and secondary schools and local centre.</p> <p>C2c - Southern part of site <i>may</i> be within 20 minute walk of Pitville secondary school.</p> <p>Southern half part of site in 20 minute walk time of Warden Hill Primary School and Swindon Village Primary School</p> <p>C2d - Probably no part of site within a 20 minute walk of Cleeve Secondary School</p> <p>Western part of site <i>may</i> be within 20 minute walk of Swindon Village Primary School.</p> <p>C2e - Eastern part of site would be in 20 minute walk of Grangefield Primary School.</p> <p>Eastern part of site may be within 20 minute walk of Cleeve School however more work required to establish this.</p> <p>Further education facilities at Gloucestershire College Campus on Hesters Way in Cheltenham not directly accessible by 1 bus journey.</p>	AMBER/RED

		<p>County Info: If developed along with C1 consideration will need to be given to the cumulative impact upon the existing early year's / primary network. Particularly, when reviewing on-site or off-site options and / or when taking into account 'existing capacity' with the modelling (size and scale) of any new on-site provision.</p> <p>Similarly, the cumulative impact upon the existing secondary network (if developed alongside C1 and / or C3) will be an important issue as off-site provision is the most likely solution in this instance.</p> <p>Early advice on the requirements of other infrastructure services would be welcomed so as to give as much opportunity as possible to explore a more integrated / shared services solution (the development of the community hub model).</p>	
18. Culture and Tourism	The impact on this SA objective will form part of a more detailed SA/SEA assessment later in the JCS process.		
19. Deliverability of Site and other strategic spatial options?			
19a. Are there any known needs for essential infrastructure?		The requirements for infrastructure are currently subject to initial appraisal by infrastructure providers.	
19b. Will development of the site ensure greater self containment of the urban areas?	Yes/No	Further information required.	
19c. Is the site within the Green Belt (summarise findings of greenbelt review).	Yes/No	<p>The whole of this site is within the current designated greenbelt.</p> <p>A recent review of the greenbelt by Entec considered C2 as a number of separate parcels of land, all of which were felt to be significant in terms of the purpose of the greenbelt.</p> <p>C2a – NE20, NE21, NE22 in the review. These parcels of land were found to provide a significant contribution towards the greenbelt designation. NE20 and NE21 land lying immediately south of Bishops Cleeve bounded by Hydebrook to the South, the B4632 to the East, the Cheitenham-Honeybourne railway to the west and Hyde Brook to the South forms the</p>	

	<p>southern boundary of Bishops Cleeve preventing sprawl to the south and east of Southam. NE22 land lying immediately to the North of Cheltenham bounded the Cheltenham/Honeybourne railway to the north-west and Hyde Brook to the north east and the variable urban edge of Cheltenham to the south, was also found to form part of the Northern boundary of Cheltenham, preventing sprawl although there are strong urbanizing influences around the racecourse and around Prestbury village. All three segments were found to play a significant contribution in preserving the setting and special character of Cheltenham, and safeguarding the countryside from encroachment as well as preventing Bishops Cleeve and Cheltenham from merging into one another.</p> <p>C2b – is equivalent to parcel of land NE19 in the Greenbelt review. Land lying immediately to the south of Bishops Cleeve bounded by the A435 to the west, the Cheltenham-Honeybourne railway to the east and the variable urban edge of Bishops Cleeve to the North. This parcel of land was considered critical to the separation of Cheltenham and Bishops Cleeve characterized by pastoral land use with variable boundary definition, and openness allowing extensive views to the AONB to the east. C2b prevents the southern expansion and merging of Bishops Cleeve towards Cheltenham and its encroachment into the countryside.</p> <p>C2c – consists of part of parcel of land NE18 in the greenbelt review. Land immediately to the north of Cheltenham, bounded by the Cheltenham-Honeybourne railway to the West, Hyde Lane to the North, the A435 to the East and Swindon Lane to the south. This land was considered critical to the separation of Cheltenham and Bishops Cleeve. If this land were to be developed the two would join up. Swindon Lane forms a clear urban edge to the north of Cheltenham. This parcel of land has a significant contribution towards checking the unrestricted sprawl of the built up areas, preventing them merging into one another, safeguarding the countryside from encroachment and preserving the setting and historic character of Cheltenham.</p> <p>C2d – consists of all of parcel of land NE 17 and the Southern half of NE16 in the greenbelt review. NE17, land bounded by Hyde Brook to the north, the Birmingham/Bristol railway to the west and Hyde Lane to the south-east was found to play a significant contribution forming part of the open land</p>	
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		<p>between Cheltenham and Bishops Cleeve.</p> <p>C2e forms the northern half of NE16 in the greenbelt review. This land forms the south-western boundary of Bishop's Cleeve preventing its westward expansion and sprawl around Brockhampton,</p>	
<p>Conclusion:</p> <p>C2a Land between the GW Railway and the AONB, performed particularly poorly in the sustainability assessment especially as regards landscape sensitivity, biodiversity value, likelihood to fragment important habitats and the need to protect rural settlements from urban sprawl. This sub-area is designated in the local plan as a special landscape area and lies adjacent to the AONB. Due to the openness of the area, scope for mitigation for any development would be difficult without detrimental effects on its overall character and value. The part of the site nearest the southern boundary of this site would be better related to Cheltenham, however this part of the site is constrained due to flood risk. In conclusion it is recommended that this sub-area of Broad Location C2 be removed from the JCS Broad Location Search.</p> <p>C2b Land between the GW Railway and the A435. Was found to have some biodiversity value, although generally poor biodiversity potential and moderate to high landscape sensitivity. Floodrisk is not considered to be a constraint but this sub area is considered to form an important strategic landscape buffer between Bishops Cleeve and Cheltenham. Most of the site is closer to Bishops Cleeve than Cheltenham and is therefore mainly remote from the main urban centre. The southernmost part of this sub-area is better connected and is also on the public transport corridor. In conclusion most of this site is unlikely to be considered one of the more sustainable locations within the JCS search and it is recommended that it be removed from the JCS broad location search.</p> <p>C2c Land to the West of Cheltenham Race Course, performed reasonably well against most of the sustainability objectives. It was considered to have a low biodiversity value compared to many of the other broad location areas, flood risk is not considered to represent a constraint in this sub area of C2, Generally the landscape value is of low amenity, historic or ecological value, although parts of the site have clear distant views to the Malvern Hills and in part to the Cotswolds. It was considered to have a moderate landscape value, although parts of the site are clearly more sensitive than others. The northern boundary of this sub area is peripheral to Cheltenham and its range of services, facilities and employment opportunities. Any development in this part of the sub-area would be expected to have a positive impact on the objective to create and sustain a vibrant community which would support the existing town and city centres. In conclusion it's recommended that this sub-area be retained in the JCS Broad Location Search and undergo a more detailed sustainability appraisal.</p> <p>C2d land between the mainline railway and the A435. Was found to have some good biodiversity value and potential. This site is partially constrained by flood zone and was considered to have an overall landscape sensitivity rating of moderate to high. Whilst the landscape is generally of low amenity with little ecological value, its location viewed from the AONB makes it fairly prominent and a key part of the green division between Bishops Cleeve and Cheltenham. However the southern most part of this sub-area is reasonably close to central Cheltenham and is close to the public transport corridor, therefore any development in this part of the sub area may be more sustainable in terms of accessibility to key facilities, services and employment sites. It is recommended therefore that the most southern part of this site (the part most peripheral to Cheltenham) be retained within the JCS search and undergo more detailed sustainability</p>			

appraisal.

C2e This sub-area of C2 performed poorly against most of the sustainability objectives. The site includes a SSSI and BAP habitat close to Wingmore Farm landfill site. The north west quadrant of the site lies within a current landfill site which means a large part of this area cannot currently be developed, and it is expected that post landfill completion this part of the sub-area could have high biodiversity potential provided it is re-landscaped sympathetically. Whilst flooding is not considered to be a constraint, this area is remote from the main settlement of Cheltenham and its development is therefore not expected to support the existing town centre. Its development could unlock some identified needed facilities in nearby Bishops Cleeve, but would be more likely towards the continued urban sprawl of this village (which has already seen significant housing growth in recent years) westwards towards Brockhampton and increased commuting to the main centres. For these reasons it is recommended that this sub-area of Broad Location C2 cannot be considered to be one of the least sustainable locations and it be removed from the JCS Broad Location Search.

County Libraries info:

If strategic-scale development growth is taken forward in this locality (several thousand units across C1 and / or C2 and / or C3) careful consideration will need to be given to a review of the form and status of the proposed local tiered libraries. This may also result in new (on-site) facilities and / or significant re-modelling of the existing provision.

JCS Sustainability Appraisal – Broad Locations

Site Reference No. C3 Land to the North West Cheltenham

Total Area of Site 827.59

SA Objective/Indicator	Notes and Commentary	Performance
3. Biodiversity		
1a Does the broad location contain sites of biodiversity value e.g. SSSI?	Yes	GREEN
1b Is the broad location within 5km of a European Designated Site (SAC or SPA)	No	GREEN
1c Are there designated BAP Priority Habitats on the site?	No	GREEN
1d Would development of the site be likely to lead to fragmentation of important habitats	Yes/No	AMBER
1e Will development of the site offer opportunities to link important habitats/create wildlife corridors?	Yes/No	AMBER
Overall likely biodiversity impact?	Biodiversity quality is low/moderate existing biodiversity value with moderate/high potential. There are a number of protected species Wildlife Corridor value is high. Predominantly flat open landscape with large arable fields and large landfill site to the North East of the site. Areas of interest include land to the North of Elmstone Hardwick where field pattern is smaller and hedgerows are in a better condition, with associated orchard and small woodland and occasional veteran tree. The River Chelt runs through the site. Predominantly arable up to brook line with limited exception. Some semi improved grassland and better hedge structure to south of Landfill site.	AMBER
2. Climate Change Mitigation	For the purposes of broad location SA this objective considers renewable energy potential only. Reduction of carbon emissions through location and transport are dealt with under SA Objective 8. Design of	Reduction

	development to reduce carbon will form part of later detailed masterplanning stage of selected broad locations.			
2a Does the site have any renewable energy resource potential?	Yes/No	Limited/no wind potential. Limited/no hydropower potential. High energy crop potential.		
2b Is there large energy/heat demand potential from facilities/premises in the area that could benefit from excess heat from decentralized energy e.g. hospital/leisure centre/large manufacturer?	Yes/No			
3. Climate change Adaptation	This objective is not assessed as part of the broad locations SA. Flooding is considered separately and other climate change adaptation techniques will be a fundamental part of the design of individual developments rather than site specific.			
4. Flooding Does the broad location contain areas in Flood Zones 2, 3a or 3b? If so give approximate percentage of the site affected.	Flood zone 2	Flood zone 3a	Flood zone 3b	AMBER The River Swillgate transects the site from the sites north western boundary, splitting in the centre of the site and continuing to both the sites eastern and southern boundaries. TBLP considers the Dean Brook a High Risk Flood Area, under Policy EVT5. SFRA Level 1 further identifies this course as flood zone 2 and flood zone 3b. Flood zones 2 and 3b wrap around the administrative boundary of Cheltenham from north to south east and towards the south west. The flood zone splits this broad location into three. The northern most area is totally cut off from the main urban centre by floodplain and therefore, flood zone could be a constraint for the northern area of the site.
	Yes 10%		Yes 10%	
5 & 6 Natural Resources				
5a Is the site brownfield or Greenfield (if Greenfield state approximate percentage of total area)?	Greenfield	Predominantly Greenfield		
5b Does the site contain	%			
	Yes/No			

any existing buildings which could be refurbished?							
5c Does the site contain landscape designations e.g. AONB, local designation.	No		No landscape designations			GREEN	
5d Overall judgement of landscape sensitivity			Settled Unwooded Vale. Generally flat. The overall landscape sensitivity to a specific type of change and as a factor of landscape character sensitivity and visual sensitivity has been judged to be 'moderate'. The corridor following the River Swilgate provides a key feature in the landscape that contributes to the setting experienced by users of the public footpaths in the vicinity.			AMBER	
5e Does the site contain high grade agricultural land – Grades 1,2 and 3a (if give the approximate percentage)	No	Grade 1 %	Yes Grade 2 30 %	No Grade 3 70 %	Predominantly Grade 3 with a large swathe of Grade 2 across the middle of the site.		
5f Would development of the site help clean up contaminated land or eradicate invasive alien plants e.g. Japanese Knotweed?	Yes/No		There are some concerns in relation to the presence of an historic and existing landfill, an industrial waste transfer station, a rifle range and a railway line.				
6a Are there known mineral deposits? Are these viable and will they need to be extracted before development?	Yes		There are known sand and gravel deposits (and engineering clays) covering the Wingmoor East Landfill (see C2), these deposits extend into the northern part of this parcel of land towards Stoke Orchard. There is a small deposit north of the Hyde Brook, but this forms part of the area currently permitted as landfill (operated by Cory Environmental). There are also some smaller sand and gravel deposits in Swindon Village and the surrounding parish and within Uckington Parish.				
6b Are there any water supply constraints?	Yes		SIDP – major reinforcement required				
6c Are there any Sewerage Network/Capacity constraints	Yes		SIDP – waste water – low to medium requirements expected				

<p>11 Historic Environment</p>			
<p>7a Does the site contain areas of archaeological significance or historic value.</p>	<p>Yes/No</p>	<p>There are a number of archaeological features in this area. Grade 1 listed building – Chapel of St James the Great located in Stoke Orchard along with other grade II listed buildings in a linear form throughout the village following the main road west to east. A small number of listed buildings south west of the site in Uckington and Elmstone Hardwicke.</p>	
<p>7b Is the broad location within (or partly within) a Conservation Area</p>	<p>No</p>	<p>Scheduled Monument at Tredington Site abuts Swindon Village Conservation Area identified on Cheltenham Borough Local Plan Proposals Map.</p>	<p>AMBER</p>
<p>8. Transport</p>			
<p>8a Is the broad location in, or close to, an area of high accessibility to key facilities</p>	<p>Yes/No</p>	<p>South eastern periphery of site abuts the main built up area of Cheltenham. Access to a range of key services therefore available in close proximity. The central and northern areas of the site are increasingly remote from Cheltenham.</p>	<p>AMBER</p>
<p>8b Is the site well connected to the transport infrastructure network, and will the location provide opportunities to support travel by non car modes.</p>	<p>Yes/No</p>	<p>The A4019 Tewkesbury Road runs along the southern periphery of the site and provides direct access to the M5 junction 10 and into Cheltenham Town Centre. High frequency bus routes run along Tewkesbury Road. Opportunities exist to support travel by non-car modes for the southern and central parts of this broad location due to the sites location to the north-west periphery of Cheltenham.</p>	<p>GREEN/AMBER</p>
<p>8c Are there any Highway Junction capacity constraints?</p>	<p>Yes/No</p>	<p><u>Problems:</u></p> <ul style="list-style-type: none"> ▪ A4019 Tewkesbury Road has limited capacity for additional traffic or for bus priority measures, especially from railway bridge onwards. ▪ Honeybourne Line bridge at Lower high street a throttle. ▪ Highways Agency opposed to all ways movement at Junction 10 of the M5 – want to avoid local traffic mixing with strategic traffic. However, this could equally apply to all Cheltenham Peripheral sites to the north, northwest and west of the main urban centre. Should any of these broad locations be taken forward for further development further discussions would need to be held with HA as it may be necessary to provide all ways movement at Junction 10. ▪ Princess Elizabeth Way and routes through Western Cheltenham have limited capacity and environmental impacts of additional traffic would be 	

			Cheltenham on a public transport route with a range of employment opportunities. Northern part of site is not close to a range of existing employment opportunities.	
20. City and Town Centres Does the site have the ability to create and sustain a vibrant community? Will it support the existing town and city centre facilities or will it help unlock identified needed facilities?	Support Existing Yes/No	Unlock new Yes/No	The northern part of this broad location is not expected to contribute towards this objective due to its distance away from the main urban fringe and also connectivity issues. However, the central area and particularly the southern area of this broad location are well located for access into Cheltenham. New development in these locations would be expected to have a positive impact on the objective to sustain a vibrant community and support the existing town centre facilities.	AMBER
12. and 13. Sustainable Communities	These objectives will be considered at a later stage in the SA/SEA process during the more detailed design and masterplanning stages.			
14. Health 14 Could development of the site improve access to local health facilities and improve health inequalities?	Yes/No	None of site within easy 20 minute walking distance of a GP surgery or dental practice. Any large scale development within this area may require the provision of additional community health infrastructure. Closest A&E at Cheltenham General Hospital some 5/6 km to the south east.		RED
15. Housing	All the sites are likely to be able to deliver some identified housing need. The tenure split, ratio of affordable to open market, size and density of housing would form part of a more detailed assessment at a later stage in the SA/SEA process.			
16. Green Space 16a Does the location provide the opportunity for access to the countryside and natural environment?	Yes/No	Good potential green infrastructure link with the River Chelt beyond M5 to the River Severn (although the M5 does cut across it).		
16b Does the site contain strategic open green space?	Yes/No	Sports Ground identified adjacent to south eastern boundary of site at Swindon village. Allotments to south east of site at Swindon Village. No other strategic open green space.		GREEN

<p>16c Will it ensure existing open spaces are protected and enhanced?</p>	<p>Yes/No</p>		
<p>17. Education 17 a Will the site allow good access to educational facilities or the ability to support existing facility or a new facility?</p>	<p>Yes/No</p>	<p>Some parts of south eastern sector of site within 20 minute walk of Swindon Village Primary School. Rest of site not within 20 minute walk of a primary school. Any new large scale housing development on this broad location area may require a new primary school.</p> <p>Currently site is not in 20 minute walking distance of a secondary school however, southern part of site would be within 20 minute walk of All Saints Academy when it opens in Sept 2011 on old Kingsmead School site however walking route truncated by dual carriageway of Tewkesbury Road.</p> <p>Further education facilities at Gloucestershire College on Hesters Way however no direct bus route from the site.</p> <p>County Info: If developed along with C2 and / or C5 consideration will need to be given to the cumulative impact upon the existing early year's / primary network. Particularly, when reviewing on-site or off-site options and / or when taking into account 'existing capacity' with the modelling (size and scale) of any new on-site provision.</p> <p>Similarly, the cumulative impact upon the existing secondary network (if developed alongside C1 and / or C2 and / or C5) will be an important issue particularly as notable on-site provision is the most likely solution in this instance.</p> <p>Early advice on the requirements of other infrastructure services would be welcomed so as to give as much opportunity as possible to explore a more integrated / shared services solution (the development of the community hub model).</p>	<p>AMBER/RED</p>
<p>18. Culture and Tourism 19. Deliverability of Site and other strategic spatial options?</p>	<p>The impact on this SA objective will form part of a more detailed SA/SEA assessment later in the JCS process.</p>		

<p>19a Are there any known needs for essential infrastructure?</p>		<p>The requirements for infrastructure are currently subject to initial appraisal by infrastructure providers.</p>	
<p>19b Will development of the site ensure greater self containment of the urban areas?</p>	<p>Yes/No</p>	<p>Yes, development on those parts of this broad location closest to the urban centre of Cheltenham would be expected to lead to a greater self containment of the urban areas. Especially if the mix of any housing development considers the needs of affordable and low-cost open market housing for key sector workers.</p>	<p>GREEN</p>
<p>19c Is the site within the Green Belt (summarise findings of greenbelt review).</p>	<p>Yes</p>	<p>All of Broad Location C3 is within the current designated greenbelt. A recent greenbelt review undertaken by Entec considered the broad location as discrete segments of land (NE8 to NE15). Land north-west of Cheltenham segments NE9, 10, 11 and 12 were considered to make some contribution toward the function of the Greenbelt. This land forms the outer extent of the greenbelt and is bounded to the west by the M5, the A4019 (Tewkesbury Road) to the south, the Bristol/Birmingham railway to the east and Stoke Road to the north. This land plays a role in checking sprawl along the A4019 corridor through Uckington, and while this function is clear, other Green Belt functions are much less obvious.</p> <p>Sections NE8 and NE13 comprising land to the west of Kingsditch and Swindon although dominated by extensive arable agricultural land are also characterized by ribbon development along the A4019 and in the case of NE8 a number of plant nurseries. NE13 also comprises rough pasture associated with the River Swilgate and this is an important landscape feature. The land performs no separation role between Cheltenham and Gloucester, or Cheltenham and Bishop's Cleeve, this being the function of segments to the south and east of this land. The review considered that there are potential opportunities for boundary revision towards the south east without compromising the major function of the greenbelt.</p> <p>Sections NE14 and NE15 land to the west of Brockhampton between the railway line to the east, and land between Brockhampton Lane and the Birmingham/Bristol railway immediately to the north of Swindon, were both felt to have no visual connection to Cheltenham and therefore only had limited contribution in relation to preserving the setting and special character of the town. Both of these segments were also felt to have a limited contribution in relation to checking sprawl, however overall these two sections were felt to have a significant contribution in preventing Bishops Cleeve merging into Cheltenham, and preventing encroachment into the</p>	

	countryside northwards of Cheltenham.	<p>Conclusion: This broad location came out as average against most of the sustainability objectives. However it is a large broad location, and the northernmost part of it is not well located or easily accessible. The site naturally splits into three by the flood zone. If this broad location was reduced in size through the removal of the northern section, this broad location would have scored extremely favourably against most of the sustainability objectives. Parts of this broad location, in particular land at Uckington and Swindon to the South East of this site, did not score well in the recent Green Belt Review; they were considered to perform no separation role between the urban areas. In conclusion parts of this broad location are likely to perform well against the sustainability objectives in particular reducing the need to travel by private car and helping to ensure the continued vitality and vibrancy of the main urban centres. These areas may perform well against the sustainability objectives and could be taken forward in the JCS process for a more in depth sustainability appraisal.</p> <p>County libraries info: If strategic-scale development growth is taken forward in this locality (several thousand units across C1 and / or C2 and / or C3 and / or C5) careful consideration will need to be given to a review of the form and status of the proposed local tiered libraries. This may also result in new (on-site) facilities and / or significant re-modelling of the existing provision.</p>
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JCS Sustainability Appraisal – Broad Locations

Site Reference No. C4 Land a distance to the West of Cheltenham incl. Boddington Total Area of Site: 540.23 ha

SA Objective/Indicator	Notes and Commentary	Performance
Biodiversity		
1a Does the broad location contain sites of biodiversity value e.g. SSSI?	No	
1b Is the broad location within 5km of a European Designated Site (SAC or SPA)	Yes Ashleworth Ham located 5km to the west of the site.	
1c Are there designated BAP Priority Habitats on the site?	Yes Coastal and floodplain grazing marsh located west/centrally within the site.	
1d Would development of the site be likely to lead to fragmentation of important habitats	Yes/No Not assessed.	
1e Will development of the site offer opportunities to link important habitats/create wildlife corridors?	Yes/No Not assessed.	
Overall likely biodiversity impact?	High (Red), Medium (Amber), Low (Green)	
2. Climate Change Mitigation	For the purposes of broad location SA this objective considers renewable energy potential only. Reduction of carbon emissions through location and transport are dealt with under SA Objective 8. Design of development to reduce carbon will form part of later detailed masterplanning stage of selected broad locations.	
2a Does the site have any renewable energy resource potential?	Yes/No Not assessed.	
2b Is there large energy/heat demand potential from facilities/premises in the	Yes/No Not assessed.	

area that could benefit from excess heat from decentralized energy e.g. hospital/leisure centre/large manufacturer?			
3. Climate change Adaptation	This objective is not assessed as part of the broad locations SA. Flooding is considered separately and other climate change adaptation techniques will be a fundamental part of the design of individual developments rather than site specific.		
4. Flooding Does the broad location contain areas in Flood Zones 2, 3a or 3b? If so give approximate percentage of the site affected.	Flood zone 2	Flood zone 3a	Flood zone 3b
	Yes 5%	Yes 1%	Yes 15%
Both the north eastern and north western boundary are affected by Flood Zones 2 and 3b. Both the River Chelt and Leigh Brook are situated within the northern half of the site and are recognised in the TBLP as a High Risk Flood Area, under Policy EVT5. A small area to the southern site boundary is affected by Hatherley Brook, this area is affected by Flood Zones, 2, 3a and 3b.			
5 & 6 Natural Resources			
5a Is the site brownfield or Greenfield (if Greenfield state approximate percentage of total area)?	Greenfield %	Predominantly Greenfield	
5b Does the site contain any existing buildings which could be refurbished?	Yes/No	Not assessed.	
5c Does the site contain landscape designations e.g. AONB, local designation.	Yes/No	Not assessed.	
5d Overall judgement of landscape sensitivity		Not assessed.	
5e Does the site contain high grade agricultural land – Grades 1,2 and 3a (if give the approximate percentage)	Yes/No Grade 1 %	Yes/No Grade 2 %	Yes/No Grade 3 % Not assessed
5f Would development of	Yes/No	Not assessed	

the site help clean up contaminated land or eradicate invasive alien plants e.g. Japanese Knotweed?			
6a Are there known mineral deposits? Are these viable and will they need to be extracted before development?	Yes/No	Not assessed	
6b Are there any water supply constraints?	Yes/No	Not assessed	
6c Are there any Sewerage Network/Capacity constraints	Yes/No	Not assessed	
Historic Environment			
7a Does the site contain areas of archaeological significance or historic value.	Yes/No	Not assessed	
7b Is the broad location within (or partly within) a Conservation Area	Yes/No	Grade I listed building – Church of St Mary Magdalene located in Boddington and four grade II listed buildings running north to south in Boddington village. Small cluster of listed buildings within the village of Staverton towards the south of the Broad Location. No	
8. Transport			
8a Is the broad location in, or close to, an area of high accessibility to key facilities	Yes/No	Not assessed	
8b Is the site well connected to the transport infrastructure network, and will the location provide opportunities to support travel by non car modes.	Yes/No	Not assessed	
8c Are there any Highway	Yes/No	Not assessed	

Junction capacity constraints?			
21. Waste and Pollution			
9a Is the site close to or within a reduced air quality area?	Yes/No	Not assessed	
9b Is the site close to an existing or planned waste processing facility?	Yes/No	Not assessed	
10. Economy			
10a Is the broad location suitable for a mix of employment opportunities?	Yes/No	Not assessed	
10b Is the broad location close to a range of existing employment opportunities?	Yes/No	Not assessed	
22 City and Town Centres			
Does the site have the ability to create and sustain a vibrant community? Will it support the existing town and city centre facilities or will it help unlock identified needed facilities?	Support Existing Yes/No	Unlock new Yes/No	Not assessed
12. and 13. Sustainable Communities			
These objectives will be considered at a later stage in the SA/SEA process during the more detailed design and masterplanning stages.			
14. Health			
14 Could development of the site improve access to local health facilities and improve health inequalities?	Yes/No	Not assessed	
15. Housing			
All the sites are likely to be able to deliver some identified housing need. The tenure split, ratio of			

affordable to open market, size and density of housing would form part of a more detailed assessment at a later stage in the SA/SEA process.	
16. Green Space	
16a Does the location provide the opportunity for access to the countryside and natural environment?	Yes/No Not assessed
16b Does the site contain strategic open green space?	Yes/No Not assessed
16c Will it ensure existing open spaces are protected and enhanced?	Yes/No Not assessed
17. Education	
17 a Will the site allow good access to educational facilities or the ability to support existing facility or a new facility?	Yes/No Not assessed
18. Culture and Tourism	
The impact on this SA objective will form part of a more detailed SA/SEA assessment later in the JCS process.	
19. Deliverability of Site and other strategic spatial options?	
19a Are there any known needs for essential infrastructure?	The requirements for infrastructure are currently subject to initial appraisal by infrastructure providers.
19b Will development of the site ensure greater self containment of the urban areas?	Yes/No Not assessed
19c Is the site within the Green Belt (summarise findings of greenbelt review).	Yes/No Not assessed
Conclusion:	

JCS Sustainability Appraisal – Broad Locations

Site Reference No. C5 Land to the west of Cheltenham Total Area of Site 578.68

SA Objective/Indicator	Notes and Commentary	Performance
<p>4. Biodiversity</p> <p>1a Does the broad location contain sites of biodiversity value e.g. SSSI?</p>	<p>Yes</p>	<p>A site dominated by improved grassland with species-poor hedgerows. There are also some arable fields and fields that are currently fallow. Scattered broadleaved trees occur across the site, some of which have the potential as future veteran trees. The hedgerows include mature trees, notably ash and oak.</p> <p>Contains a Key Wildlife Site and protected species adjacent to Cheltenham urban fringe on east of site.</p> <p>Overall low/moderate biodiversity value with moderate/high potential biodiversity.</p>
<p>1b Is the broad location within 5km of a European Designated Site (SAC or SPA)</p>	<p>No</p>	<p>GREEN</p>
<p>1c Are there designated BAP Priority Habitats on the site?</p>	<p>Yes</p>	<p>RED</p>
<p>1d Would development of the site be likely to lead to fragmentation of important habitats</p>	<p>Yes/No</p>	<p>Connectivity to broader habitat types would be good but is somewhat hampered to the west and south by significant transport infrastructure, and to the east by Cheltenham town.</p>
<p>1e Will development of the site offer opportunities to link important habitats/create wildlife corridors?</p>	<p>Yes/No</p>	<p>Wildlife Corridor value is High.</p>
<p>Overall likely biodiversity impact?</p>	<p>Area of mixed farming and gentle undulating landscape. Area around Hayden Sewage works and nearby manor house have semi improved grassland, good hedgerow structure and mature park land trees (potentially veteran oaks). To the south of this around Pheasant Lane and the B4063 there is a much smaller field pattern, old orchard and smallholding land use which provides a more diverse background habitat. Similar</p>	<p>AMBER</p>

	<p>can be said for land adjacent to Old Gloucester Road and Tewkesbury Road close to the urban area of Cheltenham where there are old orchards, smallholdings and an old moat.</p> <p>The rest of the area is largely arable with large field systems and poor hedgerow structure. There are some more interesting areas of plantation woodland and riparian habitats though very restricted. North West part of the site is particularly biodiversity poor.</p> <p>Overall low/moderate biodiversity value with moderate/high potential biodiversity.</p>							
<p>2. Climate Change Mitigation</p>	<p>For the purposes of broad location SA this objective considers renewable energy potential only. Reduction of carbon emissions through location and transport are dealt with under SA Objective 8. Design of development to reduce carbon will form part of later detailed masterplanning stage of selected broad locations.</p>	<p>Reduction of carbon emissions through location and transport are dealt with under SA Objective 8. Design of development to reduce carbon will form part of later detailed masterplanning stage of selected broad locations.</p>						
<p>2a Does the site have any renewable energy resource potential?</p>	<p>Yes/No</p>	<p>Potential – Hayden Sewerage Treatment Works for heat/energy generation?</p>						
<p>2b Is there large energy/heat demand potential from facilities/premises in the area that could benefit from excess heat from decentralized energy e.g. hospital/leisure centre/large manufacturer?</p>	<p>Yes/No</p>							
<p>3. Climate change Adaptation</p>	<p>This objective is not assessed as part of the broad locations SA. Flooding is considered separately and other climate change adaptation techniques will be a fundamental part of the design of individual developments rather than site specific.</p>							
<p>4. Flooding Does the broad location contain areas in Flood Zones 2, 3a or 3b? If so give approximate percentage of the site affected.</p>	<table border="1"> <thead> <tr> <th data-bbox="1182 1563 1316 1691">Flood zone 2</th> <th data-bbox="1182 1451 1316 1563">Flood zone 3a</th> <th data-bbox="1182 1348 1316 1451">Flood zone 3b</th> </tr> </thead> <tbody> <tr> <td data-bbox="1316 1563 1453 1691">Yes</td> <td data-bbox="1316 1451 1453 1563">Yes</td> <td data-bbox="1316 1348 1453 1451">Yes</td> </tr> </tbody> </table>	Flood zone 2	Flood zone 3a	Flood zone 3b	Yes	Yes	Yes	<p>The northern area of the site is traversed west to east by the River Chelt. Land to the north of the River Chelt falls within most within Flood Zone 2 and 3b, a further area to the south of the River Chelt is further affected by Flood Zone 3b.</p> <p>The southern area of the site is traversed by Hatherley Brook and is further affected by Flood Zones, 2, 3a and 3b.</p>
Flood zone 2	Flood zone 3a	Flood zone 3b						
Yes	Yes	Yes						

	20%	10%	1%	TBLP recognizes the aforementioned channels as High Risk Flood Areas, under Policy EVT5. North East/Northern boundary area is significantly constrained.	
5 & 6 Natural Resources					
5a Is the site brownfield or Greenfield (if Greenfield state approximate percentage of total area)?	Greenfield 75 %			Site is predominantly green field however it includes Hayden Green Sewage Treatment Works in southern centre of site; ribbon development at Uckington to north of site, either side of the Golden Valley in south of site and along Old Gloucester Road northern middle of site.	AMBER
5b Does the site contain any existing buildings which could be refurbished?	No			Agricultural buildings which might be capable of conversion.	
5c Does the site contain landscape designations e.g. AONB, local designation.	No	No			GREEN
5d Overall judgement of landscape sensitivity				ANNICE/TRACEY Red – High, Amber – Medium, Green – Low (From Holly's BL File - Settled Unwooded Vale. Relatively flat land drained by the Chelt. Low ridge to north of A4019 obscures views of Swindon Village. Urban fringe character. Land drops away from Springbank to the SW across Hayden Works to Hayden Knoll. Residential ribbon development around Golden Valley & Bamfurlong – also other incongruous uses (e.g. caravans, coaches, scrap cars, depot). Treatment Works contains prominent structures. Views to the west obscured by topography around J11).	
5e Does the site contain high grade agricultural land – Grades 1,2 and 3a (if give the approximate percentage)	No Grade 1 %	No Grade 2 %	Yes Grade 3 100%	The whole site is designated grade 3 agricultural.	GREEN
5f Would development of the site help clean up contaminated land or eradicate invasive alien plants e.g. Japanese	Yes/No			There are some concerns in relation to the presence of Hayden Sewage Treatment Works.	

Knotweed?				
6a Are there known mineral deposits? Are these viable and will they need to be extracted before development?	Yes	There are some sand and gravel deposits in the north of the area.		
6b Are there any water supply constraints?	Yes/No	Unknown – SIDP did not evaluate this area		NOT ASSESSED
6c Are there any Sewerage Network/Capacity constraints	Yes/No	Unknown – SIDP did not evaluate this area		NOT ASSESSED
12 Historic Environment				
7a Does the site contain areas of archaeological significance or historic value.	Yes/No	There are a number of Archaeological Sites in the vicinity of this Scenario. These would need to be further investigated and recorded before any development takes place Small cluster of listed buildings along the northern boundary of the Broad Location close to Uckington plus Scheduled Ancient Monument at Uckington.		
7b Is the broad location within (or partly within) a Conservation Area	Yes/No	No		
8. Transport				
8a Is the broad location in, or close to, an area of high accessibility to key facilities	Yes/No	Eastern periphery of site abuts the main built up area of Cheltenham where there is good access to a good range of key facilities.		
8b Is the site well connected to the transport infrastructure network, and will the location provide opportunities to support travel by non car modes.	Yes/	This broad location is well accessed by road. The A4019 Tewkesbury Road runs along the northern periphery of the site and the B4643 Old Gloucester Road dissects the site west to east. Regular bus services run in close proximity to the site including Tewkesbury Road. Opportunities exist to support travel by non car modes given the site's location to the western periphery of Cheltenham.		
8c Are there any Highway Junction capacity constraints?	Yes	<u>Problems</u> <ul style="list-style-type: none"> • Congestion on existing local road network would necessitate NW Cheltenham Relief Road to support any significant housing 		

		<p>proposals.</p> <ul style="list-style-type: none"> • Previous proposals for NW Cheltenham Relief Road have been dropped. <p><u>Possible Solutions/Opportunities:</u></p> <ul style="list-style-type: none"> • NW Cheltenham Relief Road linking A40 with A4019 would provide local traffic relief to Princess Elizabeth Way. • Better located in respect to access to Cheltenham Railway Station. • If developed in conjunction with G1 and G2 would provide stronger opportunities for investment in major improvements to local highway and bus networks – links between A40 at Innsworth to A4019 would benefit local roads. Harder to achieve if developed in isolation. <p>County Info:</p> <p>If developed along with C3 consideration will need to be given to the cumulative impact upon the existing early year's / primary network. Particularly, when reviewing on-site or off-site options and / or when taking into account 'existing capacity' with the modelling (size and scale) of any new on-site provision.</p> <p>Similarly, the cumulative impact upon the existing secondary network (if developed alongside C3 and / or C2 and / or G2) will be an important issue as off-site provision is the most likely solution in this instance.</p> <p>Early advice on the requirements of other infrastructure services would be welcomed so as to give as much opportunity as possible to explore a more integrated / shared services solution (the development of the community hub model).</p>	
<p>22. Waste and Pollution</p> <p>9a Is the site close to or within a reduced air quality area?</p>	<p>Yes/No</p>	<p>The majority of the central eastern part of the site (around Fiddlers Green/Hayden Area) is allocated under Tewkesbury Borough Local Plan as Policy EVT8: Development near sewage treatment works. Development will not be permitted which would be adversely affected by odour pollution within the "cordons sanitaire" around the sewage treatment works.</p>	

			Because of naturally occurring smells from sewage treatment, the policy advises that a zone should be kept free of development around specific sewage works, where the effluent treated is equivalent to that of a population greater than 2000.	
9b Is the site close to an existing or planned waste processing facility?	No			
10. Economy 10a Is the broad location suitable for a mix of employment opportunities?	Yes		<p>Southern part of site well located for access to M5 motorway at junction 11 and could attract, for example, a business park for industries which serve GCHQ which lies close to eastern boundary of the site.</p> <p>The ELR considers that 8 hectares of land at Fiddler's Green could be developed for industrial use to meet Cheltenham's future employment land requirement.</p> <p>Existing small industrial estates lie along Cheltenham Road East in south of site which could be expanded to provide additional employment land.</p> <p>Northern part of site close to Junction 10 however further investment in infrastructure required for this to become an all ways junction.</p> <p>Existing employment areas at Arle Court to south east of site plus GCHQ to south east of site.</p> <p>Existing industrial estates adjacent to Golden Valley in west of the site plus employment opportunities at Staverton airport to west of site including large local employer Messier Dowty.</p> <p>Site lies in close proximity to Cheltenham town centre with a range of employment opportunities with bus routes through south of site including no. 94 and bus routes to north of site along Tewkesbury Road both offering sustainable transport options to centre of Cheltenham.</p>	GREEN/AMBER
10b Is the broad location close to a range of existing employment opportunities?	Yes			GREEN
23 City and Town Centres Does the site have the ability to create and sustain a vibrant community? Will it	Support Existing Yes/No		<p>Unlocked new</p> <p>The Eastern part of this site is well located in relation to the main urban settlement of Cheltenham. Opportunities exist to support travel into the main centre by non-car roads, development along the Eastern boundary of this broad location would have a positive impact on this objective, with easy access into the town and to its</p>	GREEN/AMBER

support the existing town and city centre facilities or will it help unlock identified needed facilities?			services, facilities and employment sites and would help to ensure the continued vitality and vibrancy of Cheltenham town centre. This does not apply to the western part of the site. If this broad location were to be reduced to include the eastern half of the site only, it would have had a very positive impact on this objective.	
12. and 13. Sustainable Communities	These objectives will be considered at a later stage in the SA/SEA process during the more detailed design and masterplanning stages.			
14. Health				
14 Could development of the site improve access to local health facilities and improve health inequalities?	Yes/No		North eastern part of site in 20 minute walking distance of GP surgery on Springbank Way. Rest of site not in 20 minute walking distance of a GP Healthy living centre on Hesters Way. Closest A&E at Cheltenham General Hospital some 4.5 km to the south east.	AMBER
15. Housing	All the sites are likely to be able to deliver some identified housing need. The tenure split, ratio of affordable to open market, size and density of housing would form part of a more detailed assessment at a later stage in the SA/SEA process.			
16. Green Space				
16a Does the location provide the opportunity for access to the countryside and natural environment?	Yes/No			
16b Does the site contain strategic open green space?	Yes/No		Allotments in Cheltenham Borough to north of Bushy Way are close to this broad location. No identified POS within the site (all open countryside).	
16c Will it ensure existing open spaces are protected and enhanced?	Yes/No			
17. Education				
17 a Will the site allow good access to	Yes/No		Eastern part of site within 20 minute walking distance of Arthur Dye Primary School, more work required to help establish this 20 minute walking	AMBER

<p>educational facilities or the ability to support existing facility or a new facility?</p>		<p>catchment. Southern half of site not well served by a local primary school lying within a 20 minute walking catchment.</p> <p>All Saints Academy opening (Secondary School) opening on Blaisdon Way in Sept 2011, will be in 20 minute walking time of north eastern sector of site.</p> <p>Further education in close proximity of eastern part of site at Gloucestershire College campus on Hesters Way.</p>	
<p>18. Culture and Tourism</p>	<p>The impact on this SA objective will form part of a more detailed SA/SEA assessment later in the JCS process.</p>		<p>in the JCS</p>
<p>19. Deliverability of Site and other strategic spatial options?</p>			
<p>19a Are there any known needs for essential infrastructure?</p>		<p>The requirements for infrastructure are currently subject to initial appraisal by infrastructure providers.</p>	
<p>19b Will development of the site ensure greater self containment of the urban areas?</p>	<p>Yes/No</p>	<p>This is a very broad location, the western area is not expected to have a positive impact on this objective, however development on its Eastern boundary adjacent to the western periphery of the Cheltenham urban area would be expected to have a positive impact on this objective.</p>	
<p>19c Is the site within the Green Belt (summarise findings of greenbelt review).</p>	<p>Yes/No</p>	<p>This parcel of land covers NE1, NE2, NE3, NE34, NE5, NE6 and NE7 in the recent Green Belt Review (Land between Cheltenham and Gloucester to the east of the M5 and north of the A40). . All these parcels of land were considered to provide a significant contribution to the greenbelt. The strategic boundaries which make up this land have well defined external boundaries (Principally being roads and watercourses) and as such have a clear identity and role in preventing encroachment into the countryside.</p> <p>NE1 – Land to the West of the urban edge of Cheltenham, bounded by the M5, A40 and Bamfurlong Road to the North. A relatively heavily urbanised area mixed with agricultural land with strong hedgerow and tree boundaries, which help to maintain its open countryside character. Forms a significant contribution towards checking the unrestricted sprawl of large built up areas, it forms the western boundary to Cheltenham and prevents sprawl westwards from Gloucester.</p> <p>NE2 Land to the west of the urban edge of Cheltenham, bounded by the</p>	

		<p>M5 to the west, the B4063 to the North and Bamfurlong Road to the South and NE3 Land bounded by the B4063 to the South and Pheasant Lane to the North. Despite some significant urbanisation; the NE2 segment consists of intensively farmed, large scale arable fields characterised by open vistas. This is clearly an urban fringe landscape which is part of the countryside edge to Cheltenham and is clearly defined by the road network. The NE3 segment is a remnant agricultural landscape characterised by small scale, irregular fields with boundary hedges in favourable condition. NE 2 and NE3 form the western boundary to Cheltenham, preventing ribbon development, and play a role in preventing encroachment into the open countryside, although there are existing urbanising influences, e.g. mobile home park within area NE3.</p> <p>NE4 land immediately to the west of Cheltenham bounded by Fiddlers Green Lane to the east, Pheasant Lane/B4063 to the south, Hayden Lane to the West and the B4634 to the North; contains the western edge of Cheltenham with strong boundary features to the south, but with less clear definition to the north. It is characterised by large fields, pasture to the south, and arable to the north with expansive views.</p> <p>NE5 land bounded by the B4634 to the North, Hayden Lane to the East, the B4063 to the South and the M5 to the North, forms the north-west edge of Cheltenham. This is part of the land containing, and giving context to, the western fringes of Cheltenham. It is characterized by large, intensively farmed arable fields with expansive views.</p> <p>There is inconsistency between the most recent greenbelt assessment and an earlier study which considered this broad location area to be of high importance in terms of preventing towns merging and some importance in terms of safeguarding the countryside and encouraging the recycling of land. It was given an average ranking.</p> <p>The west and north-west were considered in this earlier study to not prevent neighbouring towns from merging. Whilst this area was recognised to have sustainable cross boundary development potential, 60% of the boundary in this area was considered to be 'weakly' defensible in the long term.</p>
<p>Conclusion: The northern part of this broad location is heavily constrained by flood zone, therefore the northernmost part of this broad location is unlikely to be suitable for development. This broad location area performed well as regards accessibility and the transport network. The central eastern part of the site near Fiddlers Green/Hayden is situated within close proximity to Hayden Sewage Works, this is likely to make this part of the broad location negative for housing development but could still allow some high tech industrial use. However,</p>		

opportunities should be sought to discuss with the water authority on both the long-term plans for the site at Hayden Sewage Works and whether the extent of the cordon sanitaire zone is correct. The southern and eastern parts of this broad location performed reasonably well, particularly against the employment potential objectives and opportunities to access Cheltenham by non-car modes, and notwithstanding constraints such as Green Belt, it is recommended that these parts of this broad location are taken forward for further consideration and more detailed appraisal in the JCS process.

County libraries Info:

Encourage early and open dialogue between potential infrastructure and service providers, particularly where alternative, integrated or shared services solution may be possible. From the library service perspective examples include:- better alignment with public transport to improve accessibility and the expansion of co-location opportunities (e.g. with youth services, children's centres, Police, GP and health care, district and / or town council services, and volunteer / 3rd sector activities etc...)

If strategic-scale development growth is taken forward in this locality (several thousand units across C5 and / or C2 and / or C3. And alternatively across C5 and C6) careful consideration will need to be given to a review of the form and status of the proposed local tiered libraries. This may also result in new (on-site) facilities and / or significant re-modelling of the existing provision.

JCS Sustainability Appraisal – Broad Locations

Site Reference No. C6 Land to the South of Cheltenham

Total Area of Site 1208.38ha

SA Objective/Indicator	Notes and Commentary	Performance
Biodiversity		
1a Does the broad location contain sites of biodiversity value e.g. SSSI?	Yes	Badgeworth a small SSSI in a favourable position is situated in the central/north western part of this broad location area. Leckhampton Hill and Charlton Kings Common SSSI are situated close to the South East boundary.
1b Is the broad location within 5km of a European Designated Site (SAC or SPA)	No	GREEN
1c Are there designated BAP Priority Habitats on the site?	No	AMBER
1d Would development of the site be likely to lead to fragmentation of important habitats	Yes	RED
1e Will development of the site offer opportunities to link important habitats/create wildlife corridors?	Yes/No	RED
Overall likely biodiversity impact?	Intimate rolling landscape, predominantly pastoral with improved and semi-improved pasture. Good hedgerow condition, and good proportion of orchard many displaying old over-mature Pery pears. Good number of parkland trees and many veteran oaks along with other species. Small pockets of woodland dotted around the site. Area around Leckhampton displays unusual land use pattern with many smallholdings, orchards and allotment/market gardens. Good brookline and associated tree cover. Overall this area displays a good mosaic of habitat types which could make mitigation difficult.	RED
2. Climate Change Mitigation	For the purposes of broad location SA this objective considers renewable energy potential only. Reduction of carbon emissions through location and transport are dealt with under SA Objective 8. Design of development to reduce carbon will form part of later detailed masterplanning stage of selected broad locations.	
2a Does the site have any	Yes/No	

renewable energy resource potential?						
2b Is there large energy/heat demand potential from facilities/premises in the area that could benefit from excess heat from decentralized energy e.g. hospital/leisure centre/large manufacturer?	Yes/No					
3. Climate change Adaptation	This objective is not assessed as part of the broad locations SA. Flooding is considered separately and other climate change adaptation techniques will be a fundamental part of the design of individual developments rather than site specific.					
4. Flooding Does the broad location contain areas in Flood Zones 2, 3a or 3b? If so give approximate percentage of the site affected.	Flood zone 2	Flood zone 3a	Flood zone 3b	Flood zone	GREEN	
				The Southern boundary of C6a along Ham Brook is designated as a small strip of flood zone. As the original C6 site area was reduced to land Northwards of Ham Brook, flooding is not considered to be a constraint to development for this broad location.		
5 & 6 Natural Resources						
5a Is the site brownfield or Greenfield (if Greenfield state approximate percentage of total area)?	Greenfield 85 %			Predominantly Greenfield however ribbon development to north east of site at The Reddings, 2 no. caravan parks at Sunneyfield Lane to north of site and a cluster of residential dwellings at Chargrove to east of site. Eastern most part of site at Leckhampton has horticultural nurseries showing on OS base together with a number of residential dwellings.		
5b Does the site contain any existing buildings which could be refurbished?	No			Only agricultural buildings worthy of retention and conversion.		
5c Does the site contain landscape designations e.g. AONB, local designation.	No		No		GREEN	
5d Overall judgement of				The landform within the study area is gently undulating and ranges from 70	AMBER/RED	

landscape sensitivity			<p>to 80m AOD in its northwest corner to 200m AOD at Leckhampton Hill. Land use is mainly pasture. Fields on the lower flatter areas are larger and more regular in pattern compared to the smaller and irregularly shaped fields on the rising slopes to the south. Woodland cover is limited but there is a large network of hedgerows, most of which are well maintained at a variety of heights with occasional trees. This creates various levels of enclosure, giving an impression of a well wooded landscape in flatter areas. Brizen - overall landscape sensitivity considered to be moderate to high Shurdington Orchards – overall landscape sensitivity considered to be moderate to high</p> <p>Leckhampton – the overall landscape sensitivity considered to be high. However, with regards to visual sensitivity the Leckhampton area is well enclosed and confined particularly towards the north</p>			
5e Does the site contain high grade agricultural land – Grades 1,2 and 3a (if give the approximate percentage)	No Grade 1	Yes Grade 2 5 %	Yes Grade 3 90%	Predominantly Grade 3, some Grade 2 in northern extent.	GREEN/AMBER	
5f Would development of the site help clean up contaminated land or eradicate invasive alien plants e.g. Japanese Knotweed?	Yes/No	There are some concerns in relation to the presence of landfills (though mostly inert) and a former quarry.				
6a Are there known mineral deposits? Are these viable and will they need to be extracted before development?	Yes	There are some sand and gravel deposits in the north eastern (Leckhampton) area and some in the south eastern area around Shurdington. The Shurdington deposit has proven economically viably and already extensively worked in the past. A parcel of land is still currently worked by Elliot and Sons, the same operator than that runs an inert waste recycling facility nearby.				
6b Are there any water supply constraints?	Yes	SIDP: local reinforcement only				
6c Are there any Sewerage Network/Capacity constraints	Yes	SIDP: high requirements anticipated				

Historic Environment			
7a Does the site contain areas of archaeological significance or historic value.	Yes	Scheduled Ancient Monument at Leckhampton	
7b Is the broad location within (or partly within) a Conservation Area	Yes/No	No	
8. Transport			
8a Is the broad location in, or close to, an area of high accessibility to key facilities	Yes/No	Northern periphery of site abuts the main built up area of Cheltenham. Access to a range of key services is therefore available in close proximity. The central and southern areas of the site are however increasingly remote from Cheltenham.	GREEN/AMBER
8b Is the site well connected to the transport infrastructure network, and will the location provide opportunities to support travel by non car modes.	Yes/No	Eastern periphery of site abuts the A46 Shurdington Road. Up Hatherley Way runs along the northern periphery and Chargrove lane runs through part of the site. Regular bus services operate in close proximity to the site including the No.10 between Cheltenham and Gloucester, connecting site to both centres for employment and services. Opportunities exist to support travel by non-car modes given the sites location to the South western periphery of Cheltenham. Limited access to Cheltenham railway station. Possibility of providing a Park and Ride at Shurdington to help reduce traffic congestion towards Cheltenham.	GREEN/AMBER
8c Are there any Highway Junction capacity constraints?	Yes	Congestion on the A46 corridor, with limited scope for capacity enhancements due to physical constraints on frontage development. A40 Arle Court Roundabout is a constraint to traffic movement to the North and West, with limited scope to secure significant capacity enhancements. Possible solutions/opportunities: Strengthening of the No.10 as a commercial bus service (County Council are proposing cuts to the evening and weekend service, which are currently subsidized)	
Waste and Pollution			
9a Is the site close to or within a reduced air quality area?	No	Unallocated in the Tewkesbury Local Plan	GREEN
9b Is the site close to	Yes	Inert waste recycling facility (Elliot and Sons) is located nearby. This would	GREEN

<p>an existing or planned waste processing facility?</p>		<p>be positive in terms of reducing the need to travel to recycle.</p>	
<p>10. Economy 10a Is the broad location suitable for a mix of employment opportunities?</p>	<p>No</p>	<p>Site currently not well linked to highway infrastructure for accessing M5 motorway for HGVs. Western and eastern most parts of site may be suitable for B1 employment, middle part of site not accessible. The ELR considers that 5 hectares of land at Leckhampton could be developed for office/light industrial use to meet Cheltenham's future employment land requirement</p>	<p>AMBER</p>
<p>10b Is the broad location close to a range of existing employment opportunities?</p>	<p>Yes/No</p>	<p>Existing employment opportunities at Arle Court and GCHQ to north west of site. Site 4/5km from centre of Cheltenham with a range and mix of employment opportunities.</p>	<p>AMBER</p>
<p>24 City and Town Centres Does the site have the ability to create and sustain a vibrant community? Will it support the existing town and city centre facilities or will it help unlock identified needed facilities?</p>	<p>Support Existing Yes/No</p>	<p>Unlock new Yes/No Land closest to the northern boundary of this broad location area is most peripheral to the Cheltenham urban core. Land around Leckhampton is particularly close to the city centre. Much of this broad location area, especially Eastern parts are close to a range of good community facilities, services and would be expected to have a positive contribution in regards helping to sustain a vibrant town centre. The central and southern areas of the site are however increasingly remote from Cheltenham. It should be noted that Land is allocated in the Tewkesbury Local Plan for land to the west of Farm Lane and North of Leckhampton Lane for approximately 360 units. Part of this broad location; land between Grovefield Way/Cold Pool and the Railway at Middle Farm in Badgeworth Parish has planning permission for 273 housing units.</p>	<p>GREEN/AMBER</p>
<p>12. and 13. Sustainable Communities</p>	<p>These objectives will be considered at a later stage in the SA/SEA process during the more detailed design and masterplanning stages.</p>		

14. Health			
14 Could development of the site improve access to local health facilities and improve health inequalities?	Yes/No	North eastern part of site in 20 minute walking distance of Leckhampton Surgery . Up Hatherley surgery also within 20 minute walking distance of part of the site – more work required to ascertain 20 minute walking catchment. North east and southern parts of site not within 20 minute walking distance of primary health care facilities Closest A&E at Cheltenham General Hospital some 4 km to the north east.	AMBER
15. Housing		All the sites are likely to be able to deliver some identified housing need. The tenure split, ratio of affordable to open market, size and density of housing would form part of a more detailed assessment at a later stage in the SA/SEA process.	
16. Green Space			
16a Does the location provide the opportunity for access to the countryside and natural environment?	Yes/No		
16b Does the site contain strategic open green space?	Yes/No	Good green infrastructure along the brook lines.	
16c Will it ensure existing open spaces are protected and enhanced?	Yes/No	There is existing greenspace at Leckhampton which will need to be protected, development could offer opportunities to enhance greenspace	
17. Education			
17 a Will the site allow good access to educational facilities or the ability to support existing facility or a new facility?	Yes/No	North eastern part of site in 20 minute walking distance of Leckhampton Primary School & Warden Hill Primary. Northern swathe of site in 20 minute walking distance of Warden Hill, Hatherley & Lakeside Primary Schools, more work required on 20 minute walking catchments for these schools. Parts of site in 20 minute walking distance of Bournside Secondary School however more work required to ascertain exactly how far this catchment extends into the site. Further education at Gloucestershire College campus on Hesters Way but not accessible by public transport.	AMBER

		<p>If developed along with (the southern part of) C5 consideration will need to be given to the cumulative impact upon the existing early year's / primary network. Particularly, when reviewing on-site or off-site options and / or when taking into account 'existing capacity' with the modelling (size and scale) of any new on-site provision.</p> <p>Similarly, the cumulative impact upon the existing secondary network (if developed alongside G4 and / or C5) will be an important issue as off-site provision is the most likely solution in this instance.</p> <p>Early advice on the requirements of other infrastructure services would be welcomed so as to give as much opportunity as possible to explore a more integrated / shared services solution (the development of the community hub model).</p>	
<p>18. Culture and Tourism</p>	<p>The impact on this SA objective will form part of a more detailed SA/SEA assessment later in the JCS process.</p>		<p>in the JCS</p>
<p>19. Deliverability of Site and other strategic spatial options?</p>			
<p>19a Are there any known needs for essential infrastructure?</p>		<p>Overhead powerlines bisect the middle of the southernmost section of this broad location area between Shurdington and Chargrove. This could present a constraint to development in this part of the broad location.</p> <p>The requirements for infrastructure are currently subject to initial appraisal by infrastructure providers. Encourage early and open dialogue between potential infrastructure and service providers, particularly where alternative, integrated / shared services solution may be possible. From the library service perspective examples include:- better alignment with public transport to improve accessibility and the expansion of co-location opportunities (e.g. with youth services, children's centres, Police, GP and health care, district and / or town council services, and volunteer / 3rd sector activities etc...)</p> <p>If strategic-scale development growth is taken forward in this locality (several thousand units across C5 and C6. And alternatively across C6 and / or G4 and / or G3) careful consideration will need to be given to a review of the form and status of the proposed local tiered libraries. This may also result in new (on-site) facilities and / or significant re-modelling of the existing provision.</p>	
<p>19b Will development of</p>	<p>Yes/No</p>	<p>This broad location site (C6a) is on the southern edge of the built up area</p>	

<p>the site ensure greater self containment of the urban areas?</p>		<p>of Cheltenham and therefore its development would probably ensure a greater self containment of the urban area due to its proximity to the town's facilities and services.</p>	
<p>19c Is the site within the Green Belt (summarise findings of greenbelt review).</p>	<p>Yes</p>	<p>The whole of this broad location area is within the current designated greenbelt. With the exception of two adjoining small areas at the northern boundary near the railway line, and a small parcel of land near Leckhampton. The recent Greenbelt review considered this Broad Location as four separate parcels of land (SE3,4,5 and 10). This review also considered whether there is a case for land to the south west of Leckhampton to be incorporated into the Green Belt. SE 3,4,5 and 10 – land between Cheltenham and Gloucester to the East of the M5 and south of the A40 were considered to make a significant contribution towards the purpose of the Greenbelt. These segments contribute towards the prevention of the merging of Cheltenham and Gloucester as well as preventing sprawl. Segment SE3 lying immediately southwest of Leckhampton has well defined external boundaries in the A46 to the West and Leckhampton Lane to the south and a strong landscape structure comprising pasture and remnant orchards separated by well maintained hedgerows which gives it strong coherence. However despite the bulk of this segment fulfilling greenbelt purposes (particularly in limiting ribbon development along the A46 between Warden Hill and Shurdington), the boundary of the segment with land at Leckhampton is illogical particularly given recent developments at Brizen Lane/The Lanes which intrude into this parcel of land, there is scope therefore to amend the boundary as Farm Lane would be a better defined and more logical Green Belt Boundary, rather than its current definition along a drainage ditch and hedge. Land to the southwest of Leckhampton, between Farm Lane and Kidnappers Lane, whilst being of a similar land use and open character to segment SE3, was found to not play a role in terms of maintaining the gap between Gloucester and Cheltenham which is the key purpose of the Greenbelt in this location. The area to the north/north east of Kidnapper's Lane is not identified as a separate area in the GB assessment as land to its south/south east is not considered to have a strong case for inclusion within the greenbelt.</p>	
<p>Conclusion: This large broad location area was deemed to be important for biodiversity value and therefore scored relatively highly. Overall C6a displays a good mosaic of habitat types which could make mitigation difficult, however there could be opportunities to link habitats and create wildlife corridors. If all, or parts, of this broad location area were to be taken forward for further consideration within</p>			

the JCS process a detailed environmental impact assessment would need to be undertaken to help assess the impact of various options on biodiversity. Flooding is not a constraint within this broad location area.

Land closest to the north/north eastern boundary of this broad location area is most peripheral to the Cheltenham urban core. Land around Leckhampton is particularly well connected to the urban centre. Much of this broad location area, especially Eastern parts are close to a range of good community facilities, services and would be expected to have a positive contribution in regards helping to sustain a vibrant town centre. The central and southern areas of the site are however increasingly remote from Cheltenham. Whilst the landscape sensitivity (for those areas for which evidence has been gathered in this broad location) has been considered to be moderate to high, the proximity of parts of this site to the urban centre and connectivity to transport infrastructure, and the fact that flooding is not a constraint; would indicate that this broad location area be reduced in size and three segments should be taken forward for further appraisal to enable the environmental, social and economic impacts/opportunities to be assessed, namely:

segment of land near The Reddings defined as land between the A40 to the North, Badgeworth Lane to the West and the Rail line to the South;

Segment of land South-east of the railway line around Up Hatherley on either side of Sunnfield Lane between Coldpool Lane and Chargrove Lane; and,

Land to the south-west of Leckhampton bounded to the north-west by the A46 Shurdington Road, to the West by Farm Lane, the North by Church Road and to the East by public greenspace and allotments.

County libraries info:

Encourage early and open dialogue between potential infrastructure / service providers, particularly where alternative / shared services solution may be possible. From the library service perspective examples include:- better alignment with public transport to improve accessibility and the expansion of co-location opportunities (e.g. with youth services, children's centres, Police, GP and health care, district and / or town council services, and volunteer / 3rd sector activities etc...)

If strategic-scale development growth is taken forward in this locality (several thousand units across C5 and C6. And alternatively across C6 and / or G4 and / or G3) careful consideration will need to be given to a review of the form and status of the proposed local tiered libraries. This may also result in new (on-site) facilities and / or significant re-modelling of the existing provision.

JCS Sustainability Appraisal – Broad Locations

Site Reference No. T1 Land at Mitton

Total Area of Site 272.36 ha

SA Objective/Indicator		Notes and Commentary		Performance
Biodiversity				
1a Does the broad location contain sites of biodiversity value e.g. SSSI?	No	T1a – No T1b - Rectory Farm Meadows SSSI and Upham Meadow and Summer Leasow SSSI are located to the north of this site. Both these SSSIs are in unfavourable recovering condition, with parts considered to be in favourable condition. T1c - Rectory Farm Meadows SSSI and Upham Meadow and Summer Leasow SSSI are within the site. Both these SSSIs are in unfavourable recovering condition, with parts considered to be in favourable condition.	T1a GREEN T1b RED T1c RED	
1b Is the broad location within 5km of a European Designated Site (SAC or SPA)	No	T1a – No T1b – No T1c – Yes: Bredon Hill to the north of the Broad Location.	T1a GREEN T1b GREEN T1c RED	
1c Are there designated BAP Priority Habitats on the site?	Yes	T1a – No T1b - Coastal and floodplain grazing marsh across almost the majority of the site. T1c - Coastal and floodplain grazing marsh along the western/centre parts of the site.	T1a GREEN T1b RED T1c RED	
1d Would development of the site be likely to lead to fragmentation of important habitats	Yes/No	Low ridge between 2 water courses. Generally large field size with higher land dominated by arable, lower land has more improved/semi-improved grassland. Large field structure with poor to average hedge structure and few trees. Amenity grassland around Croft Farm Water Park some good wetland habitat around lake to the immediate South of the water park. Given its potential the site actually does not deliver much in terms of biodiversity. Land is farmed intensively up to the top of bank of Avon, there is little habitat associated with the lakes or indeed Carrant brook.	T1a AMBER T1b AMBER T1c RED	

<p>1e Will development of the site offer opportunities to link important habitats/create wildlife corridors?</p>	<p>Yes/No</p>			
<p>Overall likely biodiversity impact?</p>	<p>Parts of this broad location may well benefit from development if there was associated investment in riparian and lake habitat. Worcestershire Biodiversity Action Plan identifies land within T1 as lowland agricultural landscape. T1b and T1c contain SSSIs and T1c is also within 5km of a European Site. T1a, however, seems to be generally poor in regards to biodiversity value and potentially may well benefit from development is there were to be associated investment in biodiversity habitat. A full ecological survey would need to be undertaken to ascertain the actual biodiversity quality/potential of all or part(s) of this broad location area.</p>		<p>T1a GREEN T1b AMBER T1c RED</p>	
<p>2. Climate Change Mitigation</p>	<p>For the purposes of broad location SA this objective considers renewable energy potential only. Reduction of carbon emissions through location and transport are dealt with under SA Objective 8. Design of development to reduce carbon will form part of later detailed masterplanning stage of selected broad locations.</p>			
<p>2a Does the site have any renewable energy resource potential?</p>	<p>Yes/No</p>	<p>Further information required.</p>		
<p>2b Is there large energy/heat demand potential from facilities/premises in the area that could benefit from excess heat from decentralized energy e.g. hospital/leisure centre/large manufacturer?</p>	<p>Yes/No</p>	<p>Further information required.</p>		
<p>3. Climate change Adaptation</p>	<p>This objective is not assessed as part of the broad locations SA. Flooding is considered separately and other climate change adaptation techniques will be a fundamental part of the design of individual developments rather than site specific.</p>			
<p>4. Flooding Does the broad location contain areas in Flood Zones 2, 3a or 3b? If so</p>	<p>Flood zone 2</p>	<p>Flood zone 3a</p>	<p>Flood zone 3b</p>	<p>T1a – 30% floodplain focused around the Carrant Brook, land to west of site rises towards the B4080 Bredon Road and is not subject to flooding. A portion of the land in the south east extent of this area falls within Floodzone 3b.</p> <p>AMBER</p>

<p>give approximate percentage of the site affected.</p>				<p>In terms of surface water flooding the land along the eastern edge of the broad location is largely subject to an intermediate risk.</p> <p>T1b – 80% floodplain. A wide strip of land at the western edge of this broad location falls within the functional floodplain 3b.</p> <p>In terms of surface water flooding the land along the western edge of the broad location is largely subject to an intermediate risk.</p> <p>T1c – 50% floodplain across western half of the site.</p>	<p>RED</p> <p>RED</p>
<p>5 & 6 Natural Resources</p>					
<p>5a Is the site brownfield or Greenfield (if Greenfield state approximate percentage of total area)?</p>	<p>Greenfield</p> <p>95 %</p>	<p>Predominantly Greenfield site.</p> <p>T1a – Greenfield agricultural land</p> <p>T1b – Greenfield agricultural land with large lake to north</p> <p>T1c – Greenfield but with recreational lakes and chalet, static and touring caravan/camping park</p>			
<p>5b Does the site contain any existing buildings which could be refurbished?</p>	<p>Yes/No</p>	<p>No</p>			
<p>5c Does the site contain landscape designations e.g. AONB, local designation.</p>	<p>No</p>	<p>No landscape designations discernable from Wychavon District Council Interactive Proposals Map – map just indicates flood risk zones.</p>			<p>GREEN</p>
<p>5d Overall judgement of landscape sensitivity</p>		<p>Further information required.</p>			
<p>5e Does the site contain high grade agricultural land – Grades 1,2 and 3a (if give the approximate percentage)</p>	<p>No Grade 1</p>	<p>Yes Grade 2 T1a Top NE corner 25%</p>	<p>Yes Grade 3 75%</p>	<p>The majority of the site is designated Grade 3, the north eastern area of the site designated Grade 2.</p>	<p>AMBER</p>

5f	Would development of the site help clean up contaminated land or eradicate invasive alien plants e.g. Japanese Knotweed?	Yes/No		
6a	Are there known mineral deposits? Are these viable and will they need to be extracted before development?	Yes	Sand and gravel deposits appear throughout the surrounding area. However, T1 is outside of Gloucestershire and should be reviewed by the respective minerals planning authority (Worcestershire County Council)	
6b	Are there any water supply constraints?	Yes/No	Further information required.	NOT ASSESSED
6c	Are there any Sewerage Network/Capacity constraints	Yes/No	Further information required.	NOT ASSESSED
Historic Environment				
7a	Does the site contain areas of archaeological significance or historic value.	Yes/No	Worcestershire County Council identify the archaeology of Bredon Hill and the Carrant Valley as probably the wealthiest in Worcestershire, therefore likely to be archaeological deposits within T1. Many discoveries have been associated with quarrying for sand and gravel alongside the Carrant Brook. The fertile and well-drained land has attracted local communities for a long period of time, first as gatherers and hunters, and later as farmers.	AMBER
7b	Is the broad location within (or partly within) a Conservation Area	Yes/No	T1c - Small cluster of listed buildings in Bredons Hardwick located on Bredon Road to the north of the Broad Location. No	GREEN
8. Transport				
8a	Is the broad location in, or close to, an area of high accessibility to key facilities	Yes/No	Site located to the north east of Tewkesbury town, with the southern and eastern peripheries abutting existing development. Existing roads provide access into the town centre which is located a short distance away and provides a good variety of key local services. The northern area of the site is increasingly remote from the town centre.	AMBER/RED
8b	Is the site well connected to the transport	Yes/No	This BLA is less easy to serve by bus than many other peripheral areas. Access to Ashchurch train station is not easy.	AMBER

<p>infrastructure network, and will the location provide opportunities to support travel by non car modes.</p>		<p>A new Tewkesbury Relief Road is likely to be necessary to provide strategic access to the site. This would have an added advantage of providing traffic relief to the town centre. Relatively easy walking and cycling distance to the town centre and local community services; therefore opportunity to encourage modal transport shift.</p> <p>County Info: Less easy to serve by bus, as outside natural and existing corridors. Air quality, congestion and road safety issues would restrict potential for development if the Relief Road is not provided. Access to Ashchurch Station is not easy.</p>	
<p>8c Are there any Highway Junction capacity constraints?</p>	<p>Yes/No</p>	<p>Air quality, congestion and road safety issues would restrict potential for development unless a new relief road is provided. Whilst there are LTP3 proposals for a traffic management scheme in Tewkesbury High Street and the route for Tewkesbury Relief Road linking the A438 with Bredon Road is safeguarded, modelling work will be required to test the impact on the relief road.</p>	
<p>23. Waste and Pollution</p>			
<p>9a Is the site close to or within a reduced air quality area?</p>	<p>No</p>		<p>GREEN</p>
<p>9b Is the site close to an existing or planned waste processing facility?</p>	<p>No</p>		<p>GREEN</p>
<p>10. Economy 10a Is the broad location suitable for a mix of employment opportunities?</p>	<p>Yes/No</p>	<p>T1a While this site lies in close proximity to existing Industrial Estate it is separated from it by the Carrant Brook. Access to the site by HGVs would be limited unless major infrastructure works to provide a link from Severn Drive on the industrial estate were implemented. Access to the site by light weight goods vehicles easier via B4080 Bredon Road. Existing residential development lies to south of site which may limit the type of employment uses the site would be suitable for.</p> <p>T1b – This site is not currently reasonable accessible by HGVs unless infrastructure to implement a northern relief road or other HGV access</p>	<p>AMBER/RED</p> <p>RED</p>

		provided through T1a. Site is more easily accessible by light goods vehicles.	RED
		T1c – More remote part of the site, less likely for sustainable employment opportunities.	RED
10b Is the broad location close to a range of existing employment opportunities?	Yes/No	T1a - Lies adjacent to existing Tewkesbury Business park and within 2 km of Tewkesbury Town Centre which provide a range of employment opportunities. T1b – Lies within 2km of Tewkesbury Town which provides a range of employment opportunities. T1c – Further north of Tewkesbury Business Park. No further employment opportunities within direct locality.	AMBER AMBER RED
25 City and Town Centres Does the site have the ability to create and sustain a vibrant community? Will it support the existing town and city centre facilities or will it help unlock identified needed facilities?	Support Existing Yes/No	Unlock new Yes/No T1a would be more suitable, rest of the broad location is more remote.	
12. and 13. Sustainable Communities	These objectives will be considered at a later stage in the SA/SEA process during the more detailed design and masterplanning stages.		
14. Health			
14 Could development of the site improve access to local health facilities and improve health inequalities?	Yes/No	T1a - All primary health facilities located in Tewkesbury Town some 2 km to South west of site therefore not within easy walking distance of existing GP surgery. T1b - All primary health facilities located in Tewkesbury Town some 2 km to South west of site. T1c - GP surgery in Bredon at GL20 7QN some 2 km to north east & GP & dental facilities in Tewkesbury Town 2.5/3km to south west. For whole T1 site - Closest A & E Dept in Gloucester or Cheltenham	AMBER

			Tewkesbury Hospital provides for minor injuries and day surgeries.	
15. Housing	All the sites are likely to be able to deliver some identified housing need. The tenure split, ratio of affordable to open market, size and density of housing would form part of a more detailed assessment at a later stage in the SA/SEA process.			
16. Green Space				
16a Does the location provide the opportunity for access to the countryside and natural environment?	Yes/No	Further information required.		
16b Does the site contain strategic open green space?	Yes/No	Further information required.		
16c Will it ensure existing open spaces are protected and enhanced?	Yes/No	Further information required.		
17. Education				
17 a Will the site allow good access to educational facilities or the ability to support existing facility or a new facility?	Yes/No	<p>T1a - Southern half of site in 20 minute walking distance of Mitton Manor Primary school, northern half of site not in 20 minute walking catchment of a primary school.</p> <p>Southern half of site within 1 km of Tewkesbury Secondary School as the crow flies - routes through Tewkesbury Industrial Estate – these links could be improved.</p> <p>Northern half of site not within 20 minute walk of Tewkesbury Secondary School.</p> <p>T1b- Southern half of site within 20 minute walk of Mitton Manor Primary School, however this would require crossing busy B4080 Bredon Road.</p> <p>Northern half of site not within 20 minute walk of primary school.</p> <p>Unlikely that any of site is within 20 minute walk of Tewkesbury Secondary School.</p>	<p>AMBER</p> <p>RED</p>	

		<p>T1c - Site is probably as close to Bredon Hancock Primary School as it is to Mitton Manor, neither of which would be a 20 minute walk.</p> <p>Site is not within 20 minute walk of Tewkesbury Secondary School.</p> <p>Further education for whole T1 site provided at Gloucestershire College in campuses at Cheltenham and Gloucester.</p> <p>Some adult education provision within Tewkesbury but a limited range of courses necessitating travel to the nearby urban centres of Cheltenham and Gloucester.</p> <p>If developed along with T2 and / or T6 consideration will need to be given to the cumulative impact upon the existing early year's / primary network. Particularly, when reviewing on-site or off-site options and / or when taking into account 'existing capacity' with the modelling (size and scale) of any new on-site provision.</p> <p>Similarly, the cumulative impact upon the existing secondary network (if developed alongside T2 and / or T6) will be an important issue as off-site provision is the most likely solution in this instance.</p> <p>Early advice on the requirements of other infrastructure services would be welcomed so as to give as much opportunity as possible to explore a more integrated / shared services solution (the development of the community hub model).</p>	<p>RED</p> <p>RED</p> <p>AMBER/RED</p>
<p>18. Culture and Tourism</p>	<p>The impact on this SA objective will form part of a more detailed SA/SEA assessment later in the JCS process.</p>		
<p>19. Deliverability of Site and other strategic spatial options?</p> <p>19a Are there any known needs for essential infrastructure?</p> <p>19b Will development of the site ensure greater self containment of the urban areas?</p>		<p>The requirements for infrastructure are currently subject to initial appraisal by infrastructure providers.</p>	
	<p>Yes/No</p>		

<p>19c Is the site within the Green Belt (summarise findings of greenbelt review).</p>	<p>No</p>	
<p>Conclusion:</p> <p>T1a does not have restrictive biodiversity or landscape constraints however the main constraint on this site is flooding, both along the Carrant Brook and across the southernmost sector of the site. The southern part of the site is reasonably well located adjacent to existing residential and employment development however the presence of the floodplain is a constraint to further development in this location. The need for a Tewkesbury Northern Relief Road to reduce congestion and prevent problems with air quality in Tewkesbury Town is a further constraint to bringing forward this site. The southern sector of this site is well located with regard to access to primary school and secondary school facilities (if short cut cycle/footways are used) but is not within reasonable walking distance of services and facilities in Tewkesbury Town, the site is not well served by public transport however there may be opportunities to enhance other facilities for other sustainable modes of travel. Given the proximity of the southern half of this site to existing residential and employment development and its relative proximity to Tewkesbury Town it is considered that the southern half of the site up to Mitton Lodge should be taken forward for further in depth sustainability appraisal. The northern half of the site is considered to be too remote to be sustainable and its development would result in urban sprawl northwards into open countryside.</p> <p>T1b - The majority of this site lies within the River Avon floodplain and is the site of a SSSI. Development of this site would not relate well to the existing built form of Tewkesbury as it would result in urban sprawl into open countryside to the north of the town. That part of the site which is developable land namely a thin strip adjacent to the B4080 is remote from the services and facilities found in Tewkesbury Town and the site is not well served by public transport. This site is therefore discounted as a broad location for further investigation as it does not perform well in sustainability appraisal.</p> <p>T1c – Is a northerly rural outlier with a recreational and tourist facility equidistant between Tewkesbury and the village of Bredon. The site has a SSSI and is remote from services and facilities found in either Tewkesbury or Northway/Ashchurch. The site is not well served by public transport and therefore is discounted as a broad location for further investigation as it does not perform well in sustainability appraisal. Development of this site would not relate well to the existing built form of Tewkesbury as it would result in urban sprawl into open countryside to the north of the town.</p> <p>County Libraries Info: Encourage early and open dialogue between potential infrastructure / service providers, particularly where alternative, integrated / shared services solution may be possible. From the library service perspective examples include:- better alignment with public transport to improve accessibility and the expansion of co-location opportunities (e.g. with youth services, children's centres, Police, GP and health care, district and / or town council services, and volunteer / 3rd sector activities etc...)</p> <p>If strategic-scale development growth is taken forward in this locality (several thousand units across T1 and / or T2 and / or T6) careful consideration will need to be given to a review of the form and status of the proposed local tiered libraries. This may also result in new (on-site) facilities and / or significant re-modelling of the existing provision</p>		

JCS Sustainability Appraisal – Broad Locations

Site Reference No. T2 Land at Ashchurch/Northway

Total Area of Site 198.52 ha

SA Objective/Indicator	Notes and Commentary	Performance
10. Biodiversity		
1a Does the broad location contain sites of biodiversity value e.g. SSSI?	No	GREEN
1b Is the broad location within 5km of a European Designated Site (SAC or SPA)	T2a - Dixon Wood (approx 5km from southern boundary) T2b – Bredon Hill, North of the Broad Location (Approx 5km).	T2a GREEN T2b RED
1c Are there designated BAP Priority Habitats on the site?	No	
1d Would development of the site be likely to lead to fragmentation of important habitats	Yes/No	GREEN
	<p>T2a - Dominated by St Barbara Barracks and Depot. Significant hard standing with very little vegetation. Limited tree cover and some gang mown grassland to the West of the site. Generally very little potential.</p> <p>T2b - Agricultural land east of railway South of C road generally arable with some improved grassland and equine related activity. Small amount improved grassland with ridge and furrow in Eastern corner. Visually dominant poplar plantation to immediate North of Depot probably planted as quickly growing visual screen. Hedgerow structure poor to average. Little tree cover.</p> <p>North of C road Semi improved grassland dominates with good to very good ridge and furrow. Good hedge structure with hedge trees and isolated orchard trees. Useful riparian strip adjacent to the brook dominated by willow.</p> <p>Triangle of land to West of railway mix of semi-improved and arable. Some good hedge and hedge trees. Wide riparian strip to North with rough grassland, wetland, scrub and woodland.</p> <p>Worcestershire Biodiversity Action Plan identifies land to the north of T2b as lowland agricultural landscape.</p>	AMBER

<p>1e Will development of the site offer opportunities to link important habitats/create wildlife corridors?</p>	<p>Yes/No</p>	<p>Further information required.</p>							
<p>Overall likely biodiversity impact?</p>	<p>Land to North of C road and West of railway Medium low/Value. South of C road low.</p>		<p>T2a GREEN/AMBER T2b GREEN</p>						
<p>2. Climate Change Mitigation</p>	<p>For the purposes of broad location SA this objective considers renewable energy potential only. Reduction of carbon emissions through location and transport are dealt with under SA Objective 8. Design of development to reduce carbon will form part of later detailed masterplanning stage of selected broad locations.</p>								
<p>2a Does the site have any renewable energy resource potential?</p>	<p>Yes/No</p>	<p>Further information required.</p>							
<p>2b Is there large energy/heat demand potential from facilities/premises in the area that could benefit from excess heat from decentralized energy e.g. hospital/leisure centre/large manufacturer?</p>	<p>Yes/No</p>	<p>Further information required.</p>							
<p>3. Climate change Adaptation</p>	<p>This objective is not assessed as part of the broad locations SA. Flooding is considered separately and other climate change adaptation techniques will be a fundamental part of the design of individual developments rather than site specific.</p>								
<p>4. Flooding Does the broad location contain areas in Flood Zones 2, 3a or 3b? If so give approximate percentage of the site affected.</p>	<table border="1"> <tr> <td data-bbox="1321 1485 1401 1691"> <p>Flood zone 2</p> </td> <td data-bbox="1321 1350 1401 1485"> <p>Flood zone 3a</p> </td> <td data-bbox="1321 1216 1401 1350"> <p>Flood zone 3b</p> </td> </tr> <tr> <td data-bbox="1321 1350 1401 1485"> <p>Yes</p> </td> <td data-bbox="1321 1350 1401 1485"> <p>No</p> </td> <td data-bbox="1321 1350 1401 1485"> <p>Yes</p> </td> </tr> </table>	<p>Flood zone 2</p>	<p>Flood zone 3a</p>	<p>Flood zone 3b</p>	<p>Yes</p>	<p>No</p>	<p>Yes</p>	<p>T2a – No floodplain T2b - Northern boundary of the Broad Location consists of the main river centreline with flood zones 2 and 3b. 30% of site.</p>	<p>GREEN AMBER</p>
<p>Flood zone 2</p>	<p>Flood zone 3a</p>	<p>Flood zone 3b</p>							
<p>Yes</p>	<p>No</p>	<p>Yes</p>							
<p>5 & 6 Natural Resources</p>									
<p>5a Is the site brownfield or Greenfield (if Greenfield state approximate</p>	<table border="1"> <tr> <td data-bbox="1471 1485 1572 1691"> <p>Greenfield</p> </td> <td data-bbox="1471 1350 1572 1485"> <p>T2a – 100% brown field, former MOD logistics/storage/warehousing centre</p> </td> </tr> <tr> <td data-bbox="1471 1350 1572 1485"> <p>60 %</p> </td> <td data-bbox="1471 1350 1572 1485"> <p>T2b – 100% Greenfield except for small cluster of dwellings at Aston Fields</p> </td> </tr> </table>	<p>Greenfield</p>	<p>T2a – 100% brown field, former MOD logistics/storage/warehousing centre</p>	<p>60 %</p>	<p>T2b – 100% Greenfield except for small cluster of dwellings at Aston Fields</p>		<p>GREEN</p>		
<p>Greenfield</p>	<p>T2a – 100% brown field, former MOD logistics/storage/warehousing centre</p>								
<p>60 %</p>	<p>T2b – 100% Greenfield except for small cluster of dwellings at Aston Fields</p>								

percentage of total area)?			Farm	
5b Does the site contain any existing buildings which could be refurbished?	No		MOD site is predominantly older style warehousing – possibility of presence of asbestos in roof sheeting of warehouses, no scope for conversion of these buildings for residential purposes.	RED
5c Does the site contain landscape designations e.g. AONB, local designation.	Yes/No		T2a - Protected potential freight railhead in T2a plus important open space fronting A46 in T2a, but no landscape designations. T2b - No	GREEN
5d Overall judgement of landscape sensitivity			The existing land use is generally divided into two areas, the MOD built form to south and the open arable fields to the north. The field pattern to the north is open, flat and generally very low in amenity, historic and ecological value. However, if this northern area were to be developed the visual impact would be adverse due to the existing pattern and alignment of the neighbouring built form of Northway. Visually it would be seen as a protrusion into the open countryside. The redevelopment of the MOD site could be a positive contribution to the landscape if designed sympathetically with the wider environment and field pattern."	GREEN
5e Does the site contain high grade agricultural land – Grades 1,2 and 3a (if give the approximate percentage)	Yes/No Grade 1 No		Yes/No Grade 2 No Yes/No Grade 3 100%	
5f Would development of the site help clean up contaminated land or eradicate invasive alien plants e.g. Japanese Knotweed?	Yes/No		Further information required.	
6a Are there known mineral deposits? Are these viable and will they need to be extracted before development?	Yes/No		Further information required.	
6b Are there any water supply constraints?	Yes/No		Further information required.	

6c Are there any Sewerage Network/Capacity constraints	Yes/No	Further information required.	
Historic Environment			
7a Does the site contain areas of archaeological significance or historic value.	No	Worcestershire County Council identify the archaeology of Bredon Hill and the Carrant Valley as probably the wealthiest in Worcestershire, therefore likely to be archaeological deposits within T2b. Many discoveries have been associated with quarrying for sand and gravel alongside the Carrant Brook. The fertile and well-drained land has attracted local communities for a long period of time, first as gatherers and hunters, and later as farmers.	RED
7b Is the broad location within (or partly within) a Conservation Area	No	The broad location is not located within a conservation area.	GREEN
8. Transport			
8a Is the broad location in, or close to, an area of high accessibility to key facilities	Yes/No	Western boundary of the site abuts the periphery of the main built up area of Tewkesbury with some road and good bus links into the town centre and on to Cheltenham (routes 41 and 42 through Northway every 15 minutes) The A46 Cheltenham Road runs to the southern boundary of the site. However, the site is increasingly remote from the town centre and there would be limited opportunity for walking to access key services.	GREEN/AMBER
8b Is the site well connected to the transport infrastructure network, and will the location provide opportunities to support travel by non car modes.	Yes/No	Small scale services are available to access at Northway to the west. Permeability is also an issue, with the M5 motorway to the west of the site, beyond Northway. County Info: Housing would go against rail freight facility proposal unless land protected in the JCS. Capacity at M5 J9 limited – development would erode the impact of the recent improvement scheme. Severance impact of the A46 / M5 and the railway would restrict walk / cycle opportunities to Tewkesbury. Remote from town centre – especially for walking journeys. Not easy to serve commercially by public transport – too far from the natural corridors. Area of site to the West of the railway might be easier to develop as	AMBER/RED

			extension of existing housing. Area to the East would be landlocked if the MOD site remains operational.	
8c Are there any Highway Junction capacity constraints?	Yes/No		Further information required.	
24. Waste and Pollution				
9a Is the site close to or within a reduced air quality area?	Yes/No	No.		GREEN
9b Is the site close to an existing or planned waste processing facility?	No			GREEN
10. Economy 10a Is the broad location suitable for a mix of employment opportunities?	Yes		T2a - The site is located close to the A46 trunk road with good access to the M5 for larger HGV vehicles. Existing uses in this locality would be compatible with a mixed employment site.	GREEN
10b Is the broad location close to a range of existing employment opportunities?	Yes		T2b – Existing not accessible but possibility to improve. Yes – Tewkesbury Business Park and services associated with the town centre are close to both T2a and T2b.	GREEN/AMBER GREEN
26 City and Town Centres Does the site have the ability to create and sustain a vibrant community? Will it support the existing town and city centre facilities or will it help unlock identified needed facilities?	Support Existing Yes/No	Unlock new Yes/No	In order to bring forward a sustainable community on this site it will be necessary to provide substantial investment in community infrastructure including a community centre, and primary healthcare. It will also be necessary to provide a local/district centre owing to the distance of this site from Tewkesbury Town centre. Such facilities would help Ashchurch/Northway become more sustainable. Any new development at this site would help support existing facilities and services provided in Tewkesbury Town by bringing more population to the immediate area.	GREEN/AMBER
12. and 13. Sustainable Communities	These objectives will be considered at a later stage in the SA/SEA process during the more detailed design and masterplanning stages.			
14. Health				
14 Could development of	Yes/No	T2a - GP surgery in Bredon at GL20 7QN some 3.5 km to north.		RED

<p>the site improve access to local health facilities and improve health inequalities?</p>		<p>GP & dental facilities in Tewkesbury Town 3.5km to west. T2b - GP surgery in Bredon at GL20 7QN some 2.5/3 km to north. GP & dental facilities in Tewkesbury Town 4 km to west. Closest A & E Dept in Gloucester or Cheltenham Tewkesbury Hospital provides for minor injuries and day surgeries.</p>	
<p>15. Housing</p>	<p>All the sites are likely to be able to deliver some identified housing need. The tenure split, ratio of affordable to open market, size and density of housing would form part of a more detailed assessment at a later stage in the SA/SEA process.</p>		<p>The tenure split, ratio of affordable to open market, size and density of housing would form part of a more detailed assessment at a later stage in the SA/SEA process.</p>
<p>16. Green Space</p>			
<p>16a Does the location provide the opportunity for access to the countryside and natural environment?</p>	<p>Yes/No</p>		
<p>16b Does the site contain strategic open green space?</p>	<p>Yes</p>	<p>Safeguarded important open space fronting A46 in T2a. SEE TBLP</p>	<p>AMBER</p>
<p>16c Will it ensure existing open spaces are protected and enhanced?</p>	<p>Yes/No</p>		
<p>17. Education</p>			
<p>17 a Will the site allow good access to educational facilities or the ability to support existing facility or a new facility?</p>	<p>Yes/No</p>	<p>T2a - Site lies to north east of Ashchurch Primary School and only extreme east of site would not be within a 20 minute walk of this primary school. However, it would be necessary to cross the main A46 Tewkesbury to Evesham Road to access the primary school from the site. Site not within 20 minute walk of Tewkesbury Secondary School. T2b - The western half of this site lies within a 20 minute walk of both Northway Infants and Carrant Brook Junior School in Northway however the site is subdivided by the railway which is currently traversed by a level crossing. The eastern half of the site lies over 1km from these primary</p>	<p>AMBER GREEN/AMBER</p>

		<p>schools.</p> <p>The southern part of the site is within 1km of Ashchurch primary school. To access this school children would need to cross the main A46 Tewkesbury to Evesham Road but would not need to cross the railway.</p> <p>The site is not within 20 minute walk of Tewkesbury Secondary School.</p> <p>Further education provided at Gloucestershire College on campuses in Cheltenham & Gloucester.</p> <p>Limited adult education provision in Tewkesbury.</p> <p>County Info: If developed along with T1 and / or T6 consideration will need to be given to the cumulative impact upon the existing early year's / primary network. Particularly, when reviewing on-site or off-site options and / or when taking into account 'existing capacity' with the modelling (size and scale) of any new on-site provision.</p> <p>Similarly, the cumulative impact upon the existing secondary network (if developed alongside T1 and / or T6) will be an important issue as off-site provision is the most likely solution in this instance.</p> <p>Early advice on the requirements of other infrastructure services would be welcomed so as to give as much opportunity as possible to explore a more integrated / shared services solution (the development of the community hub model).</p>	<p>RED</p> <p>RED/AMBER</p>
18. Culture and Tourism	The impact on this SA objective will form part of a more detailed SA/SEA assessment later in the JCS process.		
19. Deliverability of Site and other strategic spatial options?			
19a Are there any known needs for essential infrastructure?		The requirements for infrastructure are currently subject to initial appraisal by infrastructure providers.	
19b Will development of the site ensure greater self containment of the urban	Yes/No		

<p>areas? 19d Is the site within the Green Belt (summarise findings of greenbelt review).</p>	<p>No</p>	
<p>Conclusion: T2a - This site is not affected by flooding and has low biodiversity value. It is a large brown field site situated 3.5/4km distant from Tewkesbury town centre which provides a range of facilities and services including primary health care and a large supermarket. The site is located adjacent to Ashchurch for Tewkesbury Railway Station and adjacent to Ashchurch Industrial Estate employment area. The site has good access to the M5 motorway.</p> <p>Redevelopment of this site would involve costs associated with decontaminating the site which has a railway, many hectares of hard surfacing and possible sources of asbestos. Any sustainable redevelopment of this site will need to provide a range of community infrastructure including primary healthcare as well as a district/local centre. Redevelopment of the site would provide opportunities to enhance biodiversity and the landscape of the site.</p> <p>Owing to its brown field status and lack of biodiversity, despite its distance from Tewkesbury Town, it is considered that this broad location should be taken forward for further consideration with a more detailed sustainability appraisal to ascertain its suitability for redevelopment.</p> <p>T2b – The northern part of this site is subject to flooding associated with the Carrant Brook and the biodiversity value of the riparian edge is high. The archaeological significance of land adjacent to the Carrant Brook is high with many archaeological finds to the north within Worcestershire, such in situ archaeology may well be mirrored on land to the south of the Carrant Brook within this broad location. The north western sector of this site to the west of the railway would provide a natural extension to Northway in close proximity to primary school facilities. The area to the east of the railway is more isolated but still performs reasonably well as a green field site in close proximity to primary education and in close proximity to Ashchurch Industrial Estate employment area. Development of this site would benefit from any community and highway infrastructure that might be provided at T2a however T2b would integrate more easily into existing development and community facilities at Northway than any new development at T2a.</p> <p>Owing to its proximity to existing residential, employment and community facilities at Northway and accepting that the northern part of the site lies within the floodplain, and has biodiversity and archaeological constraints, it is considered that this site should be taken forward for further consideration with a more detailed sustainability appraisal to ascertain its suitability for redevelopment.</p> <p>County Libraries Info: Encourage early and open dialogue between potential infrastructure / service providers, particularly where alternative, integrated / shared services solution may be possible. From the library service perspective examples include:- better alignment with public transport to improve accessibility and the expansion of co-location opportunities (e.g. with youth services, children's centres, Police, GP and health care, district and / or town council services, and volunteer / 3rd sector activities etc...)</p>		

If strategic-scale development growth is taken forward in this locality (several thousand units across T1 and / or T2 and / or T6) careful consideration will need to be given to a review of the form and status of the proposed local tiered libraries. This may also result in new (on-site) facilities and / or significant re-modelling of the existing provision.

JCS Sustainability Appraisal – Broad Locations

Site Reference No. T3 Land South of Ashchurch including Fiddington

Total Area of Site 238.30 ha

SA Objective/Indicator	Notes and Commentary		Performance
Biodiversity			
1a Does the broad location contain sites of biodiversity value e.g. SSSI?	No	T3a – No T3b - No	GREEN
1b Is the broad location within 5km of a European Designated Site (SAC or SPA)	No	T3a – No T3b - No	GREEN
1c Are there designated BAP Priority Habitats on the site?	No	T3a – No T3b - No	GREEN
1d Would development of the site be likely to lead to fragmentation of important habitats	Yes/No	Large field pattern – predominantly arable with small areas of semi-improved grassland with ridge and furrow. Tirlle brook runs through the north of the site but has little interest being intensively farmed to brook bank. Hedges generally poor. Scattered tree cover with some boundary trees small semi-mature mixed broadleaf woodland near to motorway. Some interest around farmsteads with traces of remnant orchard and less intensive management.	AMBER
1e Will development of the site offer opportunities to link important habitats/create wildlife corridors?	Yes/No	Connectivity to other habitats hampered by Motorway to the West, MOD Depot to the north and to a lesser degree railway to the east. Minor GI potential of brook could be exploited.	AMBER
Overall likely biodiversity impact?	Potentially low value, however this is low lying open countryside and further information is required.		GREEN/AMBER
2. Climate Change Mitigation	For the purposes of broad location SA this objective considers renewable energy potential only. Reduction of carbon emissions through location and transport are dealt with under SA Objective 8. Design of development to reduce carbon will form part of later detailed masterplanning stage of selected broad locations.		
2a Does the site have any	Yes/No		

renewable energy resource potential?						
2b Is there large energy/heat demand potential from facilities/premises in the area that could benefit from excess heat from decentralized energy e.g. hospital/leisure centre/large manufacturer?	Yes/No					
3. Climate change Adaptation	This objective is not assessed as part of the broad locations SA. Flooding is considered separately and other climate change adaptation techniques will be a fundamental part of the design of individual developments rather than site specific.					
4. Flooding Does the broad location contain areas in Flood Zones 2, 3a or 3b? If so give approximate percentage of the site affected.	Flood zone 2	Flood zone 3a	Flood zone 3b			AMBER
	Yes 15%		Yes 15%		T3a – 25% of this area is identified as lying within flood zone associated with the Tirlle Brook. This runs along the northern boundary of the site from the main river centreline. T3b – 15% of this area is identified as floodplain. The route and extent of flood flow isolates the south western quadrant of T3b from the rest of the site.	
5 & 6 Natural Resources						
5a Is the site brownfield or Greenfield (if Greenfield state approximate percentage of total area)?	Greenfield					
	95 %				Site is Predominantly Greenfield in agricultural use.. There are scattering of residential properties across the site and collections of buildings at Homedowns Farm and Fiddington House Farm.	
5b Does the site contain any existing buildings which could be refurbished?	No				Only substantial agricultural buildings that would be worthy of retention and conversion	
5c Does the site contain landscape designations e.g. AONB, local designation.	Yes/No				No local landscape designations across T3.	GREEN
5d Overall judgement of landscape sensitivity					Further information required.	

5e Does the site contain high grade agricultural land – Grades 1,2 and 3a (if give the approximate percentage)	Yes/No Grade 1 No	Yes/No Grade 2 No	Yes/No Grade 3 90%	The northern extremity of the site is classified as grade 4	
5f Would development of the site help clean up contaminated land or eradicate invasive alien plants e.g. Japanese Knotweed?	Yes/No	Further information required.			
6a Are there known mineral deposits? Are these viable and will they need to be extracted before development?	Yes/No	Further information required.			
6b Are there any water supply constraints?	Yes/No	Further information required.			
6c Are there any Sewerage Network/Capacity constraints	Yes/No	Further information required.			
Historic Environment					
7a Does the site contain areas of archaeological significance or historic value.	Yes/No	There are no listed buildings which are within the Broad Location.			
7b Is the broad location within (or partly within) a Conservation Area	Yes/No	No			
8. Transport					
8a Is the broad location in, or close to, an area of high accessibility to key facilities	Yes/No	Northern boundary of the site abuts employment development with the Northway development beyond. The southern part of the site is increasingly remote from the town centre.			AMBER/RED
8b Is the site well connected to the transport infrastructure network, and	Yes/No	There are some road and bus links into the town centre, with the A46 running along the northern periphery, which provides access to key services. However, there are limited opportunities for pedestrian access to			AMBER/RED

will the location provide opportunities to support travel by non car modes.			these facilities. Permeability is an issue, with the M5 motorway running along the western edge and the railway line the eastern edge.	
8c Are there any Highway Junction capacity constraints?	Yes/No			
25. Waste and Pollution				
9a Is the site close to or within a reduced air quality area?	Yes/No		Unallocated in the Tewkesbury Borough Local Plan	GREEN
9b Is the site close to an existing or planned waste processing facility?	Yes/No			
10. Economy 10a Is the broad location suitable for a mix of employment opportunities?	Yes/No		T3a – The site is close to the M5 motorway and could possibly be a good opportunity for mixed use employment. However, residential properties are located in settlements within the broad location and their amenity should be considered with regards to noise created from employment/traffic uses.	GREEN
			T3b – This part of the site is more remote than the rest of the site. Therefore it would be less likely the site would be suitable for mixed use employment.	AMBER
10b Is the broad location close to a range of existing employment opportunities?	Yes/No		T3a – Is located opposite the A46 from Ashchurch Industrial estate and across the motorway from Tewkesbury Business Park. T3a also hosts Homedowns Farm which is rural business centre.	GREEN
27 City and Town Centres Does the site have the ability to create and sustain a vibrant community? Will it support the existing town and city centre facilities or will it help	Support Existing Yes/No		T3b – Lies further from the areas of employment identified in T3a above. No, the presence of an extensive flood zone to north of site along the Tirlle Brook which would effectively result in any new development being segregated from the existing built up area forming stand alone development in the open countryside. The further south any new development were located in the site the more remote it would become from existing services, facilities and public transport, Therefore this site is not considered to have the ability to help sustain a vibrant community.	AMBER RED

unlock identified needed facilities?				
12. and 13. Sustainable Communities	These objectives will be considered at a later stage in the SA/SEA process during the more detailed design and masterplanning stages.			
14. Health				AMBER
14 Could development of the site improve access to local health facilities and improve health inequalities?	Yes/No	T3a - GP & dental facilities in Tewkesbury Town 2.5 km to west. T3b - GP & dental facilities in Tewkesbury Town 2.5 km to west. Closest A & E Dept in Gloucester or Cheltenham Tewkesbury Hospital provides for minor injuries and day surgeries.		
15. Housing	All the sites are likely to be able to deliver some identified housing need. The tenure split, ratio of affordable to open market, size and density of housing would form part of a more detailed assessment at a later stage in the SA/SEA process.			
16. Green Space				
16a Does the location provide the opportunity for access to the countryside and natural environment?	Yes/No			
16b Does the site contain strategic open green space?	Yes/No			
16c Will it ensure existing open spaces are protected and enhanced?	Yes/No			
17. Education				GREEN/AMBER
17 a Will the site allow good access to educational facilities or the ability to support existing facility or a new facility?	Yes/No	T3a - North west of site within 20 minute walk of Tirlebrook Primary on A438 however site is subdivided from school by Junction 9 of M5. North east of site within 20 minute walk of Ashchurch primary accessed via main A46 trunk road to Evesham. Southernmost sector of site not likely to be within a 20 minute walking distance of a primary school.		

		<p>North western sector within 20 minutes walk of Tewkesbury Secondary School on A438 however site is subdivided from school by Junction 9 of M5. Rest of site not within 20 minute walk of Tewkesbury School and site subdivided from school by M5 motorway.</p> <p>T3b - Site not within a 20 minute walk of a primary or secondary school.</p> <p>Further education provided at Gloucestershire College on campuses in Cheltenham & Gloucester.</p> <p>Limited adult education provision in Tewkesbury.</p>	<p>RED</p> <p>RED</p> <p>RED</p>
18. Culture and Tourism	The impact on this SA objective will form part of a more detailed SA/SEA assessment later in the JCS process.		
19. Deliverability of Site and other strategic spatial options?			
19a Are there any known needs for essential infrastructure?		The requirements for infrastructure are currently subject to initial appraisal by infrastructure providers.	
19b Will development of the site ensure greater self containment of the urban areas?	Yes/No		
19c Is the site within the Green Belt (summarise findings of greenbelt review).	No		
<p>Conclusion:</p> <p>The north of T3a is well connected to highway infrastructure via A46 and M5 Junction 9, however this part of the site also suffers from flooding which has quite an impact in the developable area of the site. Site is not subject to any landscape or biodiversity designations. However, that does not mean to say it has no biodiversity value, if the site were to be taken forward for further analysis its would need a detailed biodiversity and landscape assessment. It is close to sources of employment however it is remote from services and facilities provided in Tewkesbury town centre. Access from the north of the site to Ashchurch primary school is good however access to secondary school is truncated by M5 motorway. The further south you travel through T3a the more removed from services and facilities you become. Public transport to Tewkesbury and Northway (and on to Cheltenham & Gloucester) is provided via A46 corridor. The close proximity of the M5 may cause problems re: noise pollution should any new development be located close to the motorway.</p>			

It is considered that this site should be discounted as a broad location and should not be taken forward owing to the presence of an extensive flood zone to north of site along the Tirlle Brook which would effectively result in any new development being segregated from the existing built up area forming stand alone development in the open countryside. The further south any new development were located in the site the more remote it would become from existing services, facilities and public transport.

T3b is far more remote from all services and facilities and is bounded to west by M5 motorway and to the east by mainline railway, the site is not served by public transport and is truncated by flooding. Site is not subject to any landscape or biodiversity designations. However, that does not mean to say it has no biodiversity value, if the site were to be taken forward for further analysis its would need a detailed biodiversity and landscape assessment, however it is discounted as a broad location and should not be taken forward because of its remoteness from existing services and facilities and the lack of access to public transport or ease of use of walking or cycling owing to its distance from the existing settlements of Tewkesbury of Northway.

JCS Sustainability Appraisal – Broad Locations

Site Reference No. T4 Land to the South East of Tewkesbury including Walton Cardiff Total Area of Site 224ha

SA Objective/Indicator	Notes and Commentary	Performance
11. Biodiversity		
1a Does the broad location contain sites of biodiversity value e.g. SSSI?	No	GREEN
	T4a - No T4b – No T4c – No T4d - No	
1b Is the broad location within 5km of a European Designated Site (SAC or SPA)	No	GREEN
	T4a – No T4b – No T4c – No T4d – No	
1c Are there designated BAP Priority Habitats on the site?	Yes/No	RED RED ?? ??
	T4a - Coastal and floodplain grazing marsh across the entire site. T4b - Coastal and floodplain grazing marsh across the entire site. T4c - Coastal and floodplain grazing marsh along the western part of the site. T4d - Coastal and floodplain grazing marsh predominantly to the north of the site.	
1d Would development of the site be likely to lead to fragmentation of important habitats	Yes/No	??
	Area to North West generally small field pattern semi improved/improved grassland with some arable. Good hedgerow structure and many good boundary trees and standards. Areas around farmsteads often have good orchards and other more diverse habitats. Adjacent M5 and to the south of the site, far bigger field pattern poor hedgerow and very little tree cover.	
1e Will development of the site offer opportunities to	Yes/No	??
	Generally poor connectivity to like habitats with development to North and west and M5 to south	

link important habitats/create wildlife corridors?	Potential GI links to West through priors park. Good GI asset of floodplain landscape.		
Overall likely biodiversity impact?	Medium Low		
2. Climate Change Mitigation	For the purposes of broad location SA this objective considers renewable energy potential only. Reduction of carbon emissions through location and transport are dealt with under SA Objective 8. Design of development to reduce carbon will form part of later detailed masterplanning stage of selected broad locations.		
2a Does the site have any renewable energy resource potential?	Yes/No	Further information required.	
2b Is there large energy/heat demand facilities/premises in the area that could benefit from excess heat from decentralized energy e.g. hospital/leisure centre/large manufacturer?	Yes/No	Further information required.	
3. Climate change Adaptation	This objective is not assessed as part of the broad locations SA. Flooding is considered separately and other climate change adaptation techniques will be a fundamental part of the design of individual developments rather than site specific.		
4. Flooding Does the broad location contain areas in Flood Zones 2, 3a or 3b? If so give approximate percentage of the site affected.	Flood zone 2	Flood zone 3a	Flood zone 3b
	Yes 90%		Yes 90%
	90% of this site lies within flood zone , only 10% is possibly developable.		
	T4a - Flood zones 2 and 3b located across the entire site. T4b - Flood zones 2 and 3b located across the entire site. T4c - Main river centreline and flood zones 3b and 3a along the northern boundary. flood zone 2 throughout the remainder of the site. T4d - Flood zones 3b and 3a predominantly north of the site tapering towards the south through the middle of the site.		
			RED RED RED RED

5 & 6 Natural Resources				
5a Is the site brownfield or Greenfield (if Greenfield state approximate percentage of total area)?	Greenfield 95 %	Predominantly Greenfield except for cluster of buildings in the hamlet of Walton Cardiff in T4c and Chapel Farm in T4d.		
5b Does the site contain any existing buildings which could be refurbished?	Yes/No			
5c Does the site contain landscape designations e.g. AONB, local designation.	Yes/No	T4c to west of Walton Cardiff Farm is a key wildlife site identified on TBLP proposals map.		
5d Overall judgement of landscape sensitivity		Further information required.		
5e Does the site contain high grade agricultural land – Grades 1,2 and 3a (if give the approximate percentage)	Yes/No Grade 1 No	Yes/No Grade 2 No	Yes/No Grade 3 90%	A parcel of grade 4 land traverses the middle of the site
5f Would development of the site help clean up contaminated land or eradicate invasive alien plants e.g. Japanese Knotweed?	Yes/No			
6a Are there known mineral deposits? Are these viable and will they need to be extracted before development?	Yes/No	Further information required.		
6b Are there any water supply constraints?	Yes/No	Further information required.		
6c Are there any Sewerage Network/Capacity constraints	Yes/No	Further information required.		

13 Historic Environment			
7a Does the site contain areas of archaeological significance or historic value.	Yes/No	There are no listed buildings within the Broad Location. Two Scheduled Ancient Monuments to south of Walton Cardiff hamlet within the flood zone and identified on TBLP proposals map. One in very north of T4d and 1 adjacent on eastern boundary of T4b. No	
7b Is the broad location within (or partly within) a Conservation Area	Yes/No		
8. Transport			
8a Is the broad location in, or close to, an area of high accessibility to key facilities	Yes/No	Northern and western area of the site about existing residential development and are located in fairly close proximity to the town centre where many key services can be accessed. However, the southern area of the site is increasingly remote from the town centre.	T4a GREEN T4b GREEN T4c RED T4d RED
8b Is the site well connected to the transport infrastructure network, and will the location provide opportunities to support travel by non car modes.	Yes/No	T4a and b are both close to the trunk roads and the M5 motorway. T4c and d whilst adjacent to the M5 motorway has no direct connection to a junction or trunk road. Due to accessibility problems this part of the site performs poorly against this objective.	T4a GREEN T4b GREEN T4c RED T4d RED
8c Are there any Highway Junction capacity constraints?	Yes/No		
26. Waste and Pollution			
9a Is the site close to or within a reduced air quality area?	No	Unallocated within the Tewkesbury Borough Local Plan	GREEN
9b Is the site close to an existing or planned waste processing facility?	No		
10. Economy	Yes/No	T4a – Close to Tewkesbury Business Park and large supermarket. Close	GREEN

<p>10a Is the broad location suitable for a mix of employment opportunities?</p>		<p>to a trunk road and the M5 motorway. Mixed use employment could be supported in this location.</p> <p>T4b – Located between residential housing estates. Mixed use employment could be harmful to amenity of residential properties. B1 use could be a possibility. Site is close to trunk roads and the M5 motorway.</p> <p>T4c – Located on the outer boundary of Walton Cardiff. Adjacent to the M5 motorway, although no direct connection to a motorway junction or trunk road. Due to accessibility problems, mixed use employment could cause traffic issues in this area.</p> <p>T4d – Located on the outer boundary of Walton Cardiff. Close to the M5 although no trunk road access to the motorway. Access for mixed use is restrictive.</p>	<p>AMBER</p> <p>RED</p> <p>RED</p>
<p>10b Is the broad location close to a range of existing employment opportunities?</p>	<p>Yes/No</p>	<p>T4a – Yes, in walking distance of town centre and business parks on the periphery of the borough.</p> <p>T4b – Yes, northern half of this site is close to Tewkesbury town centre and business parks.</p> <p>T4c – This site is close to business parks as the crow flies but they are not easily accessible via the existing highway network.</p>	<p>GREEN</p> <p>GREEN</p> <p>AMBER</p>
<p>28 City and Town Centres Does the site have the ability to create and sustain a vibrant community? Will it support the existing town and city centre facilities or will it help unlock identified needed facilities?</p>	<p>Support Existing Yes/No</p>	<p>T4d - No</p> <p>Unlock new Yes/No</p>	<p>RED</p>
<p>12. and 13. Sustainable</p>		<p>These objectives will be considered at a later stage in the SA/SEA process during the more detailed design and masterplanning stages.</p>	

Communities			
14. Health			
14 Could development of the site improve access to local health facilities and improve health inequalities?	Yes/No	T4a - GP & dental facilities in Tewkesbury Town 1 km to south west. T4b - GP & dental facilities in Tewkesbury Town 1 km to west. T4c - GP & dental facilities in Tewkesbury Town 1.5/2 km to west. T4d - GP & dental facilities in Tewkesbury Town 2/2.5km km to north west. Closest A & E Dept in Gloucester or Cheltenham Tewkesbury Hospital provides for minor injuries and day surgeries.	AMBER
15. Housing		All the sites are likely to be able to deliver some identified housing need. The tenure split, ratio of affordable to open market, size and density of housing would form part of a more detailed assessment at a later stage in the SA/SEA process.	
16. Green Space			
16a Does the location provide the opportunity for access to the countryside and natural environment?	Yes/No	Further information required.	
16b Does the site contain strategic open green space?	No	Further information required.	
16c Will it ensure existing open spaces are protected and enhanced?	Yes/No	Further information required.	
17. Education			
17 a Will the site allow good access to educational facilities or the ability to support existing facility or a new facility?	Yes/No	T4a - This site lies within a 20 minute walk of Mitton Manor primary and Tewkesbury C of E Primary School. It also lies within a 20 minute walk of Tewkesbury Secondary School. T4b - Northern part of site is within 20 minute walk of Tewkesbury C of E Primary School.	GREEN GREEN/AMBER

		<p>Southern part of site may possibly lie within 20 minute walk of John Moore Primary School on Wheatpieces.</p> <p>Northern part of site is within a 20 minute walk of Tewkesbury Secondary School.</p> <p>T4c - Northern part of site within 20 minute walk of Tirlbrook Primary and of Tewkesbury Secondary school, southern part of site more remote.</p> <p>T4d - Western part of site within 20 minute walking distance of John Moore Primary at Wheatpieces however rest of site not really within a 20 minute walking distance of a primary school.</p> <p>Site not within 20 minute walking distance of Tewkesbury Secondary School.</p> <p>Further education provided at Gloucestershire College in Gloucester and Cheltenham.</p> <p>Some limited adult education provided in Tewkesbury however most provision is located in Gloucester and Cheltenham.</p>	<p>GREEN</p> <p>RED</p> <p>RED</p> <p>RED</p>
		The impact on this SA objective will form part of a more detailed SA/SEA assessment later in the JCS process.	
18. Culture and Tourism			
19. Deliverability of Site and other strategic spatial options?			
19a Are there any known needs for essential infrastructure?		Further information required.	
19b Will development of the site ensure greater self containment of the urban areas?	Yes/No		
19c Is the site within the Green Belt (summarise findings of greenbelt review).	No	No	

Conclusion: Owing to the amount of floodplain within this site, despite its relative proximity to Tewkesbury town centre with its associated service and facilities, sites T4a and T4b are discounted as broad locations for further consideration as sites suitable for future development.

T4c is located in close proximity to a primary and secondary school and areas of employment however it is not easily accessible and opportunities to improve its accessibility are very limited, it too is therefore discounted as a broad location for further consideration.

T4d is located furthest from Tewkesbury Town within this broad location and is also subject to flooding. Its development would be unlikely to encourage sustainable modes of transport owing to its distance from services and facilities, therefore this site is also discounted from further consideration as a site suitable for future development.

JCS Sustainability Appraisal – Broad Locations

Site Reference No. T5 Land to the South West of Tewkesbury

Total Area of Site 161.19 ha

SA Objective/Indicator	Notes and Commentary	Performance
12. Biodiversity		
1a Does the broad location contain sites of biodiversity value e.g. SSSI?	Yes/No	T5a - Severn Ham SSSI is located outside of the site but adjacent to the sites north eastern boundary. This SSSI is considered to be of an unfavourable recovering condition. T5b - No
1b Is the broad location within 5km of a European Designated Site (SAC or SPA)	Yes/No/	No GREEN
1c Are there designated BAP Priority Habitats on the site?	Yes/No	T5a - No BAP habitats within the site, however Coastal and Floodplain grazing marsh BAP is situated adjacent to the western site boundary. T5b - Unknown T5a AMBER
1d Would development of the site be likely to lead to fragmentation of important habitats	Yes/No	
1e Will development of the site offer opportunities to link important habitats/create wildlife corridors?	Yes/No	T5a - Good GI connections to Seven Ham and River Severn generally T5b - Good connectivity to similar habitat to south and west
Overall likely biodiversity impact?	Medium low	T5a - Area dominated by amenity grassland of Golf course and sewage works. Golf course has good maturing tree structure actual value of site will depend on management regime of club. Rest of area agricultural mostly arable though with good hedge and tree structure. Good broad leaf native tree cover to North West of golf course GREEN/AMBER
2. Climate Change Mitigation	T5b - Small farmsteads with associated orchard and gardens provide interest For the purposes of broad location SA this objective considers renewable energy potential only. Reduction of carbon emissions through location and transport are dealt with under SA Objective 8. Design of	

	development to reduce carbon will form part of later detailed masterplanning stage of selected broad locations.			
2a Does the site have any renewable energy resource potential?	Yes/No	Further information required.		
2b Is there large energy/heat demand potential from facilities/premises in the area that could benefit from excess heat from decentralized energy e.g. hospital/leisure centre/large manufacturer?	Yes/No	Further information required.		
3. Climate change Adaptation	This objective is not assessed as part of the broad locations SA. Flooding is considered separately and other climate change adaptation techniques will be a fundamental part of the design of individual developments rather than site specific.			
4. Flooding Does the broad location contain areas in Flood Zones 2, 3a or 3b? If so give approximate percentage of the site affected.	Flood zone 2	Flood zone 3a	Flood zone 3b	T5a – 7-10% of site, flood plain along the northern west and north east boundaries of the site following the line of the brook down through bloody meadow and across Lower Lode Lane. T5b – 25% of site, flood plain effectively bisects northern part of site east/west.
	Yes 10%	Yes 10%	Yes 5%	
5 & 6 Natural Resources				
5a Is the site brownfield or Greenfield (if Greenfield state approximate percentage of total area)?	Greenfield 95 %	Predominantly Greenfield T5a – Site is predominantly Greenfield but also contains Council Offices, Tewkesbury Park Hotel and a Sewage Treatment Works. T5b – Site is predominantly greenfield but includes residential dwellings and their curtilages and Southwick Park, a large former dwelling now used as a corporate office HQ but currently vacant.		
5b Does the site contain any existing buildings which could be refurbished?	Yes/No	T5a – No T5b – Possibility of refurbishing/reusing Southwick Park		
5c Does the site contain landscape designations	Yes/No	T5a – All of site except Council Office site is Landscape Protection Zone RED		

e.g. AONB, local designation.			T5b – All of site is Landscape Protection Zone.			RED
5d Overall judgement of landscape sensitivity			ANNICE/TRACEY Red – High, Amber – Medium, Green - Low			
5e Does the site contain high grade agricultural land – Grades 1,2 and 3a (if give the approximate percentage)	Yes/No Grade 1 No	Yes/No Grade 2 No	Yes/No Grade 3 100%	The site is designated entirely as grade 3.		GREEN
5f Would development of the site help clean up contaminated land or eradicate invasive alien plants e.g. Japanese Knotweed?	Yes/No	Further information required.				
6a Are there known mineral deposits? Are these viable and will they need to be extracted before development?	Yes/No	Further information required.				
6b Are there any water supply constraints?	Yes/No	Further information required.				
6c Are there any Sewerage Network/Capacity constraints	Yes/No	Further information required.				
Historic Environment						
7a Does the site contain areas of archaeological significance or historic value.	Yes/No	T5a – No listed buildings however the whole site is within Battlefield Register Boundary being the location of the Battle of Tewkesbury in 1471. T5b - A number of listed buildings along the eastern boundary of the site and northern part of site is within the Battlefield Register Boundary being the location of the Battle of Tewkesbury in 1471.				RED RED
7b Is the broad location within (or partly within) a	Yes/No	Scheduled Ancient Monument of Margaret's Camp adjacent to eastern boundary of T5b. No				

9b Is the site close to an existing or planned waste processing facility?	No			GREEN
10. Economy 10a Is the broad location suitable for a mix of employment opportunities?	Yes/No	T5a – Site could be suitable for B1 uses however it is not particularly suitable for accessing by HGV lorries who would need to approach either by A38 from the south or via Tewkesbury bypass from the M5 motorway. Presence of nearby residential development would limit employment uses possible at the site. T5b – Site could be suitable for a range of B1 uses as lies adjacent to A38 however it is not particularly suitable for accessing by HGV lorries who would need to approach either by A38 from the south or via Tewkesbury bypass from the M5 motorway. Presence of nearby residential development would limit employment uses possible at the site.		AMBER AMBER
10b Is the broad location close to a range of existing employment opportunities?	Yes/No	Tewkesbury Park Hotel and golf course are located within the Broad location. Close to employment opportunities within the town centre. Remote from Tewkesbury Business Park for other employment uses.		AMBER/RED
City and Town Centres Does the site have the ability to create and sustain a vibrant community? Will it support he existing town and city centre facilities or will it help unlock identified needed facilities?	Support Existing Yes/No	Unlock new Yes/No The northern boundary of the site could support the existing town centre facilities due to their close proximity. However, the southern parts and in particular the SW part of the site is more remote and is less likely to support the town centre. The broad location could possibly sustain a vibrant community depending on the services which are provided. If no additional services are provided it is unlikely a vibrant community could be created and sustained due to the proximity to the town centre where primary services and facilities are located.		AMBER/RED
12. and 13. Sustainable Communities	These objectives will be considered at a later stage in the SA/SEA process during the more detailed design and masterplanning stages.			
14. Health				
14 Could development of the site improve access to local health facilities and	Yes/No	T5a - GP & dental facilities in Tewkesbury Town 2/2.5km km to north west. T5b - GP and dental facilities in Tewkesbury Town 2/2.5km to the north from mid point of site.		AMBER

improve health inequalities?		Closest A & E Dept in Gloucester or Cheltenham Tewkesbury Hospital provides for minor injuries and day surgeries.	
15. Housing	All the sites are likely to be able to deliver some identified housing need. The tenure split, ratio of affordable to open market, size and density of housing would form part of a more detailed assessment at a later stage in the SA/SEA process.		
16. Green Space			
16a Does the location provide the opportunity for access to the countryside and natural environment?	Yes/No	Not known	
16b Does the site contain strategic open green space?	Yes/No	Private golf course at Tewkesbury Park Hotel – however this is not of strategic importance.	RED
16c Will it ensure existing open spaces are protected and enhanced?	Yes/No	Not known	
17. Education			
17 a Will the site allow good access to educational facilities or the ability to support existing facility or a new facility?	Yes/No	T5a – Eastern part of site possibly within a 20 minute walk of primary school in York Road but requires crossing the main A38. Rest of site is not within 20 minute walk of a primary school. Site not within 20 minute walking distance of Tewkesbury Secondary School T5b - Western part of site within 20 minute walking distance of John Moore Primary at Wheatpieces however rest of site not really within a 20 minute walking distance of a primary school. Site not within 20 minute walking distance of Tewkesbury Secondary School. Further education provided at Gloucestershire College in Cheltenham. Limited adult education provision in Tewkesbury, more provision in Cheltenham and Gloucester	AMBER/RED AMBER RED RED RED/AMBER
18. Culture and Tourism	The impact on this SA objective will form part of a more detailed SA/SEA assessment later in the JCS process.		
19. Deliverability of Site and other strategic spatial options?			
19a Are there any known needs for essential infrastructure?		The requirements for infrastructure are currently subject to initial appraisal by infrastructure providers.	
19b Will development of	Yes/No	Development of T5 would result in further sprawl to south and west of	AMBER

<p>the site ensure greater self containment of the urban areas?</p> <p>19c Is the site within the Green Belt (summarise findings of greenbelt review).</p>		<p>existing settlement of Tewkesbury. However, development in this location would help to sustain services and facilities in Tewkesbury Town centre contributing to the vitality and vibrancy of the town.</p> <p>The broad location is not located within the green belt.</p>	
<p>Conclusion:</p> <p>This broad location area is one of the few areas peripheral and easily accessible to Tewkesbury town centre which is not subject to major flood constraints, however this is countered by other significant constraints including local landscape and a historical designation (the site lies within the Battlefield register boundary), and part of the site is within a cordon sanitaire of a water treatment plant.</p> <p>Despite these constraints the eastern section of this site south of the Gupshill Manor public house could perhaps be considered further and undergo more in depth appraisal in particular the landscape value of this part of the broad location area and its importance to the historical battlefield designation (bearing in mind that there is already some built development within the historical designated area). However, it is considered that this small sub area of T5b would a) not enable a significant amount of development and b) could be considered to be constitute ribbon development/urban sprawl and for these reasons it is recommended that the whole of T5 be discounted from further consideration in the JCS search.</p> <p>T5a – This broad location has good links to the SSSI of Severn Ham to the north and good green infrastructure links for wildlife to the Severn Ham & River Severn to the north and west. The whole site lies within a Landscape Protection Zone. The northern part of the broad location is subject to flooding, the whole site lies within the Battlefield register boundary and a large part of the site lies within a cordon sanitaire of a water treatment plant. Although the broad location is located in relative close proximity of the Tewkesbury Town centre the aforementioned constraints are significant enough to suggest that T5a should be discounted as an area of search for future development and accordingly it is recommended that this area should not be taken forward for further investigation.</p> <p>T5b – This site is also within the Battlefield register boundary, is subject to Landscape Protection Zone designation and the northern part of the broad location is subject to flooding, however the site has good access to the A38 to the east and via the A38 Tewkesbury Relief Road to the M5 at Junction 9. The site lies adjacent to existing residential development to the north and on the eastern side of the A38 and is within walking distance of a primary school in York Road. A public transport corridor along the A38 provides access to Tewkesbury Town & Ashchurch to the north and to Gloucester and Cheltenham to the south.</p>	<p>Yes/No</p>		<p>GREEN</p>

JCS Sustainability Appraisal – Broad Locations

Site Reference No. T6 Land to the North of Tewkesbury

Total Area of Site 307.52 ha

SA Objective/Indicator	Notes and Commentary	Performance
<p>1a Does the broad location contain sites of biodiversity value e.g. SSSI?</p>	<p>No</p>	<p>T6a – No SSSI however meadows to east of Mythe Farm are subject to annual winter flooding and as such are of importance for waders and wildfowl as well as for their botanical interest.</p> <p>T6b – No</p> <p>T6c – No</p> <p>T6d - No</p> <p>NB: No SSSIs however this broad location contains a range and variety of habitats so will probably have rich biodiversity value. Severn Ham SSSI is located outside of the site but adjacent to the sites southern boundary. This SSSI is considered to be of an unfavourable recovering condition.</p>
<p>1b Is the broad location within 5km of a European Designated Site (SAC or SPA)</p>	<p>No</p>	<p>T6a – No</p> <p>T6b – No</p> <p>T6c – No</p> <p>T6d - No</p> <p>T6a – No</p>
<p>1c Are there designated BAP Priority Habitats on the site?</p>	<p>Yes/No</p>	<p>T6b – Coastal and floodplain grazing marsh SW of the site.</p> <p>T6c – Coastal and floodplain grazing marsh across the entire site. Banks of River Severn forming eastern boundary of sub section C identified in Malvern Hills Local Plan Proposals Map 2006 as a site of Regional or Local Wildlife Importance.</p> <p>RED</p> <p>RED</p>

		T6d- Coastal and floodplain grazing marsh across the entire site. Banks of River Severn forming eastern and southern boundaries of this site are identified on Malvern Hills Local Plan Proposals Map 2006 as a site of Regional or Local Wildlife Importance.	RED
1d Would development of the site be likely to lead to fragmentation of important habitats	Yes/No	A low ridge between the Avon and Seven plus low lying ham to immediate west of Severn. Area between 2 rivers dominated by small field size Improved semi-improved grassland and arable. Good hedgerow and hedgerow trees. Other useful habitats included a smattering of orchard. Un-improved wet grassland (KWS) and open water (KWS). Rough grassland on Shuthonger common and common along Avon also of interest. This contrasts to the land to the West of the Severn. This low lying ham is very intensively farmed. The only interest being provided by the osier beds adjacent to the A438.	AMBER
1e Will development of the site offer opportunities to link important habitats/create wildlife corridors?	Yes/No	Good connectivity to like habitats. Good GI potential of Seven Hams and river Severn/Avon. Generally a good mosaic of interesting habitats and difficult to integrate into development. Medium to high biodiversity value.	RED
Overall likely biodiversity impact?	Medium to high biodiversity value.		
2. Climate Change Mitigation	For the purposes of broad location SA this objective considers renewable energy potential only. Reduction of carbon emissions through location and transport are dealt with under SA Objective 8. Design of development to reduce carbon will form part of later detailed master planning stage of selected broad locations.		
2a Does the site have any renewable energy resource potential?	Yes/No	Further information required.	
2b Is there large energy/heat demand potential from facilities/premises in the area that could benefit from excess heat from decentralized energy e.g. hospital/leisure centre/large manufacturer?	Yes/No	Further information required.	

<p>3. Climate change Adaptation</p>	<p>This objective is not assessed as part of the broad locations SA. Flooding is considered separately and other climate change adaptation techniques will be a fundamental part of the design of individual developments rather than site specific.</p>				<p>AMBER</p>	
<p>4. Flooding Does the broad location contain areas in Flood Zones 2, 3a or 3b? If so give approximate percentage of the site affected.</p>	<p>Flood zone 2 Yes 5%</p>	<p>Flood zone 3a Yes 3%</p>	<p>Flood zone 3b Yes 10%</p>	<p>T6a - Main river centre line and flood zones 3b, 3a and 2 along the eastern boundary. T6b - Main river centre line along the Tewkesbury administrative boundary which lies within the centre of the site with flood plains extending to the dismantled railway. Flood zones 3b and 2 on the western boundary. T6c - All of the land within the Malvern Hills administrative area, falls within the functional floodplain. In terms of surface water flooding, there are large patches of land which would be subject to an intermediate risk of flooding. T6d - All of the land within the Malvern Hills administrative area, falls within the functional floodplain. In terms of surface water flooding, there are large patches of land which would be subject to an intermediate risk of flooding.</p>		<p>AMBER</p>
<p>5 & 6 Natural Resources 5a Is the site brownfield or Greenfield (if Greenfield state approximate percentage of total area)?</p>	<p>Greenfield 95 %</p>		<p>Predominantly Greenfield T6a – All green field except for Mythe Farm, Mythe House and Bradley’s Farm. T6b – Predominantly green field including Shuthonger Common and Mythe marsh area adjacent to River Severn. Line of dismantled railway bisects south. Built development includes buildings around King John’s Castle, Mythe Grange, The Stalls Farm and Mythe Villa. T6c – 100% green field. T6d – 100% green field.</p>		<p>RED</p>	
<p>5b Does the site contain any existing buildings which could be refurbished?</p>	<p>Yes/No</p>					
<p>5c Does the site contain</p>	<p>Yes/No</p>		<p>T6a –All Landscape Protection Zone as identified on TBLP proposals map</p>		<p>RED</p>	

<p>landscape designations e.g. AONB, local designation.</p>		<p>and including the Mythe Meadows (SV 4B) and parts of the Twynning and Upham Meadows (SV 4C) as described in the Gloucestershire Landscape Character Assessment (2006).</p> <p>The Mythe Meadows are open in Character owing to a lack of vegetated areas, allowing uninterrupted views across the floodplain.</p> <p>T6b - Predominantly Landscape Protection Zone plus Key Wildlife Sites at Shuthonger Common and adjacent to River Severn along Mythe Brook.</p> <p>T6c – No landscape designation identified on Malvern Hills Local Plan Proposals Map 2006.</p> <p>T6d - No landscape designation identified on Malvern Hills Local Plan Proposals Map 2006.</p>	<p>RED</p> <p>AMBER</p> <p>AMBER</p>		
<p>5d Overall judgement of landscape sensitivity</p>		<p>Site T6 – overall rating of sensitivity; high</p> <p>The mixture of this low lying hilly terrain is predominantly semi-improved pastures and scattered arable fields enclosed by hedgerows with multiple gaps. There are prominent open views along both the river corridors from a network of public rights of ways and access land which depict the high quality riparian landscape of the river valleys. On either side of the river corridors, the field boundaries, small areas of wooded copse and areas of common are notable due to their distinctive vegetation derived from a variety of soil deposits. The scope for mitigation of any development would therefore have to be very sensitive to the existing landscape and form as the overall quality and value of this landscape is high.</p>	<p>RED</p>		
<p>5e Does the site contain high grade agricultural land – Grades 1,2 and 3a (if give the approximate percentage)</p>	<p>Yes/No Grade 1 No</p>	<table border="1"> <tr> <td data-bbox="1078 1290 1248 1527"> <p>Yes/No Grade 2 10%</p> </td> <td data-bbox="1078 1133 1248 1290"> <p>Yes/No Grade 3 85%</p> </td> </tr> </table>	<p>Yes/No Grade 2 10%</p>	<p>Yes/No Grade 3 85%</p>	<p>The site is predominantly Grade 3 with a small area to the north eastern boundary designated as grade 2.</p>
<p>Yes/No Grade 2 10%</p>	<p>Yes/No Grade 3 85%</p>				
<p>5f Would development of the site help clean up contaminated land or eradicate invasive alien plants e.g. Japanese Knotweed?</p>	<p>Yes/No</p>	<p>Further information required.</p>			

6a Are there known mineral deposits? Are these viable and will they need to be extracted before development?	Yes/No	Further information required.	
6b Are there any water supply constraints?	Yes/No	Further information required.	
6c Are there any Sewerage Network/Capacity constraints	Yes/No	Further information required.	
Historic Environment			
7a Does the site contain areas of archaeological significance or historic value.	Yes/No	T6c - A number of listed buildings located on the western side of the A38. A cluster of listed buildings on Park View to the west of the administrative boundary. These buildings fall within Malvern Hills District Council.	AMBER
7b Is the broad location within (or partly within) a Conservation Area	Yes	Bushley Conservation Area lies immediately adjacent to north western boundary of T6c.	AMBER
8. Transport			
8a Is the broad location in, or close to, an area of high accessibility to key facilities	Yes/No	Site located to the north west periphery of Tewkesbury, abutting watercourses with existing residential development beyond. Site located in close proximity to the town centre for access to a number of key services, however the existence of watercourses around and through the broad location limit permeability.	AMBER
8b Is the site well connected to the transport infrastructure network, and will the location provide opportunities to support travel by non car modes.	Yes/No	A38 runs north/south between T6a and T6b and A438 runs east/west between T6c and T6d however public transport along these routes is relatively poor and frequent services into and out of Tewkesbury are not available. Development in these areas would result in increased car borne journeys for work, school, shopping and leisure journey's. County Info: Less easy to serve by bus, as outside natural and existing corridors. Air quality, congestion and road safety issues would restrict potential for development if the Relief Road is not provided. Access to Ashchurch Station is not easy.	AMBER

			Severance impact of River Severn and Avon creating barrier between the site and the town – problems if bridge closed due to maintenance or other reasons.	
8c	Are there any Highway Junction capacity constraints?	Yes/No	Further information required.	
28. Waste and Pollution				
9a	Is the site close to or within a reduced air quality area?	Yes/No	Unallocated in both the Tewkesbury Local Plan and the Malvern Hills District Local Plan.	GREEN
9b	Is the site close to an existing or planned waste processing facility?	Yes/No	No	
10. Economy				
10a	Is the broad location suitable for a mix of employment opportunities?	Yes/No	T6a – Located on the northern edge of Tewkesbury, on A38 trunk road with residential development. Mixed use employment could be suitable, perhaps towards the southern boundary close to Tewkesbury town centre services, however sustainable transport options are few with a limited bus service into Tewkesbury from the area. T6b – Located on a trunk road. Mixed use employment would be well suited in this location due to the proximity to the town centre and access to good transport links, however sustainable transport options are few with a limited bus service into Tewkesbury from the area. T6c/d – Located on trunk road. Good access for mixed use development opportunities as there are limited residential properties within this part of the broad location however flood zone coverage of T6d and landscape quality of the whole area mean the site is not suited to large scale employment development	AMBER AMBER RED
10b	Is the broad location close to a range of existing employment opportunities?	Yes/No	T6a – Site lies in close proximity to employment opportunities in Tewkesbury Town and south of site is within 2 km of Tewkesbury Industrial estate. T6b – Site is located 1.5/2km from Tewkesbury Town employment opportunities and approximately 3km from Tewkesbury Industrial Estate.	GREEN AMBER AMBER

			T6c – Site is located 2/2.5km from Tewksbury Town employment opportunities	RED
			T6d – Discounted as is in floodplain	RED
29 City and Town Centres Does the site have the ability to create and sustain a vibrant community? Will it support the existing town and city centre facilities or will it help unlock identified needed facilities?	Support Existing Yes/No	Unlock new Yes/No	While development in T6 would help sustain the vitality and viability of services and facilities in Tewkesbury Town it would also result in urban sprawl to the north of the town with a high dependence on the car for most journeys. Therefore it is not expected to perform particularly well against the objective to sustain a vibrant community.	AMBER
12. and 13. Sustainable Communities	These objectives will be considered at a later stage in the SA/SEA process during the more detailed design and masterplanning stages.			
14. Health				
14 Could development of the site improve access to local health facilities and improve health inequalities?	Yes/No	T6a - GP & dental facilities in Tewkesbury Town approx 1.5km to south. T6b - GP & dental facilities in Tewkesbury Town approx 2km to south east. T6c - GP & dental facilities in Tewkesbury Town approx 2km to south east. T6d - Discounted as is in floodplain Closest A & E Dept in Gloucester or Cheltenham Tewkesbury Hospital provides for minor injuries and day surgeries.		AMBER/RED
15. Housing	All the sites are likely to be able to deliver some identified housing need. The tenure split, ratio of affordable to open market, size and density of housing would form part of a more detailed assessment at a later stage in the SA/SEA process.			
16. Green Space				
16a Does the location provide the opportunity for access to the countryside	Yes/No	T6a – Public footpaths through the site link into riverside walk along River Avon, not useable when river is in flood and to Church End.		GREEN/AMBER

and natural environment?		T6b – Not good public footpath linkages out of site owing to presence of riverside marsh. T6c – Linkages north and south along western bank of River Severn not useable when river is in flood T6d – Linkages north and south along western bank of River Severn not useable when river is in flood.	
16b Does the site contain strategic open green space?	Yes/No	No	
16c Will it ensure existing open spaces are protected and enhanced?	Yes/No		
17. Education			
17 a Will the site allow good access to educational facilities or the ability to support existing facility or a new facility?	Yes/No	T6a - Southern part of site between dismantled railway and River Avon may be within a 20 minute walk of Mitton Manor or Tewkesbury C of E Primary School however rest of site is not in close walking proximity to a primary school. Site not within 20 minute walking distance of Tewkesbury Secondary School. T6b - This site is not within a 20 minute walk of either a primary or secondary school. T6c - This site is not within a 20 minute walk of either a primary or secondary school. T6c – Discounted as is in floodplain. Further education provided at Gloucestershire College in campuses at Cheltenham or Gloucester. Limited provision of adult education in Tewkesbury, more providers in Gloucester and Cheltenham. County Info:	RED RED RED RED RED/AMBER

		<p>If developed along with T1 and / or T2 consideration will need to be given to the cumulative impact upon the existing early year's / primary network. Particularly, when reviewing on-site or off-site options and / or when taking into account 'existing capacity' with the modelling (size and scale) of any new on-site provision.</p> <p>Similarly, the cumulative impact upon the existing secondary network (if developed alongside T1 and / or T2) will be an important issue as off-site provision is the most likely solution in this instance.</p> <p>Early advice on the requirements of other infrastructure services would be welcomed so as to give as much opportunity as possible to explore a more integrated / shared services solution (the development of the community hub model).</p>	
18. Culture and Tourism	The impact on this SA objective will form part of a more detailed SA/SEA assessment later in the JCS process.		The impact on this SA objective will form part of a more detailed SA/SEA assessment later in the JCS process.
19. Deliverability of Site and other strategic spatial options?			
19a Are there any known needs for essential infrastructure?		The requirements for infrastructure are currently subject to initial appraisal by infrastructure providers.	
19b Will development of the site ensure greater self containment of the urban areas?	Yes/No	While development in T6 would help sustain the vitality and viability of services and facilities in Tewkesbury Town it would also result in urban sprawl to the north of the town with a high dependence on the car for most journeys.	AMBER
19c Is the site within the Green Belt (summarise findings of greenbelt review).	No	No	GREEN
<p>Conclusion: T6a – This broad location is subject to flooding from River Avon along eastern boundary and although there are no SSSIs the seasonal flooding of the meadows adjacent to the River result in an area that is rich in biodiversity and regionally important for wading and over wintering species. The whole site lies within a Landscape Protection Zone. The southern part of the site lies in close proximity to Tewkesbury Town but does not enjoy good access to public transport services such that development would be generally dependent on car bourn journeys. There are no schools or primary health care facilities within a 20 minute walk of the site and it does not lie in close proximity to areas of employment other than Tewkesbury Town Centre. The site would be relatively inaccessible from Junction 9 of the M5 motorway for employment purposes and any increased volume of traffic would require the completion of the Tewkesbury Relief Road. For the reasons described above it is recommended that this site is discounted from the study and not taken forward for further consideration.</p>			

T6b – The western half of this site is subject to flooding associated with the River Severn and the whole site lies within a Landscape Conservation Area. There are Key Wildlife Sites at Shuthonger Common and adjacent to River Severn along Mythe Brook. The site is well served by the A38 along the eastern boundary however this route does not enjoy good access to public transport services such that development would be generally dependent on car borne journeys. There are no schools or primary health care facilities within a 20 minute walk of the site and it does not lie in close proximity to areas of employment other than Tewkesbury Town Centre. The site would be relatively inaccessible from Junction 9 of the M5 motorway for employment purposes and any increased volume of traffic would require the completion of the Tewkesbury Relief Road. For the reasons described above it is recommended that this site is discounted from the study and not taken forward for further consideration.

T6c – This 100% green field site lies within the administrative area of Malvern Hills District Council and is totally floodplain associated with the River Severn. For this reason it is recommended that the site is discounted from the study and not taken forward for further consideration.

T6d - This 100% green field site lies within the administrative area of Malvern Hills District Council and is totally floodplain associated with the River Severn. For this reason it is recommended that the site is discounted from the study and not taken forward for further consideration.

County Libraries info:

Encourage early and open dialogue between potential infrastructure / service providers, particularly where alternative, integrated / shared services solution may be possible. From the library service perspective examples include:- better alignment with public transport to improve accessibility and the expansion of co-location opportunities (e.g. with youth services, children's centres, Police, GP and health care, district and / or town council services, and volunteer / 3rd sector activities etc.)

If strategic-scale development growth is taken forward in this locality (several thousand units across T1 and / or T2 and / or T6) careful consideration will need to be given to a review of the form and status of the proposed local tiered libraries. This may also result in new (on-site) facilities and / or significant re-modelling of the existing provision.

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