CHELTENHAM
BOROUGH COUNCIL

# Notice of a meeting of Council

## Friday, 10 February 2017
## 2.30 pm
## Council Chamber - Municipal Offices

| Membership | |
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| **Councillors:** | Chris Ryder (Chairman), Klara Sudbury (Vice-Chair), Matt Babbage, Paul Baker, Garth Barnes, Ian Bickerton, Nigel Britter, Flo Clucas, Chris Coleman, Mike Collins, Bernard Fisher, Wendy Flynn, Tim Harman, Steve Harvey, Colin Hay, Rowena Hay, Karl Hobley, Sandra Holliday, Peter Jeffries, Steve Jordan, Adam Lillywhite, Chris Mason, Helena McCloskey, Paul McCloskey, Andrew McKinlay, Dan Murch, Chris Nelson, Tony Oliver, Dennis Parsons, John Payne, Louis Savage, Diggory Seacome, Malcolm Stennett, Pat Thornton, Jon Walklett, Simon Wheeler, Roger Whyborn, Max Wilkinson, Suzanne Williams and David Willingham |

**A Moment of Reflection**
(to be led by the Mayor or the Mayor's Chaplain)
*This will be of an inclusive nature. All Members are welcome to participate but need not do so.*

## Agenda

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| **1.** | **APOLOGIES** | |
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| **2.** | **DECLARATIONS OF INTEREST** | |
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| **3.** | **MINUTES OF THE LAST MEETING**<br>Minutes of the meeting held on 12 December 2016 | (Pages 3 - 32) |
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| **4.** | **COMMUNICATIONS BY THE MAYOR** | |
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| **5.** | **COMMUNICATIONS BY THE LEADER OF THE COUNCIL** | |
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| **6.** | **TO RECEIVE PETITIONS** | |
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| **7.** | **PUBLIC QUESTIONS**<br>These must be received no later than 12 noon on Monday 6 February 2017. | |
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| **8.** | **MEMBER QUESTIONS**<br>These must be received no later than 12 noon on Monday 6 February | |

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| **9.** | **FINAL GENERAL FUND REVENUE AND CAPITAL BUDGET PROPOSALS 2017/18 (INCLUDING SECTION 25)**<br>Report of the Cabinet Member Finance-TO FOLLOW | |
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| **10.** | **FINAL HOUSING REVENUE ACCOUNT (HRA) BUDGET PROPOSALS 2017/18**<br>Report of the Cabinet Member Finance-TO FOLLOW | |
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| **11.** | **TREASURY MANAGEMENT STRATEGY STATEMENT AND ANNUAL INVESTMENT STRATEGY 2017/18**<br>Report of the Cabinet Member Finance | (Pages 33 - 70) |
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| **12.** | **FUTURE PROVISION OF EXTERNAL AUDIT**<br>Report of the Cabinet Member Corporate Services | (Pages 71 - 84) |
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| **13.** | **GLOUCESTER, CHELTENHAM AND TEWKESBURY JOINT CORE STRATEGY-MAIN MODIFICATIONS REPORT**<br>Report of the Leader | (Pages 85 - 266) |
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| **14.** | **NOTICES OF MOTION** | |
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| **15.** | **ANY OTHER ITEM THE MAYOR DETERMINES AS URGENT AND WHICH REQUIRES A DECISION** | |
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**Contact Officer**: Rosalind Reeves, Democratic Services Manager, 01242 774937
**Email**: democratic.services@cheltenham.gov.uk

**Pat Pratley**
**Head of Paid Service**

# Council

## Monday, 12th December, 2016
## 2.30 - 7.00 pm

| Attendees | |
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| **Councillors:** | Chris Ryder (Chairman), Klara Sudbury (Vice-Chair), Matt Babbage, Paul Baker, Garth Barnes, Nigel Britter, Chris Coleman, Mike Collins, Bernard Fisher, Wendy Flynn, Tim Harman, Steve Harvey, Colin Hay, Rowena Hay, Karl Hobley, Sandra Holliday, Peter Jeffries, Steve Jordan, Adam Lillywhite, Chris Mason, Helena McCloskey, Paul McCloskey, Andrew McKinlay, Dan Murch, Tony Oliver, Dennis Parsons, John Payne, Louis Savage, Diggory Seacome, Malcolm Stennett, Pat Thornton, Jon Walklett, Simon Wheeler, Roger Whyborn, Max Wilkinson, Suzanne Williams and David Willingham |

## Minutes

**1. APOLOGIES**

Apologies were received from Councillors Flo Clucas and Chris Nelson.

**2. DECLARATIONS OF INTEREST**

Councillor Jeffries declared a personal interest in agenda item 16 for reasons previously given.
Councillor Whyborn declared an interest in agenda item 16 as a trustee of St Margaret's Hall and announced his intention to leave the meeting for that item. Similarly Councillor McKinlay declared an interest as the Council's representative on the hall committee.

**3. MINUTES OF THE LAST MEETING**

The minutes of the meeting held on 17 October and the extraordinary meeting on 18 October were approved as a correct record.

**4. COMMUNICATIONS BY THE MAYOR**

The Mayor advised Members that Rob Bell, the MD of Ubico was retiring before Christmas. He had worked for the council for many years before that and she invited Members to sign his leaving card.

The Mayor updated Members on her engagements since the last Council meeting in October. These included:

- The launch of the poppy appeal had started at GCHQ with the 'Waterfall' of handmade poppies made by GCHQ employees, WI members and Girls Guides. This year our trees on the Promenade sported knitted and Crochet jackets to launch Gloucestershire and Cheltenham poppy appeal. The Mayor thanked Members who had attended Remembrance

Sunday at the Memorial in the morning and the event at the Town Hall in the evening.

- The Mayor thanked all Members who attended the 'Mayflower' fundraising evening for my charities, this was an opportunity to present the VisitCheltenham Hospitality Trophy award Mr. Chun Kong restaurateur for 34 years in the town and for his charitable work.
- Accepted the Purple Flag award for the town with Cllr.McKinlay & officers from Licensing & Protection along with Police Commissioner Martin Surl.
- Attended the University of Gloucestershire Awards at the Centaur, it had been an honour in her robes to present 'The Cheltenham Silver Bowl' to a well deserved student for her work in the local community. Gloucestershire College Higher Awards took place at Gloucester Cathedral; and it had been a pleasure to be in attendance.
- The Mayor had welcomed Princess Anne at two events along with Councillors Mr & Mrs Hay at the Racecourse and the Town Hall.
- Attended the funeral service of Miss Stella Fisher who had been Chair of Cheltenham in Bloom in the 1990s who had raised the profile of our Parks Department and helped achieve many accolades for the Town.
- The Mayor had attended at School Christmas singing events which have been superb and she would have attended over 12 Carol services and concerts through December. She thanked her Chaplain Tudor Griffiths for the Carol Service at The Minster.

**5. COMMUNICATIONS BY THE LEADER OF THE COUNCIL**

The Leader advised that the next debate on the JCS would be at Council on 10 February. This meeting would follow a similar debate at Tewkesbury Borough Council on 31 January so he anticipated a short debate.
He advised that after taking soundings from other Members he had submitted a personal response to the government consultation on the Parliamentary boundary review. He did not support the removal of Springbank from the Parliamentary constituency for Cheltenham as he did not consider this was necessary to make up electoral numbers.

**6. PUBLIC QUESTIONS**

Although there were no public questions for this meeting the Mayor took the opportunity to address Council on the general issue of Member and public questions for Council as she had some concerns following the Council meeting on 17 October. She felt it was very important how Members were perceived by the public and since the meeting she had met with officers to review how the process could be improved. There had also been discussions with Group Leaders and this had resulted in a set of guidelines which she wished to adopt for future meetings. She emphasised that these were not constitutional changes but they represented a set of good practice for the procedures and behaviours to be followed in the Council chamber.

Firstly the Leader would aim to get answers to questions with Democratic Services by 10 am on the day of the Council meeting subject to getting all the technical input needed. Democratic Services will advise the public that the questions and responses will be available on the website on the morning of the

meeting by 11 am, allowing that some may require further finalisation on the day. This should give questioners plenty of time to review the responses given and prepare any supplementary questions.

At the start of Public Questions the Mayor will remind any public in the gallery that hard copies of the questions and responses are available at the back of the gallery so they can follow proceedings.

The Mayor will stress to Members of the public that questions and responses will be taken as read to save time unless they make a specific request to read out their question which is their right under the Constitution. The Constitution allows 30 minutes in total for questions which could be extended at the Mayor's discretion but it was important to make the best use of the time available and allow time for everybody to ask their questions.

Regarding supplementary questions, these should be directly related to the original question or the response and be a question rather than a statement and a lot of background should not be necessary. The Mayor would enforce this during the meeting and prompt the questioner to put their question when necessary.

When responding to questions the Mayor urged Members to respond specifically to the supplementary question asked and answer it concisely.

If a questioner feels their question has not been answered then just repeating their original question is likely to get the same answer so the questioner could consider asking the question in a different way.

The Mayor reminded Members that it is more difficult for the public in the gallery to follow the debate so she asked Members to speak clearly into the microphones and keep any papers clear of the microphones.

During all the proceedings the Mayor requested that Members treat each other and the public with respect. The Council should be encouraging the public to get involved and ask questions so Members needed to respond politely, positively and with clarity.

Finally the Mayor asked the Head of Legal Services to clarify the differences between points of order and points of personal explanation as there had been a number of these at recent meetings. He referred Members to section 13.30 of the Council Procedure Rules.

## 7. MEMBER QUESTIONS

There were 15 Member Questions.

| 1. | **Question from Councillor Tim Harman to the Cabinet Member Healthy Lifestyles, Councillor Flo Clucas** |
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| | Will the Cabinet Member consider promoting an Open Air Ice Skating Rink at an appropriate location next year similar to those which are successful and popular in other Towns and Cities? |
| | **Response from Cabinet Member** |
| | In thanking the Councillor for his question, I am mindful that this is being |

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| | discussed in other quarters. Until I know what the outcome of those discussions is, I feel I would be on a slippery slope; skating on thin ice indeed if I were - at this moment - to respond!<br><br>In a supplementary question, Councillor Harman indicated that he would be happy to receive a more detailed response outside the meeting should there be commercial sensitivity but he was keen to know whether the Cabinet member considered this type of attraction would be good in principle.<br><br>The Leader responding on behalf of Councillor Clucas, advised that the council had supported similar events in the past and would encourage other organisations to put on such events. He noted that the ice rink in Gloucester was entirely privately funded. The BID had been discussing plans for Christmas in the town next year and although these discussions were not commercially sensitive this was not the council's conversation hence the response from Councillor Clucas. |
| **2.** | **Question from Councillor Dennis Parsons to the Cabinet Member Healthy Lifestyles, Councillor Flo Clucas** |
| | 28 February 2017 marks the 75th anniversary of the birth of Brian Jones, founder of the Rolling Stones. I understand that the bust of Brian that was removed from the Beechwood Arcade has been due to be put back on public display for some time. Can we be told when and where this will happen; and can we be assured that plans are in place to celebrate on 28 February 2017, the birth and sadly short life of a man who, to many, is Cheltenham's most notable son. |
| | **Response from Cabinet Member** |
| | The bust of the late Brian Jones is currently with The Cheltenham Trust. The Trust is looking into its display at the Town Hall during 2017; details are being finalised and will be publicised. I understand that the Trust is also considering how the anniversary of his birth can be marked.<br><br>In a supplementary question, Councillor Parsons noted that there were two Council meetings between now and the anniversary and he would ask the question again at those meetings. |
| **3.** | **Question from Councillor Jon Walklett to the Cabinet Member Housing, Councillor Peter Jeffries** |
| | Would the Cabinet Member please comment on early results being generated by the Private Rented Sector HMO survey of St Paul's ward currently being conducted by CBC's Private Housing team. I believe Interim figures as reported to O&S on 28th November seemingly substantiate the views of both St Paul's residents and cross-party members of this Council's Planning Committee that additional planning control by way of an Article 4 directive to remove permitted development rights in the ward will need to be sought early 2017 - does the Cabinet Member agree ? |
| | **Response from Cabinet Member** |
| | The full results of the survey will be available for analysis in January/February next year. Early indications suggest there are in the region of 300 HMO's (circa 10% of stock) in the St Pauls ward area, the majority of which are being managed |

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| | satisfactorily.<br><br>The survey is gathering evidence on the environmental impact of HMO's in the St Pauls area in addition to property safety and management. Refuse issues, amenity issues and parking requirements are being recorded as well as evidence of anti-social behaviour relating to the house. This will help inform any decision regarding the making of an article 4 direction in this ward.<br><br>Government guidance states that Local Authorities should only consider making an article 4 direction in exceptional circumstances where the exercise of permitted development rights would harm local amenity or the proper planning of the area.<br><br>Impact on visual amenity, damage to the historic environment, undermining local objectives to create or maintain mixed communities and social and economic impact directly related to the prevalence of HMO's, are all factors which would need to inform any decision. These factors should be benchmarked against other areas of the Borough where HMO's are less prevalent.<br><br>It therefore follows that the use of an article 4 direction to remove permitted development rights in the St Pauls ward will need to be progressed if the community concern which has been raised is mirrored in the evaluated evidence.<br><br>In a supplementary question Councillor Walklett indicated that a number of premises inspected had been found to be unlicensed and he asked whether a follow-up process was in place for addressing these properties.<br><br>In response the Cabinet Member confirmed that a process was in place for dealing with these unlicensed premises as they were picked up. |
| **4.** | **Question from Councillor Matt Babbage to the Cabinet Member Clean and Green Environment, Councillor Chris Coleman** |
| | What were the estimated recycling levels and financial costs of the discounted long-list options from the waste & recycling service redesign assessment? |
| | **Response from Cabinet Member** |
| | The long-list of 20 options were reduced to a shorter list of 7, based on a combination of expert advice and common sense. The whole point of reducing the long-list to a shorter range of options was so that a more manageable list of options could then be worked on to consider and compare recycling levels and their respective financial costs. When whittling them down from 20 to 7, the options were discounted on any one of the following reasons:<br><br>· The option could be perceived as a service reduction compared with what is offered to residents currently.<br>· The option was a less comprehensive (and therefore less attractive) offer than the 3 weekly refuse collection offer that was subsequently consulted on.<br>· The option offered what was likely to be a much more costly recycling collection service (because it was a weekly offer), and this was considered to be unaffordable unless a service reduction was offered elsewhere (hence the 3 weekly refuse option of 5b)<br>· The option offered a comingling service that included glass. This option is |

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| | considered no longer to be favoured by the industry and leads to higher gate fees/tonne to sort, with higher risks of non-compliance with Waste Regulations 2011 due to expected increases in recyclate contamination levels.<br><br>The shortlist of 7 then underwent some high level indicative modelling on the estimated financial costs and recycling levels. Of the two options that were subsequently discounted, both were found to be within the indicative cost range of all the options modelled, and indeed they fell within the cost range of the 3 options that were eventually put out to consultation. These 2 options both proposed a 3 weekly refuse collection service. It was therefore expected that recycling levels would be in line with those estimated for the 3 weekly refuse option, which was consulted on. The reason these 2 options were discounted was not for financial reasons, or for reasons to do with recycling levels. One of the options simply offered a less attractive service option than the 5b option (3 weekly refuse collection). The other option was discounted because it was decided instead to consult with residents on what they considered the most important enhancements should be (in terms of what additional recyclates could be collected from the kerbside) across all 3 of the service options, rather than simply providing the enhancement option on the 3 weekly refuse collection service option alone.<br><br>In a supplementary question, Councillor Babbage referred to the number of long list options that had been discounted and asked for the precise costs of options 6A with a weekly recycling but fortnightly bin collection.<br><br>The Cabinet Member advised that in dealing with this question the officer who could provide detailed information was on annual leave which is why the figures were not attached but he would be happy to forward them to all Members when they were available. |
| **5.** | **Question from Councillor Matt Babbage to the Cabinet Member Built Environment, Councillor Andrew McKinlay** |
| | What are the latest air pollution statistics for Air Quality Management Areas (AQMA) in Cheltenham? How does this compare to previous years? |
| | **Response from Cabinet Member** |
| | The published 2015 air pollution data is the most recent available (i.e. up to December 2015).<br><br>The Council, on a monthly basis, places passive monitoring devices (commonly known as NOx tubes) at various locations within the Borough in order to monitor Nitrogen Dioxide. These tubes are used to assess whether that particular location, over a calendar year, passes or fails the air quality objective for Nitrogen Dioxide.<br><br>It will not be possible to fully assess 2016 air quality levels until the readings for December are received, around the middle of January. However, Cheltenham has experienced only a slight movement in Nitrogen Dioxide readings over the past 5 years and there are still several distinct town centre locations which are likely to continue to fail the relevant objective, due almost solely to vehicular traffic. Any downward trend is invariably offset by year-on-year increases in the use of motor vehicles for the expanding population.<br><br>Only radical measures to address congestion, such as those set out in the |

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| | Cheltenham Transport Plan are likely to have a significant impact on the distribution of air quality impacts. |
| **6.** | **Question from Councillor Matt Babbage to the Cabinet Member Built Environment, Councillor Andrew McKinlay** |
| | What steps have the council taken in the last year to address the issue of air pollution in Cheltenham generally, and in AQMA areas specifically? |
| | **Response from Cabinet Member** |
| | The Council decides, at year end, whether it is necessary to continue monitoring for Nitrogen Dioxide at current locations, or whether to discontinue this if the past 4 years indicates that the location in question always comes below the limit values. We also look at putting monitoring devices at locations where new or increased residential areas are in existing poor air quality locations.<br><br>The authority is involved in a range of projects which will impact on air quality and has set out specific actions in its Air Quality Action Plan. The first phase of the Cheltenham Transport Plan which the authority has championed has been implemented, improving the access to car parks from vehicles approaching the town from the west and saving them from having to circle the ring road.<br><br>We have worked with Gloucestershire County Council (GCC) to formulate a joint bid under the Air Quality Grant Scheme 2016-17, which has since been submitted to the Department for Transport. This bid asks for funding to commission specific electronic traffic signage, directing visitors to the town centre to the nearest vacant car parking spaces, hence avoiding vehicles taking longer than normal routes and thereby helping to reduce vehicle emissions.<br><br>The Council has also worked with GCC with regard to another initiative, the 'Air Quality School Pilot Project', which is incorporated into the Thinktravel Schools Programme. The County are funding the project through the Thinktravel grant. The project looks to supply schoolchildren with personal Carbon Monoxide monoitors, so that levels of that pollutant can be assessed at the time students arrive at the school gate. The Thinktravel Schools Engagement programme aims to reduce car travel and increase levels of active travel, through an accredited travel plan scheme. This will examine issues and solutions raised through the AQ School Pilot Project as part of the evidence for schools' travel plans. This study is ongoing.<br><br>The Council recently also contacted a local bus company about vehicle idling, which has led to that company reminding their drivers to switch off their engines when at all possible. This is already taking place and such a measure is likely to have a direct result in improving local air quality. |
| **7.** | **Question from Councillor Matt Babbage to the Cabinet Member Housing, Councillor Peter Jeffries** |
| | How many families/individuals are currently on the housing waiting list in Cheltenham? How does this compare with previous years? How long on average have these families/individuals been on the list? |
| | **Response from Cabinet Member** |
| | Currently there are 2823 individuals or families on the Housing list.<br>In terms of how this compares with previous years please see below: |

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| Nov 2016 | 2805 |
| April 2016 | 2755 |
| Nov 2015 | 2500 |
| April 2015 | 2469 |
| Nov 2014 | 2534 |

The average length of time families or individuals have spent on the Housing list is not recorded, as part of the Review of the Housing Options service this may be subject to change.

**8. Question from Councillor Matt Babbage to the Cabinet Member Housing, Councillor Peter Jeffries**

How many families/individuals on the housing waiting list were allocated a home in the last year? How does this compare with previous years? How long on average had these families/individuals been on the list?

**Response from Cabinet Member**

Applicants housed:

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| 2016 / 17 (till end of Nov) | 258 |
| 2015/ 16 | 486 |
| 2014 / 15 | 506 |

The average length of time families or individuals had spent on the Housing list is not recorded, as part of the Review of the Housing Options service this may be subject to change.

**9. Question from Councillor Matt Babbage to the Cabinet Member Housing, Councillor Peter Jeffries**

How many families/individuals withdrew or were taken off the housing waiting list in the last year? How does this compare with previous years? How long on average had these families/individuals been on the list?

**Response from Cabinet Member**

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| | The number of applicants coming off the list was not something previously recorded so information is very limited as part of the Review of the Housing Options service this will be subject to change. |
| **10.** | **Question from Councillor Chris Mason to the Cabinet Member Finance, Councillor Rowena Hay** |
| | Would the Cabinet Member for finance please confirm the cost of the 2011 Tourism and marketing strategy report, and the 2015 tourism strategy report? |
| | **Response from Cabinet Member** |
| | The 2011 tourism and marketing strategy report was carried out by a joint scrutiny time limited working group. There were no external costs attached to producing it, the internal and member costs, as far as I am aware were never separately identified, what I do know is that a member namely John Rawson wrote the final report.<br><br>The cost of the 2015 strategy report carried out by Creative Tourist Limited was £22, 750. |
| **11.** | **Question from Councillor Chris Mason to the Leader, Councillor Steve Jordan** |
| | Earlier this year the Leader of the council said that he was delighted with the 2015 tourism annual growth figure. Would he agree that unfortunately the liberal democrat led council can take no credit in achieving this and that ignoring all the recommendations in the 2011 tourism and marketing strategy report it commissioned was a mistake? |
| | **Response from Cabinet Member** |
| | The Liberal Democrat administration recognises that developing a tourism offer is very much a partnership activity and have always worked to ensure we have a town that people can enjoy living and working in and well as visiting. We have set up a Tourism Partnership to ensure close working with those involved in the tourism industry locally. In addition we support the work done by the Cheltenham Business Improvement District and the Cheltenham Development Task Force among others as we recognise that they contribute to making Cheltenham an attractive place to visit<br><br>I am mystified why Cllr Mason claims the previous recommendations were ignored since it isn't the case. It is true that in the intervening 5 years circumstances have changed not least that the Chetlenham Trust now run the Cheltenham Tourism Information Centre and the LEP have withdrawn from funding tourism support activities at a county level. However we are working closely with the LEP on initiatives such as the Digital High Street. Based on the work of Creative Tourist Limited we have agreed and are implementing an action plan with the Tourism Partnership.<br><br>In a supplementary question, Councillor Mason referred to a recent media release from the council which had stated that tourism was 5% up in August and other statistics. However in the context of figures released by Visit Britain and with the success of Marketing Gloucester in promoting tourism in Gloucester would the Leader acknowledge that this council's actions on tourism were pathetic and |

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| | woeful?<br><br>The Leader did not agree that the figures were bad and the council had set up a Tourism Partnership to enhance them. The CDTF was set up to improve the civic realm and the council was also trying to encourage the county council to play their part in improving areas which came under their remit. The BID would also play a key role. Gloucester's tourism figures may have been helped by the Rugby World Cup event. There was lots that the council could do and they were doing it. |
| **12.** | **Question from Councillor John Payne to the Cabinet Member for Clean and Green Environment, Councillor Chris Coleman.** |
| | In the quarterly progress report it stated that the Crematorium was now not expected to be completed until early 2019.<br><br>I would be obliged if the Cabinet Member could outline the cause of this delay, and if possible quantify the impact on the budget. |
| | **Response from Cabinet Member** |
| | As Councillor Payne is on the Member working group which has been acting as a sounding board for the project, he will be aware that the authority has not yet contracted for the construction of the new crematorium, but is proceeding with the pre-construction phase, which will result in the submission of a detailed planning application.<br><br>In light of the above, the timetable for delivery of the new facility is not yet fixed and there has never been a definitive date given for project completion. The cross-party member working group has always been supportive of the need to deliver this project to an acceptable quality and has been made fully aware of the range of risks relating to the project, including those which may impact on costs and/or the delivery timetable.<br><br>The timetable remains an important consideration due to the limited life expectancy of the existing cremation plant and Spring 2019 is the current best estimate of the likely completion date.<br><br>I am pleased to advise that the project is still currently within the Council approved budget. Recent pressures on the project timetable have related to procurement procedures and the commissioning of study reports which will support the design and planning application process. It is hoped that the extensive preparatory work undertaken will have a positive impact on the project plan timetable further down the line.<br><br>In a supplementary question, Councillor Payne indicated that the timescales for the project had been extended and it had been reported to O&S that implementation could now be early 2019. Given the particular history of the cremators and the recent appearance of black smoke coming from them, what contingency plans does the council have if the cremators should fail in the interim?<br><br>The Cabinet Member advised that contingency plans are in place for every eventuality and they had indeed been activated in the past. These involved |

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| | working with other facilities and seeking support from other councils, particularly Gloucester. These plans had been put in place regardless of the development project and after further reviews he was very confident that all the necessary contingency plans were in place. |
| **13.** | **Question from Councillor John Payne to the Cabinet Member for Development and Safety, Councillor Andew McKinlay** |
| | The 2015 report on air quality is Cheltenham provided some interesting comments observations. Firstly according to the report the annual level of Nitrogen Dioxide had remained fairly constant, which suggests that either remedial action had not taken place, or if it had it had been effective. However, may main concern, and I would appreciate some clarification on the issue. The report states:<br><br>• There are continued exceedances of the nitrogen dioxide annual mean objective within the AQMA.<br>• There are no other pollutants of concern within Cheltenham Borough Council.<br><br>The first statement is clearly of concern, but the second is confusing. How do we know there are no pollutants of concern if we have not tested for them? The argument that the levels when last tested were with the accepted limits does not in my view justify suspension of monitoring. Monitoring should be continuous in order to provide a level of confidence and to detect trends early. |
| | **Response from Cabinet Member** |
| | The 2015 Air Quality Assessment did indicate a fairly static situation with regard to poor air quality in certain central areas of the town.<br><br>It is difficult to assess whether specific air quality improvement measures outlined in the Air Quality Action Plan (AQAP) have contributed to an improvement in air quality in the town centre, as there is invariably a corresponding increase in vehicle usage annually. Despite concerted efforts to encourage modal shift, it is difficult to persuade car drivers to leave their cars at home and use public transport, bike, or walk into the town centre, or to walk their children to school.<br><br>There will continue to be exceedences of the nitrogen dioxide annual mean objective at a small number of town centre locations until traffic issues are addressed and the Borough Council can only seek to influence how highways are managed by the County Council.<br><br>With regard to “other pollutants of concern” CBC undertook a Stage 1 review of air quality in 1999, which indicated that only two pollutants, nitrogen dioxide (NO2) and particulates (PM10) required more detailed consideration. A Stage 2 assessment was undertaken in 2000, which concluded that a Stage 3 assessment would be required for NO2 only. The ‘Cheltenham Borough Council Progress Report 2003’ sets this out in more detail by pollutant, including the reasons why Nitrogen Dioxide was the only pollutant which needed to be monitored annually.<br><br>This report can be found here<br><br>https://www.cheltenham.gov.uk/info/66/environmental_protection_and_pollution/2 |

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| | 88/air_quality/2<br><br>Although several locations fail the limit values for Nitrogen Dioxide, the readings show only marginal exceedences. These compare favourably to larger conurbations where measured values can be around double the limit values. Some areas of London for example experience readings for Nitrogen Dioxide of the order of 90 microgrammes per cubic metre, way above the limit value of 40 microgrammes per cubic metre.<br><br>There is a very close correlation between particulate matter and Nitrogen Dioxide. Where NO2 levels are around the limit values, the levels for particulate matter are very much below the limit value for that pollutant. This is the basic premise for discontinuing the monitoring of particulates.<br><br>In a supplementary question, Councillor Payne noted that there had been little improvement in air quality in the last five years as evidenced in the 2015 report. It had been suggested that air quality should be improved once the Cheltenham Transport Plan was implemented and he asked what measures would be put in place to demonstrate this?<br><br>In response the Cabinet Member confirmed that there were three areas of the road network in Cheltenham where NO2 levels were above the recommended safety levels. The main cause of this pollution was standing traffic and the implementation of the CTP in these areas was designed to promote good traffic flow. Levels would be monitored using existing measures so that comparisons could be made and he would certainly hope to see reductions in the levels. |
| **14.** | **Question from Councillor John Payne to the Cabinet Member for Development and Safety, Councillor Andew McKinlay** |
| | In the Athey Report, January 2015 it noted that the Cheltenham workforce was well educated and skilled, but that productivity was lower than expected. The Council were encouraged to focus upon attracting and supporting businesses which add high value GVA (Gross Value Added) into the economy.<br><br>Could the Cabinet Member outline what progress has been made in attracting and supporting businesses? |
| | **Response from Cabinet Member** |
| | This administration commissioned the Athey Report which identified some negative economic trends that had developed over a significant time period. In response, the Council's senior management team was restructured providing a strong focus on Place-shaping and economic growth. Over the last 12 months, considerable progress has been made driving this growth agenda forward, of which increasing productivity levels is an important element. We have been putting significant focus on the delivery of an employment growth area at West Cheltenham and the JCS inspector has indicated support for bringing this site forward.<br><br>Officers, with the support of the Cheltenham Development Task Force, are now working in collaboration with Government departments, GCHQ, the LEP, County Council, the local MP and other stakeholders, to deliver a hi-tech cyber business |

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| | park with the GCHQ innovation centre for national cyber security as the anchor. To assist with and accelerate the delivery of this hi-tech business park, the LEP has supported a Growth Bid submission for infrastructure and a bid has been submitted to HCA to increase resource capacity. In addition, we are developing other strands of innovation to support existing businesses to grow and to attract and nurture those looking to relocate or start-up. For example, we recently announced the launch of an ultra-fast broadband pilot, introducing a fibre network in Cheltenham, putting us at the forefront of the digital agenda nationally.<br><br>These and other developments are enshrined in the emerging place strategy – strengthening Cheltenham's economy and positioning ourselves as a market leader in digital and cyber industries.<br><br>In a supplementary question, Councillor Payne suggested that a lot of emphasis was being put on the Cyber Park development and he asked what support the council would be giving to small businesses particularly as a recent report had claimed that 80% of new businesses in Cheltenham were failing in their first year.<br><br>In response the Cabinet Member suggested that the national figure for small businesses was also high and in the order of 60%. The intention was to encourage businesses of all types to set up in Cheltenham. This would be assisted by the development of the Cheltenham Local Plan which would identify potential employment land and the council would also work with the LEP to promote smaller businesses. The council would be working with partners to promote the retail sector and retail tourism was also important to the town. The council would also be looking to suport start-up businesses by identifying suitable small-scale sites which would be ready to go. |
| **15.** | **Question from Councillor John Payne to the Cabinet Member for Development and Safety, Councillor Andew McKinlay** |
| | Could the Cabinet Member please affirm that all the CCTV cameras in Cheltenham are now fully operational? |
| | **Response from Cabinet Member** |
| | The Council is not responsible for *all* CCTV cameras in Cheltenham, but does have an extensive network of cameras in our car parks and also owns and maintains public realm cameras operated by Gloucestershire constabulary.<br><br>For obvious reasons, the Council avoids providing a running commentary on whether or not particular cameras are operational. However, the authority has a very productive relationship with Gloucestershire constabulary in relation to public realm CCTV, which is now being actively monitored from Waterwells in Gloucester.<br><br>New equipment in the CCTV control room means that coverage is much improved and the authority is in the process of procuring new high definition cameras to replace the analogue technology which is now coming to the end of its useful life.<br><br>Officers visited the new police CCTV control room during week commencing 5th |

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| | December and have confirmed that they are now happy with the CCTV coverage in Cheltenham town centre, following the relocation of the facility from Lansdown Road.<br><br>A review of public realm CCTV provision and the associated implementation programme for upgrading is a significant corporate project, which is now subject to regular progress reporting through the Senior Leadership Team.<br><br>In a supplementary question, Councillor Payne was reassured by the response but there had been reports from Gloucestershire Constabulary back in the summer which indicated that over half the CCTV's were malfunctioning. Could the Cabinet Member give reasons why this would not happen again in the future?<br><br>In response the Cabinet Member acknowledged that there had been problems in the summer period but these had now been addressed. The council was responsible for the maintenance of the cameras with the police responsible for their operation. The cameras were old and required a lot of work to maintain them but he was confident that an adequate process was in place for monitoring their operation and maintenance. |

**8. PETITION TO PROTECT THE SERVICES AT RISK BY THE CLOSURE OF OAKLEY NEIGHBOURHOOD PROJECT**

The Mayor referred Members to the covering report for this item and the procedure to be followed. A petition to protect the services at risk by the closure of Oakley Neighbourhood Project was received at the last Council meeting on 17 October 2016.

The petition referred to the services at risk which included Job Club, Food Bank, Client Support/Advice, English and Maths Classes, activities for children and teenagers, counselling services for under 25’s, support dealing with addictive behaviours, access to computers, help with IT and social activities.

As the petition had in excess of 750 signatures it was entitled to a debate at Council

Councillor Colin Hay presented the petition as the petition organiser. He advised that he had chaired a recent meeting of stakeholders which had raised a number of issues with regard to keeping the Oakley centre open and the options going forward. Concerns had been expressed about the impact of cuts in police budgets and the cuts in the universal youth services provided by the county council. The outcomes had been a rise in antisocial behaviour. It was essential that the Cabinet ring fenced any funding which would have gone previously to the Neighbourhood Project in order that the essential work for all parts of the community could be continued.

In the absence of the Cabinet Member, the Leader responded on behalf of the Cabinet. He confirmed that a temporary caretaker manager had been put in place until the end of March to ensure the centre could stay open. The council were maintaining as many services as practical and he thanked CBH for their contribution and Councillor Hay for chairing the stakeholder meeting. He agreed that cuts by the police and in youth services had had a knock-on effect. Cabinet

were committed to maintaining the level of grant previously given to the neighbourhood project and would use this to lever in other resources wherever possible. A report would be coming back to Council in February. He referred Members to the recommendations in the report which had been circulated.

A number of Members spoke in support of the recommendations and cited examples such as the Aston project where early interventions with young people could have a very positive effect and save costs in the long run. Springbank was cited as another example where a reduction in police presence had raised public concern and there had been an increase in antisocial behaviour. Councillor Baker, as chairman of the Cheltenham Football Club, thought the council must do everything it can to help poorer families at a local level and he offered the help of the club in supporting local activities where they could. A Member suggested that other neighbourhood groups were worried because of the situation at Oakley and would welcome reassurance that these groups are sustainable going forward. They suggested that knock-on effects from the reductions in youth services should be scrutinised. Another Member felt that teenagers were the big challenge as this council were not in a position to fund youth work.
Members emphasised the importance of community events in promoting community cohesion. Councillor Rowena Hay, as the ward Member for Oakley, said that many social activities had been organised which had been very well attended and involved whole families. These events also provided a valuable information gathering opportunity where residents who would not normally respond to consultations could give their views in a more comfortable community setting.

Councillor Colin Hay thanked Members for their responses and upon a vote the recommendations were agreed unanimously.

**RESOLVED that the outcomes of work undertaken to date in connection with the petition be noted and a further update to come back to the next Council meeting in February 2017.**

**9. HOUSING REVENUE ACCOUNT NEW BUILD-GARAGE SITE REDEVELOPMENTS AND THE USE OF RIGHT TO BUY RECEIPTS**

The Cabinet Member Housing introduced the report and explained that in March 2015 Cabinet resolved that the authority sought bids from contractors to build new homes across Cheltenham on a number of garage sites. He emphasised that since the council had started new build some 170 homes had been built under different ownership models. This report sought approval to enter into a JCT Design and Build Contract with J Harper and Sons with Total Scheme Costs not to exceed £1, 772, 000. The scheme would deliver up to twelve new homes on three HRA garage sites providing up to 12 homes comprising a range of house types as follows : 6 x 3 bed 5 person dwellings; 2 x 2 bed 3 person flats and 4 x 1 bed 2 person flats. Planning permission was granted for the redevelopment of the sites on 21 July 2016. The likely start date on site would be April 2017 with completion anticipated by summer 2018.

The Cabinet Member wished to put on record his thanks to all those who had been involved in developing these complex brownfield sites including Cheltenham Borough Homes and Onelegal.

Members welcomed the report and were encouraged by the proposed development. They made the following comments :

- This was an excellent use of derelict, brownfield sites and of Right to Buy receipts providing valuable social housing.
- The quality of build to date had been of a very high standard.
- Consultation in some areas had not been as thorough as expected so in some cases support from neighbouring residents was lacking. However, in other areas consultation had been second to none with regular letter drops, public meetings, meetings with the site officer and consultation with ward Members. The Cabinet Member Housing undertook to follow up with CBH where consultation had been perceived to be poor.
- It was asked whether the council could take such developments further in terms of encouraging private owners of derelict sites to sell their property to Cheltenham Borough Homes rather than be faced with enforcement and the land attractive to anti social behaviour and flytipping. This would also make a contribution to housing people. In response the Cabinet Member Housing explained that there was a funding cap imposed on the authority by central government which did not provide the council with much leeway in purchasing properties on the open market.

**RESOLVED (unanimously) THAT**

1. **Up to £1,772,000 be allocated for the construction of up to twelve new dwellings.**

2. **It be noted that the Total Scheme Costs of £1,772,000 (broken down in further detail in exempt Appendix 3) will be funded by circa £531,000 of RTB receipts with the balance funded by the most appropriate combination of the other funding streams noted within the report – this decision being delegated to the Section 151 Officer in accordance with Financial Rules B7 and B8.**

3. **The Authority source loan finance of up to £1,200,000 from the Public Works Loan Board to be used for the construction of twelve new dwellings.**

## 10. WASTE AND RECYCLING SERVICE REDESIGN AND ROUTE OPTIMISATION

The Cabinet Member Clean and Green Environment introduced the report and wished to put on record his thanks to officers, the Joint Waste team, Ubico and the South Somerset waste partnership for their input in the work which had been undertaken to assess and shortlist the waste and recycling service options available and the consultation work completed to gauge residents support. He also thanked Members for their support in promoting the consultation and the public for responding in such high numbers. He believed that the proposed solution in purchasing new vehicles replacing those approaching the end of their usable life, would provide another opportunity to improve services.

The Cabinet Member said that the key messages received from residents from the consultations were as follows :

- Members of the public were broadly satisfied with the service; they liked recycling and were keen to do more. This was why it was now being proposed to include mixed plastics and heavy cardboard.
- The majority of residents (60%) who responded to the consultation favoured option 2a as being the preferred waste and recycling service option for Cheltenham. This was weekly food collection, with fortnightly chargeable garden waste, fortnightly refuse and with the addition of brown corrugated cardboard and plastic pots, tubs and trays.

In terms of route utilisation the Cabinet Member stated that there had been a number of large scale property developments during the last 5 years which had increased the total property numbers and diluted the efficiency of the collection service. With more developments to come, a routes optimisation exercise would have to be undertaken. With the arrival of the new vehicles and new materials to be recycled this would make the service more efficient and more reliable. He would be requesting the support of Members in informing residents of the necessary changes to the collection day which would be inevitable once the routes were defined.

The Cabinet Member informed Council that Cabinet had agreed to set up a Cabinet Member Working Group to oversee the next phase of the project. A cross party sounding board was in his view essential in moving forward. He then informed Members that if approved today the first part of ordering the new vehicles would be completed as a matter of urgency before Christmas.

The following questions were raised by Members and responses given by the Cabinet Member :

- When asked what further investigations had been done to include more recycling in the future given the new vehicle fleet, the Cabinet Member stated that recycling boxes would be retained and cost would be carefully monitored. It was hoped that textile recycling could be included in the future, this will be costly but was high on the agenda. There was a clear desire to recycle a wider range of materials.
- Capability of the new fleet to go down narrow streets - acknowledging the difficulty of certain streets in the borough, the Cabinet Member confirmed that there would be a mixed range of vehicles in the new fleet. It was also hoped that there would be a sufficient number of spare vehicles. He also advised that the Joint Waste Team was working with Highways to discuss instances where for example the vehicles could stop to collect on double yellow lines.
- Houses of Multiple Occupation in terraced areas/flats where it was difficult to get recycling right - the Cabinet Member stated that this was the second phase of the project but work was ongoing in terms of identifying the range of material. Where Houses of Multiple Occupancy (HMOs)/CBH flats were not presenting waste properly the aim was to put an incentive in place to present it in the right way. It was important that those in HMOS received the right information, and assistance from CBH and landlords was required to see how the good work already being done could be extended.

- Technology on vehicles (cameras) it was recognised that real time information coming back to customer services was very useful and the question was raised as to whether the new vehicles would incorporate such or even more advanced technology. The Cabinet Member confirmed that cameras would still be on vehicles and stated that it was a rare event that operatives were acting incorrectly but less rare was when motorists drove round closely to vehicles and/or mounted pavements. The cameras would assist in helping with that and the compensation claims Ubico faced.
- Recycling of tetrapaks – this was being kept under constant review acknowledging that there was only one site in the town which could be used for this purpose. He emphasised the cost of recycling tetrapaks as they consisted of 4 different materials. To make it cost effective volumes would therefore have to increase.
- Retaining the current recycling boxes would provide flexibility in terms of what materials could be collected and what materials could be collected in future.
- Clearing up recycling spillages on to the roadside after collection - the Cabinet Member emphasised that box lids and litter on the street after collections was not always down to the operative. He hoped that recycling rates would increase so that more boxes could be ordered and he also hoped that as part of the service redesign lids alone could be ordered so replacements could be issued where they had been lost or damaged. He highlighted that the new vehicles would make it easier for operatives to collect from boxes and said that they also contained the waste much better than the existing fleet.
- Black plastic – this was very difficult to recycle and it would be kept under review as to whether this could be collected in the future.
- Ubiquitous sensors on vehicles could detect potholes-opportunity to work with a company to help prevent road defects-Cabinet Member said that the council would work with the Joint Waste Committee and Ubico to see what technology could be bolted on to the vehicles; this would be investigated further.
- The new vehicle fleet would be diesel, electric technology was not yet available.
- A request was made to improve the appearance and maintenance of recycling skips in Bath Road.
- Volunteers to promote recycling among neighbourhoods would be welcomed.
- Cllr Babbage was nominated as the Conservative member of the Cabinet Member working group

The Cabinet Member Clean and Green Environment commended Ubico staff for the fantastic job they did for the town which was reflected in the high satisfaction levels in the service. He welcomed the fact that most people wanted the opportunity to recycle more and to that end was pleased that cardboard and plastics could now be included. He highlighted that this quarter, 50 % of total waste had been recycled. He said that the door was now closed on having a commingled service as a result of the consultation but acknowledged that the council had a duty to provide the best possible solution to residents.

Finally, he requested support for the second phase of the service redesign in terms of route reutilisation and he would be seeking Members' support in promoting the service.

**RESOLVED (unanimously)**

**To approve the finances to support option 2a, and following the necessary tender process, an order be placed for new recycling collection vehicles.**

**11. TREASURY MID-TERM REPORT 2016/17**

The Cabinet Member Finance introduced the report and reminded Members that the council operated a balanced budget. She explained that part of the treasury management operation ensured that the cash flow was adequately planned with surplus monies invested in low risk counterparties, another important function was the funding of the capital plans assessing and ensuring that the borrowing needs can be met in order to fund the capital programme. The treasury advisers had set out an economic update for the first six months as outlined in paragraphs 2.1 to 2.6 of the report.
The Cabinet Member wished to thank officers and Capita, the council's treasury advisers, and was pleased to report that the outturn position for 2016/17 was anticipated to be above budget.

**RESOLVED (unanimously)**
**To note the contents of the summary report of the treasury management activity during the first six months of 2016/17.**

**12. COUNCIL TAX SUPPORT SCHEME 2017/18**

The Cabinet Member Finance introduced the report and explained that up to April 2013 council tax benefit was fully funded by government. In April that year government provided the council with 90 % but the council maintained the full 100 % funding with the 10 % shortfall funded by reducing council tax benefits on empty properties.

She went on to explain that in 2014/15 government stopped separately identifying their contribution and left it to local authorities to continue or not. She was pleased to say that this council had continued to support those residents that were on low working incomes or retired on low pensions. She reported that up until September 2016 there were 4211 working age and 2710 pension age customers helped by this scheme.

The Cabinet Member stated that the majority of welfare cuts since 2013 had been targeted at the working age group. Changes to the universal credit go live date had been pushed back to 2018 for all new claims and the new benefit cap for single people for couples and lone parents came into effect on 7 November and a limit on child premiums would come into effect in April 2017.

She reported that a cut to the maximum award was considered but for the reasons outlined above she requested that the council continued to support the scheme at 100 % for 2017/18 as per the recommendations.

Members were pleased that the council was in a position to continue to support this particular group of people as many other authorities had not taken the same decision and the council's approach was deemed to be 'morally right' at this time in the light of a tightened benefit cap and the introduction of universal credit. The people affected were finding it very difficult to make ends meet and a cut would be particularly punitive.

**RESOLVED (unanimously) THAT**

**the working age council tax support scheme remain unchanged for 2017/18, other than any annual uprating of premiums, allowances and non-dependant deductions.**

**13. INVESTMENT PROPERTY PORTFOLIO**

The Cabinet Member Finance introduced the report which set out proposals to increase investment in property in response to the financial pressures to increase revenue and to stimulate and encourage business growth and sustainable development by investing in sites for economic and regeneration purposes.

She reported that an initial allocation of £10 million in the Capital Programme was proposed for approval by Council and the report detailed the criteria for investment, the typical options available, the governance, and the available options for financing. The report also outlined the decision making process which utilized the Property Acquisition Assessment Group

The Cabinet Member informed Members that the Asset Management Working Group (AMWG) had considered this report and gave their support. Should the report be approved by Council the group would have a key role to play on any acquisitions proposed prior to any formal decisions as set out in appendix 2 of the report.

The Council had aspirations to grow its already successful investment property portfolio with a view to generating much needed revenue support as set out in 4a of the approved Medium Term Financial Strategy.

Cheltenham was uniquely placed to grow, sustaining and growing Cheltenham's economic and cultural vitality was one of the key outcomes set out in the Corporate Strategy. The property investment strategy would aim to support this by focusing initially on investments within or in close proximity to the Borough of Cheltenham which would help secure existing or increase business rates income.

The following questions/points were raised by Members and responses given by the Cabinet Member :

- The Cabinet Member confirmed that there would be meaningful consultation with the Property Acquisition Assessment Group and Group Leaders and Asset Management Working Group. She highlighted that purchases over £5m would, in any event, be subject to Council approval. Cabinet could currently purchase property at up to £0.5 million.

- When asked if there were any other examples of other authorities pursuing property investments the Cabinet Member referred to an officer visit to Eastleigh Borough Council. She also made reference to the council's long standing investment in Regent Arcade

In the debate that ensued Members made the following comments :

- They supported the proposals believing it was a good way to future proof income providing that such investments were sound.

- A Member believed it was important to be clear why it would be purchasing a particular property, separating operational property from investment property. It should also be prepared to act as ruthlessly as the private sector.

- It was important that the decision making process was robust and notice was given in advance.

- There could be scope for using the "overview" function of Overview and Scrutiny more as this had often been overlooked. The Cabinet Member Finance said that in most cases it would be necessary to act quickly and with the associated commercial sensitivities.

- Members recognised the decline in investment income which had dropped dramatically with low interest rates. Having all the available information in terms of clear facts and figures was essential before any potential purchase.

- There may be more opportunity from the purchase, including collective use so the rules on investment should not be too tight.

- The role of housing on brownfield sites was highlighted. There was a value in investing in property which provided necessary accommodation for people in the town.

- It was important to acquire the right sort of commercial property which could provide the council with an important revenue stream. It was also important to consider the property portfolio and funds were available to kick start innovative projects to support companies were a resounding success

**RESOLVED (unanimously) THAT**

1. **£1 million from unapplied capital receipts be allocated to pump-prime a property investment fund, supplemented by £9m of prudential borrowing, (i.e. total allocation of £10m) subject to**

**using the option appraisal process at Appendix 2 and the criteria as set out in para 6.1 of this report.**

2. **£200k from unapplied capital receipts be allocated to fund external advisers and pre-acquisition costs.**

3. **A minimum of 50% of all future asset disposal proceeds be ring-fenced to enhance the Council's land and asset portfolio.**

4. **Cabinet, in consultation with the Asset Management Working Group and the Chairman of Overview and Scrutiny Committee, be authorised to approve investments in commercial property up to £5m per transaction.**

**14. REPORT OF THE INDEPENDENT REMUNERATION PANEL**

The Democratic Services Manager introduced the report of the panel. She explained that the panel had not carried out a full review this year but had been convened to consider recommendations arising from the review by internal audit and the level of increase of allowances for April 2017 onwards. In particular the IRP had noted Council's ongoing preference to link any future increases to the local government pay settlement and were happy if Council wanted to adopt this alternative index in the future. On that basis the panel were proposing a 1% increase to the Basic Allowance, SRAs and the civic allowances and the recommendations were set out in the report.

The Council was required to consider the recommendations and if acceptable to resolve to adopt them. If the Council were to reject the recommendations, the current scheme would remain in place.

The Leader thanked the IRP for their report and proposed to accept the recommendations. Although he understood the panel's rationale for originally linking the basic allowance to the average earnings figure in the South West, he felt the link to staff pay rises was appropriate as he would never be in a position to support a recommendation which gave an increase to Members higher than that proposed for staff. It was important to maintain the value of the Members Allowances so that people would continue to be willing to stand for Councillor and take on additional responsibilities and therefore he supported the recommendations in the report.

In response to a question, the Democratic Services Manager confirmed that one member was currently not taking their full allowance and if any Member wished to not receive any increase they could notify Democratic Services who would advise payroll to make the necessary adjustment.

A Member spoke in support of the recommendations and felt that Members were in a difficult position when supporting recommendations of the panel and aligning it to the officers' pay settlement was the least worst option. He reminded Members that if they did not want to take all of their allowance they could donate some of their allowance to the Mayor's charities or a charity of their choice under the Give as you Earn scheme.

Other Members spoke in support of the proposals and felt it was the most cost effective way in the light of the tough budgetary decisions facing the council.

Upon a vote the recommendations were carried
Voting For:30 with 3 abstentions

**RESOLVED (unanimously) THAT**

1. **the Basic Allowance payable to all Councillors be increased by 1% from April 2017 in line with the proposed increase to staff.**
2. **the level of all SRAs be increased by 1%.**
3. **the allowances for Mayor and Deputy Mayor are increased by 1%**
4. **the revised Members Allowance Scheme as set out in Appendix 1 of the IRP report be adopted including the change to future indexation**
5. **it be noted that the next full review required by legislation will start in September 2018 reporting to Council in December 2018 with an intervening review each September as detailed in the scheme.**
6. **The Democratic Services Manager be authorised to implement any necessary changes to the scheme of allowances and make any necessary changes to the Council's constitution.**

**15. LICENSING CODE OF CONDUCT (PROBITY IN LICENSING)**

The Cabinet Member Corporate Services introduced the report. From his experience as the previous chair of the Licensing Committee there were many areas of potential conflicts of interest for Members in the area of Licensing and this document provided valuable advice and guidance.

Councillor Wendy Flynn as the current chair of Licensing Committee advised that there had been no major changes to the document but it had been tidied up in some areas and she was happy to recommend it to Council.

Upon a vote it

**RESOLVED (unanimously) THAT the revised Licensing Code of Conduct (Probity in Licensing) attached at Appendix 1 be adopted to be included as Part 5E of the Council's Constitution.**

**16. AGREEMENT TO LOAN TO SUPPORT THE CONSTRUCTION OF AN ANNEX AT ST. MARGARET'S HALL**

The Cabinet Member Finance introduced the item and reminded Members that in July this year Council considered a report requesting an in principle loan of £50k to assist St Margaret's Hall user group to build a new annexe which was agreed subject to the user group securing all the necessary funds to cover the cost of the whole scheme. She reported that the user group had now confirmed

that they had all the funds in place as set out in section 4 and thus had met the requirement 3. The Cabinet Member explained that the proposed loan would be an annuity loan, for a term of 15 years and at an interest rate of 3 % per annum. Capital and interest would be repayable every six months as part of the loan agreement.

Members supported the proposal and highlighted the vital service the Hall provided to people of the area. The loan would address the capacity issues the Hall was facing.

**RESOLVED (unanimously) THAT**

**an unsecured loan of £50,000 be authorised to St. Margaret's Hall Users Group for the purposes of enabling the construction of the proposed annex upon terms and conditions as the Director of Resources considers reasonable, and to authorise the Borough Solicitor to conclude such documents as she considers necessary or desirable to protect the Council's position.**

## 17. NOTICES OF MOTION

**Motion A: Public participation in Council**
Proposed by Councillor Louis Savage
Seconded by Councillor Diggory Seacome

*"This Council seeks to be as open, accessible and accountable as possible to the people of Cheltenham. It aims to actively promote public participation in future council meetings, including facilitating attendance in the public gallery, and receiving questions and petitions from members of the public.*

*Council will:*
*-Ensure members of the public receive answers to questions 1 working day prior to Council meetings*
*-Record the number of members of the public present during council meetings, and include this in the minutes*
*-Ensure available Multimedia is utilised effectively in Full Council to ensure proceedings and discussions are accessible and intelligible to people in the public gallery"*

In proposing the motion, Councillor Savage suggested that questioners currently had limited time to digest the answers given and to prepare their supplementary questions which in practice had the most clout. He was keen to use the full range of multimedia facilities and cited the Planning Committee as a good example of where they were used to help explain aspects of the meeting to people in the chamber and in the public gallery. He was aware that some items in Council could be quite dry or difficult to follow in terms of the procedures and he felt the use of the OHP could help people to keep up.

The Cabinet Member Corporate Services, Councillor Whyborn welcomed the motion and was keen to reply positively to it. He supported the need for more

openness in politics and he referred to the Mayor's earlier proposals for improving the process of public and Member questions.

He proposed the following amendment which was seconded by Councillor McKinlay.

Delete all and replace by:-
"*This Council seeks to be as open, accessible and accountable as possible to the people of Cheltenham. It aims to actively promote public participation in future council meetings, including facilitating attendance in the public gallery, and receiving questions and petitions from members of the public.*

*Council will:*
*-Continue to ensure members of the public receive answers to questions during the morning prior to Council meetings, with the aim to reply by 10 am prior to a 2:30 pm meeting.*
*-Maintain adequate paperwork to the public gallery to meet anticipated attendance.*
*-Explore the costs and practicalities to use Multimedia effectively in Full Council to enhance accessibility of the meetings to both the public gallery and beyond.* "

In proposing the amendment, he said it was not practical for the deadline for responses to be brought back by 24 hours. The timeline for preparing responses had already been reduced by 24 hours in 2012 in order to give the public and Members more time to prepare their questions after the publication of the agenda and he did not want to reverse that decision. The proposal to have questions available by 10 a.m. on the day of the meeting should give more than enough time to clarify any issues with the responses given. The aim was not an opportunity to prepare a particular difficult supplementary question.

He saw no added value in counting the number of people in the public gallery.

He felt that there was a particular problem with Members having to stand to speak and in order to demonstrate this and with the Mayors indulgence he sat down for the rest of his speech. He was keen to progress the use of multimedia and he advised members that in June this year a company called public I had attended to give a presentation on web casting facilities. There was a significant cost involved typically £12-14 K per annum and significant setup costs. He had requested officers to investigate whether any cheaper alternatives were available. He advised that he had sat up in the public gallery for the presentation before Council and he had been able to hear very clearly.

In a point of order Councillor Babbage questioned whether the amendment reversed the original motion and therefore was invalid.

The Head of Legal Services advised that he was satisfied that the amendments satisfy the terms of the constitution set out in the Council Procedure rules in 13.12 of the Constitution.

The Mayor advised that during her Term of Office she preferred Members to stand up as a mark of respect for herself as Mayor, the Mace and the Queen.

In seconding the motion Councillor McKinlay didn't disagree with the aim to make the Council meeting more accessible to the public, but pointed out that people tended to come when there was an issue they were deeply concerned about. Although bringing forward the deadline for responses by 24 hours may at first sound reasonable it was impractical. Some of the questions were very technical and needed input from officers and the Cabinet Members needed to ensure all the answers were coherent. The risk was if the preparation time was shortened that Members or the public would then get holding responses rather than the full technical answer they were looking for. The options for using multimedia was something that could be looked at more closely.

Other Cabinet Members supported the current timescales regarding questions citing the need to properly research the answers. It was highlighted that in other councils Members asking supplementary questions were frequently provided with a holding response promising a written reply which was something this council wanted to avoid.

Councillor Savage as the proposer of the original motion accepted the amendment and therefore this became the substantive motion.

A Member was concerned that at the last meeting the public did not get proper answers to their questions and if they asked their question again they would lose their right to a supplementary. He suggested there should be a mechanism for questioners going back to the Cabinet Member before the meeting if they felt their question had not been answered so that they would still have an opportunity to ask a supplementary question at the meeting.

Several Members referred to the incidents at the last meeting during public and member questions. One Member suggested that it must be impressed upon members of the public in the gallery that they were not allowed to participate in the meeting. It was noted that there was a hearing loop which worked very effectively both in the chamber and in the gallery for those who are hard of hearing. Another Member highlighted that generally the public come to Council meetings when they felt passionate about a particular issue. In this case it was more appropriate to control any interruptions rather than seek to stop them entirely. It was also important for Members to respect each other and the process for questions and keep their supplementary questions and the responses concise.

Several Members referred to the practical issues arising from standing up to speak and Members of the public attending previous meetings had indicated that they could not hear clearly in the gallery. Whilst respecting the current Mayor’s preference for standing there was a suggestion from a Member that there could be a trial at a future meeting where standing orders could be suspended to allow Members to remain seated whilst addressing the Council. If this made it easier for the public to hear that should be a priority. There was also no requirement to stand up at other meetings such as Planning and Licensing committees. A former Mayor advised Members that when he had first been on the council 40 years ago, there were no microphones and Members had to use their voice and learn how to project it. He suggested that this could be an area of further training for Members. Other Members had referred to sitting down to speak in other committees but he pointed out that the mace was not present at those meetings and he personally would feel uncomfortable in

changing the current tradition for Council.

A member suggested that the current sound system in the chamber had become an embarrassment and the system was not fit for purpose. He urged that when the council move to a new building the optimum use of new technology was made when considering the facilities available. It was suggested that a Cabinet Member Working group could be set up to meet on an annual basis to review the progress in technology and how it can be utilised at council meetings.

Members welcomed the use of OHP and felt the introduction at this particular meeting had been useful. Webcasting was also being used very successfully in other councils and at GCC. A Member thought that if introduced it should be used consistently across all committees and would provide a permanent record of the exact words that had been said so that Members could be held to account.

The proposer Councillor Savage thanked Members for a very interesting debate and he hoped that the council would now be able to enact some simple cost neutral measures to improve public participation in the meeting.

Upon a vote on the motion as amended was carried unanimously.

The Mayor announced that the Council meeting had now been in session for four hours and upon a show of hands Members indicated that the meeting should continue.

**Motion B – Remembering Srebrenica**
Proposed by: Councillor Colin Hay
Seconded by: Councillor Paul McCloskey

*"This Council:*

- *Notes that 2016 is the twenty-first anniversary of the Srebrenica genocide in Bosnia and Herzegovina, which saw over 8,000 Muslim men and boys killed by Serbian nationalist forces.*
- *Notes that in 2009 the European Parliament passed a resolution that 11 July should be recognised as the day of commemoration of the Srebrenica genocide all over the EU; and in 2015 urged the development of educational and cultural programmes that promote an understanding of the causes of such atrocities and raise awareness about the need to nurture peace and to promote human rights and interreligious tolerance.*
- *Applauds the work of those involved in the pursuit of justice for the victims and their surviving relatives, including the International Commission of Missing People (ICMP) and the Mothers of Srebrenica, whose courage and humility in the face of unthinkable horror is an inspiration to us all.*
- *Commends the work of the charity, Remembering Srebrenica, in raising awareness of this tragic and preventable genocide and working in communities across Britain to help them learn the lessons of Srebrenica.*

*The Council resolves to:*

- *Support Srebrenica memorial events in July each year in Cheltenham as part of the UK-wide Remembering Srebrenica Memorial Week.*

- *Support the work of Remembering Srebrenica in communities across in Cheltenham Borough Council to learn the lessons from Srebrenica to tackle hatred and intolerance to help build a better, safer and more cohesive society for everyone. "*

In proposing the motion, Councillor Hay explained that he had been part of a delegation visiting Bosnia where he had been made very aware of the impact of the genocide that had taken place and he had been very moved by what he had seen.

He concluded that following on from the council motion it was important to understand the classifications of genocide and hate crime must not go unchallenged. He asked for Members support in the remembrance events and in learning lessons from the atrocities that had happened.

Members all spoke in support of the motion. They had hoped that genocide had been consigned to the history books after the second world war but clearly it was still happening 21 years ago and is still happening today. A Member suggested that Europeans were quick to remember but too slow to act and they must be able to take steps to stop these atrocities happening - mass graves were being discovered in Syria at this moment. The ten steps to genocide were important and people should question themselves as to whether they may be taking the first step in terms of how they refer to people of different ethnicities. The media also had a part to play in how they reported hate crime and the Member challenged the local media to publish these 10 steps. It was important that this history was taught in schools and should be remembered.

In seconding the motion, Councillor McCloskey saw this as an opportunity for people to make a commitment that they did not want this to happen again. It was not just about Members supporting the commemorative events but asking them to interact with their communities. He had personal experience of meeting refugees and hearing their personal accounts had been very moving. He finished by referring to Martin Niemöller, a prominent Protestant pastor who emerged as an outspoken public foe of Adolf Hitler and spent the last seven years of Nazi rule in concentration camps.

He is perhaps best remembered for the quotation:

First they came for the Socialists, and I did not speak out—
Because I was not a Socialist.
Then they came for the Trade Unionists, and I did not speak out—
Because I was not a Trade Unionist.
Then they came for the Jews, and I did not speak out—
Because I was not a Jew.
Then they came for me—and there was no one left to speak for me.

In his summing up Councillor Hay thanked Members for their support. He agreed that the United Nations and Europe had let down these nations and their mandate was very much restricted. Genocide was still happening now and he was not seeing the international response he would have liked and politicians at a national level needed to understand the level of public feeling.

Upon a vote on the motion was carried unanimously.

**18. TO RECEIVE PETITIONS**

There were no petitions received.

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

There were no urgent items.

Chris Ryder
**Chairman**

# Cheltenham Borough Council

## Cabinet – 7th February 2017

## Council - 10th February 2017

## Treasury Management Strategy Statement and Annual Investment Strategy 2017/18

| | |
|---|---|
| **Accountable member** | **Cabinet Member Finance, Councillor Rowena Hay** |
| **Accountable officer** | **Section 151 Officer, Paul Jones** |
| **Accountable scrutiny committee** | **Scrutiny** |
| **Ward(s) affected** | **None** |
| **Key Decision** | **Yes** |
| **Executive summary** | In accordance with best practice, the Council has adopted and complies with the CIPFA Code of Practice on Treasury Management in the public services. To comply with the code, the Council has a responsibility to set out its Treasury Management Strategy Statement for borrowing and to prepare an Annual Investment Strategy for council approval prior to the start of a new financial year. |
| **Recommendations** | Treasury Management Panel has recommended that Cabinet/Council approve the attached Treasury Management Strategy Statement, Annual Investment Strategy for 2017/18 at Appendix 2, 2017/18 Lending list at Appendix 3 and MRP policy statement for 2016/17 and 2017/18 at Appendix 4, including :<br>• **The general policy objective 'that Council should invest prudently the surplus funds held on behalf of the community giving priority to security and liquidity'.**<br>• **That the Prudential Indicators for 2017/18 including the authorised limit as the statutory affordable borrowing limit determined under Section 3 (1) Local Government Act 2003 be approved.**<br>• **Revisions to the Council's lending list and parameters as shown in Appendix 3 are proposed in order to provide some further capacity. These proposals have been put forward after taking advice from the Council's treasury management advisers Capita Asset Services and are prudent enough to ensure the credit quality of the Council's investment portfolio remains high.**<br>• **The use of Repo/Reverse Repo is accepted as a form of securitised lending.** |

- **For 2016/17 and 2017/18 in calculating the Minimum Revenue Provision (MRP), the Council will apply a modified Option 1 in respect of supported capital expenditure to repay the debt in equal instalments over 35 years and Option 3 in respect of unsupported capital expenditure, adjusted from 2017/18 by the use of capital receipts to repay debt associated with capital loans as per paragraph 24 in Appendix 4.**

| | |
|---|---|
| **Financial implications** | All financial implications are noted in the report.<br><br>**Contact officer: Andrew Sherbourne, andrew.sherbourne@cheltenham.gov.uk, 01242 264337** |
| **Legal implications** | As detailed in the report.<br><br>**Contact officer: Peter Lewis**<br><br>**peter.lewis@tewkesbury.gov.uk, 01684 272695** |
| **HR implications (including learning and organisational development)** | None arising directly from this report.<br><br>**Contact officer: Julie McCarthy,**<br><br>**julie.mccarthy@cheltenham.gov.uk, 01242 264355** |
| **Key risks** | As noted in Appendix 1. |
| **Corporate and community plan Implications** | The purpose of the strategy is to improve corporate governance, a key objective for the Council. |
| **Environmental and climate change implications** | None arising directly from this report. |

## 1. Background

1.1 The CIPFA Code of Practice for Treasury Management in Public Services and the Prudential Code require local authorities to determine the Treasury Management Strategy Statement and the Prudential Indicators on an annual basis. The Treasury Management Strategy Statement also incorporates the Annual Investment Strategy as required under the CLG's Investment Guidance.

1.2 For the purposes of the Code, CIPFA has adopted the following as its definition of treasury management activities:

*"the management of the organisation's investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks."*

1.3 The Council will create and maintain, as the basis for effective treasury management:

- A Treasury Management Strategy Statement, stating the policies, objectives and approach to risk management of its treasury management activities

- Suitable Treasury Management Practices (TMP's) setting out the manner in which the Council will seek to achieve those polices and objectives, and prescribing how it will manage and control those activities.

1.4 The local authorities (Capital Finance and Accounting) (England) Regulations 2003, which came into force on 1st April 2004, include provisions relevant to investments. These regulations, together with amendments subsequently made to them (S.I No.534), determine the nature of specific investments, and how they should be treated/accounted for by a local authority. Formal guidance was revised and issued by the Communities and Local Government (CLG) in 2010.

1.5 The Treasury Management Strategy Statement and Annual Investment Strategy at Appendix 2, state the overriding principles and objectives governing treasury management activity. As an integral part of that Statement, the Council includes the preparation of Treasury Management Practices which set out the manner in which the Council will achieve those principles and objectives prescribing how it will manage and control those activities.

1.6 The general policy objective of the Annual Investment Strategy is that:

**'the Council should invest prudently the surplus funds held on behalf of the community giving priority to security and liquidity'.**

The Council is responsible for its treasury decisions and activity. No treasury management activity is without risk. The successful identification, monitoring and control of risk is an important and integral element of its treasury management activities.

1.7 The strategy allows sufficient flexibilities and delegations to avoid the need for a formal variation, other than in the most exceptional circumstance.

## 2.0 Consultation

2.1 The Council's external treasury advisors, Capita Asset Services, supported the Council in the production of the strategies.

2.2 The strategy is to be approved by the Treasury Management Panel at its meeting on 23rdh January 2017.

| | |
|---|---|
| **Report author** | **Contact officer: Andrew Sherbourne, andrew.sherbourne@cheltenham.gov.uk**<br><br>**01242 264437** |

| | |
|---|---|
| **Appendices** | Appendix 1 – Risk Assessment<br><br>Appendix 2 – Treasury Management Strategy Statement & Annual Investment Strategy 2017/18<br><br>Appendix 3 – Updated Lending list<br><br>Appendix 4 - Annual MRP Statement 2017/18 |
| **Background information** | Section 15(1)(a) of the Local Government Act 2003<br><br>Cheltenham Borough Council Treasury Management Practices |

## Risk Assessment

## Appendix 1

| The risk | | | | Original risk score (impact x likelihood) | | | Managing risk | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **Risk ref.** | **Risk description** | **Risk Owner** | **Date raised** | **I** | **L** | **Score** | **Control** | **Action** | **Deadline** | **Responsible officer** | **Transferred to risk register** |
| | LOBO Loans (£7m) – If the banks choose to exercise their option to recall these loans then CBC would need to have the resources on the day to repay. | Section 151 Officer Paul Jones | 24th January 2015 | 1 | 2 | 2 | Accept | If the loans are recalled the council could take out temporary borrowing which is currently much lower than the rates on these loans. Any capital receipts available could also be used to repay debt. | May 2018 | Section 151 Officer Paul Jones | |

# TREASURY MANAGEMENT STRATEGY 2017/18

## 1. INTRODUCTION

### 1.1 Background

The Council is required to operate a balanced budget, which broadly means that cash raised during the year will meet cash expenditure. Part of the treasury management operation is to ensure that this cash flow is adequately planned, with cash being available when it is needed. Surplus monies are invested in low risk counterparties or instruments commensurate with the Council's low risk appetite, providing adequate liquidity initially before considering investment return.

The second main function of the treasury management service is the funding of the Council's capital plans. These capital plans provide a guide to the investment reduction of the Council, essentially the longer term cash flow planning to ensure that the Council can meet its capital spending obligations. This management of longer term cash may involve arranging long or short term loans, or using longer term cash flow surpluses.

CIPFA defines treasury management as:

> *"The management of the local authority's investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks."*

### 1.2 Reporting requirements

The Council is required to receive and approve, as a minimum, three main reports each year, which incorporate a variety of polices, estimates and actuals.

**Prudential and treasury indicators and treasury strategy** (this report) - The first, and most important report covers:

- the capital plans (including prudential indicators);
- a minimum revenue provision (MRP) policy (how residual capital expenditure is charged to revenue over time);
- the treasury management strategy (how the investments and borrowings are to be organised) including treasury indicators; and
- an investment strategy (the parameters on how investments are to be managed).

**A mid year treasury management report** – This will update members with the progress of the capital position, amending prudential indicators as necessary, and whether the treasury strategy is meeting the strategy or whether any policies require revision.

**An annual treasury report** – This provides details of a selection of actual prudential and treasury indicators and actual treasury operations compared to the estimates within the strategy.

**Scrutiny**
The above reports are required to be adequately scrutinised before being recommended to the Council. This role is undertaken by the Treasury Management Panel.

## 1.3 Treasury Management Strategy for 2017/18

The strategy for 2017/18 covers two main areas:

**Capital issues**

- the capital plans and the prudential indicators;
- the minimum revenue provision (MRP) strategy.

**Treasury management issues**

- the current treasury position;
- treasury indicators which limit the treasury risk and activities of the Council;
- prospects for interest rates;
- the borrowing strategy;
- policy on borrowing in advance of need;
- debt rescheduling;
- the investment strategy;
- creditworthiness policy; and
- policy on use of external service providers.

These elements cover the requirements of the Local Government Act 2003, the CIPFA Prudential Code, CLG MRP Guidance, the CIPFA Treasury Management Code and CLG Investment Guidance.

## 1.4 Training

The increased Member consideration of treasury management matters and the need to ensure officers dealing with treasury management are trained and kept up to date requires a suitable training process for Members and officers. This Council has addressed this important issue by providing training sessions for the Treasury Management Panel members on the subject of Treasury Management.

The training needs of treasury management officers are periodically reviewed.

## 1.5 Treasury management consultants

The Council uses Capita Asset Services, as its external treasury management advisors.
The Council recognises that responsibility for treasury management decisions remains with the organisation at all times and will ensure that undue reliance is not placed upon our external service providers.

It also recognises that there is value in employing external providers of treasury management services in order to acquire access to specialist skills and resources. The Council will ensure that the terms of their appointment and the methods by which their value will be assessed are properly agreed and documented, and subjected to regular review.

## 2. THE CAPITAL PRUDENTIAL INDICATORS 2017/18 – 2019/20

The Council's capital expenditure plans are the key driver of treasury management activity. The outputs of the capital expenditure plans are reflected in prudential indicators, which are designed to assist members' overview and confirm capital expenditure plans.

### 2.1 Capital expenditure

This prudential indicator is a summary of the Council's capital expenditure plans, both those agreed previously, and those forming part of this budget cycle. Members are asked to approve the capital expenditure forecasts:

| Capital expenditure | 2015/16 Actual £000 | 2016/17 Revised £000 | 2017/18 Estimate £000 | 2018/19 Estimate £000 | 2019/20 Estimate £000 |
|---|---|---|---|---|---|
| **General Fund** | 17,897 | 2,954 | 22,908 | 938 | 938 |
| **HRA** | 6,949 | 11,613 | 10,892 | 10,140 | 7,804 |
| **Total** | **24,846** | **14,567** | **33,800** | **11,078** | **8,742** |

Other long term liabilities. The above financing need excludes other long term liabilities, such as leasing arrangements which already include borrowing instruments. The authority has no finance leasing arrangements at present.

The table below summarises the above capital expenditure plans and how these plans are being financed by capital or revenue resources. Any shortfall of resources results in a funding borrowing need.

| Capital expenditure | 2015/16 Actual £000 | 2016/17 Revised £000 | 2017/18 Estimate £000 | 2018/19 Estimate £000 | 2019/20 Estimate £000 |
|---|---|---|---|---|---|
| Total | **24,846** | **14,567** | **33,800** | **11,078** | **8,742** |
| **Financed by:** | | | | | |
| Capital receipts | 4,490 | 4,178 | 6,725 | 1,214 | 939 |
| Capital grants | 393 | 560 | 734 | 500 | 500 |
| Capital reserves | 6,979 | 7,073 | 6,169 | 5,852 | 6,016 |
| 3rd Party Contributions | 234 | 772 | 960 | 400 | 300 |
| Revenue | 0 | 1,984 | 2,831 | 2,969 | 844 |
| **Borrowing need for the year** | **12,750** | **0** | **16,381** | **143** | **143** |

## 2.2 The Council's borrowing need (the Capital Financing Requirement)

The second prudential indicator is the Council's Capital Financing Requirement (CFR). The CFR is simply the total historic outstanding capital expenditure which has not yet been paid for from either revenue or capital resources. It is essentially a measure of the Council's underlying borrowing need. Any capital expenditure above, which has not immediately been paid for, will increase the CFR.

The CFR does not increase indefinitely, as the minimum revenue provision (MRP) is a statutory annual revenue charge which broadly reduces the borrowing need in line with each assets life.

The CFR includes any other long term liabilities (e.g. PFI schemes, finance leases). Whilst these increase the CFR, and therefore the Council's borrowing requirement, these types of scheme include a borrowing facility and so the Council is not required to separately borrow for these schemes

The Council is asked to approve the CFR projections below:

| £000 | 2015/16 Actual | 2016/17 Estimate | 2017/18 Estimate | 2018/19 Estimate | 2019/20 Estimate |
|---|---|---|---|---|---|
| **Capital Financing Requirement** | | | | | |
| **Total CFR** | 85,416 | 83,660 | 98,698 | 96,725 | 94,887 |
| **Movement in CFR** | 11,545 | (1,756) | 15,038 | (1,973) | (1,838) |

| **Movement in CFR represented by** | | | | | |
|---|---|---|---|---|---|
| Net financing need for the year (above) | 24,846 | 14,567 | 33,800 | 11,078 | 8,742 |
| Less MRP/VRP and other financing movements | (13,301) | (16,323) | (18,762) | (13,051) | (10,580) |
| **Movement in CFR** | **11,545** | **(1,756)** | **15,038** | **(1,973)** | **(1,838)** |

## 2.3 Affordability prudential indicators

The previous sections cover the overall capital and control of borrowing prudential indicators, but within this framework prudential indicators are required to assess the affordability of the capital investment plans. These provide an indication of the impact of the capital investment plans on the Council's overall finances. The Council is asked to approve the following indicators:

## 2.4 Ratio of financing costs to net revenue stream

This is an indicator of affordability and highlights the revenue implications of existing and proposed capital expenditure by identifying the proportion of the revenue budget required to meet borrowing costs. It would not be prudent for borrowing costs to be a significant proportion of net revenue either now or in the future. By estimating the ratio for at least the next three years the trend in the cost of capital (borrowing costs net of interest and investment income) as a proportion of revenue income can be seen.

| % | 2015/16 Actual | 2016/17 Revised | 2017/18 Estimate | 2018/19 Estimate | 2019/20 Estimate |
|---|---|---|---|---|---|
| General Fund | 2.77 | 4.02 | 3.93 | 3.88 | 3.91 |
| HRA | 7.77 | 7.91 | 8.10 | 8.20 | 8.31 |
| **Total** | 5.61 | 6.35 | 5.99 | 6.41 | 6.45 |

**2.5 Incremental impact of capital investment decisions on council tax**

This indicator identifies the revenue costs associated with proposed changes to the three year capital programme recommended in this budget report compared to the Council's existing approved commitments and current plans. The assumptions are based on the budget, but will invariably include some estimates, such as the level of Government support, which are not published over a three year period.

**Incremental impact of capital investment decisions on the band D council tax**

| £ | 2015/16 Actual | 2016/17 Revised | 2017/18 Estimate | 2018/19 Estimate | 2019/20 Estimate |
|---|---|---|---|---|---|
| **Council tax - band D** | 1.14 | 0.43 | 1.11 | 0.06 | 0.06 |

**For average weekly housing rents**

| £ | 2015/16 Actual | 2016/17 Revised | 2017/18 Estimate | 2018/19 Estimate | 2019/20 Estimate |
|---|---|---|---|---|---|
| **Housing Rents** | NIL | NIL | NIL | NIL | NIL |

Decisions on annual rent increases are subject to rent restructuring guidelines set by Central Government. As a consequence the Government have indicated that rent levels will decrease by 1% over the next three years. This method has been used to form part of the 30 year HRA Business Plan.

## 3. BORROWING

The capital expenditure plans set out in Section 2 provide details of the service activity of the Council. The treasury management function ensures that the Council's cash is organised in accordance with the the relevant professional codes, so that sufficient cash is available to meet this service activity. This will involve both the organisation of the cash flow and, where capital plans require, the organisation of approporiate borrowing facilities. The strategy covers the relevant treasury / prudential indicators, the current and projected debt positions and the annual investment strategy.

### 3.1 Current portfolio position

The Council's treasury portfolio position at 31 March 2016, with forward projections are summarised below. The table shows the actual external debt (the treasury management operations), against the underlying capital borrowing need (the Capital Financing Requirement - CFR), highlighting any over or under borrowing.

| £000 | 2015/16 Actual | 2016/17 Revised | 2017/18 Estimate | 2018/19 Estimate | 2019/20 Estimate |
|---|---|---|---|---|---|
| **External Debt** | | | | | |
| Debt at 1 April | 58,925 | 65,360 | 64,830 | 79,686 | 78,828 |
| Expected change in Debt | 6,434 | 3,170 | 14,856 | (858) | (974) |
| **Actual debt at 31 March** | **65,360** | **64,830** | **79,686** | **78,828** | **77,854** |
| **The Capital Financing Requirement** | **85,416** | **83,660** | **98,698** | **96,725** | **94,887** |
| **Under / (over) borrowing** | **20,056** | **18,830** | **19,012** | **17,897** | **17,033** |

| **Total investments at 31 March** | | | | | |
|---|---|---|---|---|---|
| Investments | **20,542** | **22,660** | **21,450** | **20,450** | **19,450** |
| Investment change | N/A | 2,118 | (1,210) | (1,000) | (1,000) |

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Within the prudential indicators there are a number of key indicators to ensure that the Council operates its activities within set limits. One of these is that the Council needs to ensure that its total debt, net of any investments, does not, except in the short term, exceed the total of the CFR in the preceding year plus the estimates of any additional CFR for 2017/18 and the following two financial years (shown as net borrowing above). This allows some flexibility for limited early borrowing for future years, but ensures that borrowing is not undertaken for revenue purposes.

The Section 151 Officer reports that the Council complied with this prudential indicator in the current year and does not envisage difficulties for the future. This view takes into account current commitments, existing plans, and the proposals in this budget report.

### 3.2 Treasury Indicators: limits to borrowing activity

**The operational boundary.** This is the limit beyond which external debt is not normally expected to exceed. In most cases, this would be a similar figure to the CFR, but may be lower or higher depending on the levels of actual debt.

| Operational boundary £'000 | 2016/17 Revised | 2017/18 Estimate | 2018/19 Estimate | 2019/20 Estimate |
|---|---|---|---|---|
| Borrowing | 107 | 112 | 110 | 108 |

**The authorised limit for external debt.** A further key prudential indicator represents a control on the maximum level of borrowing. This represents a limit beyond which external debt is prohibited, and this limit needs to be set or revised by the full Council. It reflects the level of external debt which, while not desired, could be afforded in the short term, but is not sustainable in the longer term.

This is the statutory limit determined under section 3 (1) of the Local Government Act 2003. The Government retains an option to control either the total of all councils' plans, or those of a specific council, although this power has not yet been exercised.

The Council is asked to approve the following authorised limit:

| Authorised Limit £'000 | 2016/17 Revised | 2017/18 Estimate | 2018/19 Estimate | 2019/20 Estimate |
|---|---|---|---|---|
| Borrowing | 117 | 122 | 120 | 118 |

### 3.3 Prospects for interest rates

The Council has appointed Capita as its treasury advisor and part of their service is to assist the Council to formulate a view on interest rates. The following table gives the Capita central view.

| | Dec-16 | Mar-17 | Jun-17 | Sep-17 | Dec-17 | Mar-18 | Jun-18 | Sep-18 | Dec-18 | Mar-19 | Jun-19 | Sep-19 | Dec-19 | Mar-20 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Bank rate | 0.25% | 0.25% | 0.25% | 0.25% | 0.25% | 0.25% | 0.25% | 0.25% | 0.25% | 0.25% | 0.50% | 0.50% | 0.75% | 0.75% |
| 5yr PWLB rate | 1.60% | 1.60% | 1.60% | 1.60% | 1.60% | 1.70% | 1.70% | 1.70% | 1.80% | 1.80% | 1.90% | 1.90% | 2.00% | 2.00% |
| 10yr PWLB rate | 2.30% | 2.30% | 2.30% | 2.30% | 2.30% | 2.30% | 2.40% | 2.40% | 2.40% | 2.50% | 2.50% | 2.60% | 2.60% | 2.70% |
| 25yr PWLB rate | 2.90% | 2.90% | 2.90% | 2.90% | 3.00% | 3.00% | 3.00% | 3.10% | 3.10% | 3.20% | 3.20% | 3.30% | 3.30% | 3.40% |
| 50yr PWLB rate | 2.70% | 2.70% | 2.70% | 2.70% | 2.80% | 2.80% | 2.80% | 2.90% | 2.90% | 3.00% | 3.00% | 3.10% | 3.10% | 3.20% |

The Monetary Policy Committee, (MPC), cut Bank Rate from 0.50% to 0.25% on 4th August in order to counteract what it forecast was going to be a sharp slowdown in growth in the second half of 2016. It also gave a strong steer that it was likely to cut Bank Rate again by the end of the year. However, economic data since August has indicated much stronger growth in the second half 2016 than that forecast; also, inflation forecasts have risen substantially as a result of a continuation of the sharp fall in the value of sterling since early August. Consequently, Bank Rate was not cut again in November or December and, on current trends, it now appears unlikely that there will be another cut, although that cannot be completely ruled out if there was a significant dip downwards in economic growth. During the two-year period 2017 – 2019, when the UK is negotiating the terms for withdrawal from the EU, it is likely that the MPC will do nothing to dampen growth prospects, (i.e. by raising Bank Rate), which will already be adversely impacted by the uncertainties of what form Brexit will eventually take. Accordingly, a first increase to 0.50% is not tentatively pencilled in, as in the table above, until quarter 2 2019, after those negotiations have been concluded, (though the period for negotiations could be extended). However, if strong domestically generated inflation, (e.g. from wage increases within the UK), were to emerge, then the pace and timing of increases in Bank Rate could be brought forward.

Economic and interest rate forecasting remains difficult with so many external influences weighing on the UK. The above forecasts, (and MPC decisions), will be liable to further amendment depending on how economic data and developments in financial markets transpire over the next year. Geopolitical developments, especially in the EU, could also have a major impact. Forecasts for average investment earnings beyond the three-year time horizon will be heavily dependent on economic and political developments.

The overall longer run trend is for gilt yields and PWLB rates to rise, albeit gently. It has long been expected that at some point, there would be a start to a switch back from bonds to equities after a historic long term trend over about the last twenty five years of falling bond yields. The action of central banks since the financial crash of 2008, in implementing substantial quantitative easing purchases of bonds, added further impetus to this downward trend in bond yields and rising prices of bonds. The opposite side of this coin has been a rise in equity values as investors searched for higher returns and took on riskier assets. The sharp rise in bond yields since the US Presidential election, has called into question whether, or when, this trend has, or may, reverse, especially when America is likely to lead the way in reversing monetary policy. Until 2015, monetary policy was focused on providing stimulus to economic growth but has since started to refocus on countering the threat of rising inflationary pressures as strong economic growth becomes more firmly established. The expected substantial rise in the Fed. rate over the next few years may make holding US bonds much less attractive and cause their prices to fall, and therefore bond yields to rise. Rising bond yields in the US would be likely to exert some upward pressure on bond yields in other developed countries but the degree of that upward pressure is likely to be dampened by how strong, or weak, the prospects for economic growth and rising inflation are in each country, and on the degree of progress in the reversal of monetary policy away from quantitative easing and other credit stimulus measures.

PWLB rates and gilt yields have been experiencing exceptional levels of volatility that have been highly correlated to geo-political, sovereign debt crisis and emerging market developments. It is likely that these exceptional levels of volatility could continue to occur for the foreseeable future.

The overall balance of risks to economic recovery in the UK is to the downside, particularly in view of the current uncertainty over the final terms of Brexit and the timetable for its implementation.

Apart from the above uncertainties, downside risks to current forecasts for UK gilt yields and PWLB rates currently include:

•Monetary policy action by the central banks of major economies reaching its limit of effectiveness and failing to stimulate significant sustainable growth, combat the threat of deflation and reduce high levels of debt in some countries, combined with a lack of adequate action from national governments to promote growth through structural reforms, fiscal policy and investment expenditure.

•Major national polls:

- •Italian constitutional referendum 4.12.16 resulted in a 'No' vote which led to the resignation of Prime Minister Renzi. This means that Italy needs to appoint a new government.
- •Spain has a minority government with only 137 seats out of 350 after already having had two inconclusive general elections in 2015 and 2016. This is potentially highly unstable.
- •Dutch general election 15.3.17;
- •French presidential election April/May 2017;
- •French National Assembly election June 2017;
- •German Federal election August – October 2017.

•A resurgence of the Eurozone sovereign debt crisis, with Greece being a particular problem, and stress arising from disagreement between EU countries on free movement of people and how to handle a huge influx of immigrants and terrorist threats

•Weak capitalisation of some European banks, especially Italian.

•Geopolitical risks in Europe, the Middle East and Asia, causing a significant increase in safe haven flows.

•UK economic growth and increases in inflation are weaker than we currently anticipate.

•Weak growth or recession in the UK's main trading partners - the EU and US.

The potential for upside risks to current forecasts for UK gilt yields and PWLB rates, especially for longer term PWLB rates, include: -

•UK inflation rising to significantly higher levels than in the wider EU and in the US, causing an increase in the inflation premium in gilt yields.

•A rise in US Treasury yields as a result of Fed. funds rate increases and rising inflation expectations in the USA, dragging UK gilt yields upwards.

•The pace and timing of increases in the Fed. funds rate causing a fundamental reassessment by investors of the relative risks of holding bonds as opposed to equities and leading to a major flight from bonds to equities.

•A downward revision to the UK's sovereign credit rating undermining investor confidence in holding sovereign debt (gilts).

### 3.4 Borrowing strategy

The Council is currently maintaining an under-borrowed position. This means that the capital borrowing need ( the Capital Financing Requirement), has not been fully funded with loan debt as cash supporting the Council's reserves, balances and cash flow has been used as a temporary measure. This strategy is prudent as investment returns are low and counterparty risk is relatively high.

Against this background and the risks within the economic forecast , caution will be adopted with the 2017/18 treasury operations. The Section 151 Officer will monitor interest rates in the financial markets and adopt a pragmatic approach to changing circumstances.

• if it was felt that there was a significant risk of a sharp FALL in long and short term rates (e.g. due to a marked increase of risks around relapse into recession or of risks of deflation), then long term borrowings will be postponed, and potential rescheduling from fixed rate funding into short term borrowing will be considered.

• if it was felt that there was a significant risk of a much sharper RISE in long and short term rates than that currently forecast, perhaps arising from an acceleration in the start date and in the rate of increase in central rates in the USA and UK, an increase in world economic activity or a sudden increase in inflation risks, then the portfolio position will be re-appraised. Most likely, fixed rate funding will be drawn whilst interest rates are lower than they are projected to be in the next few years.

Any decisions will be reported to the appropriate decision making body at the next available opportunity.

**Treasury management limits on activity**

- The Council must set both upper and lower limits with respect to the maturity structure of borrowing for the following financial year. This indicator is designed to be a control over an authority having large concentrations of fixed rate debt needing to be replaced at times of uncertainty over interest rates. Therefore the aim should be a relatively even spread of debt repayment dates.
- It is recommended that the Council sets upper and lower limits for the maturity structure of its borrowings as follows:

| | Upper Limit % | Lower Limit % |
|---|---|---|
| Under 12 months | 50 | 0 |
| 12 months and within 24 months | 50 | 0 |
| 24 months and within 5 years | 100 | 0 |
| 5 years and within 10 years | 100 | 0 |
| 10 years and within 20 years | 100 | 0 |
| 20 years and within 30 years | 100 | 0 |
| 30 years and within 40 years | 100 | 0 |
| 40 years and within 50 years | 100 | 0 |
| 50 years and above | 100 | 0 |

### 3.5 Current Portfolio Position

The Council's treasury debt portfolio position at 31st December 2016 comprised:

| | | Principal £m | Ave. rate % |
|---|---|---|---|
| Fixed rate borrowing | PWLB | 49.20 | 3.66 |
| | Market | 15.90 | 4.00 |
| **TOTAL DEBT** | | **£65.10m** | **3.74** |
| **TOTAL INVESTMENTS** | | **26.90m** | **0.63** |

### 3.6 Policy on borrowing in advance of need

The Council will not borrow more than or in advance of its needs purely in order to profit from the investment of the extra sums borrowed. Any decision to borrow in advance will be within forward approved Capital Financing Requirement estimates, and will be considered carefully to ensure that value for money can be demonstrated and that the Council can ensure the security of such funds.

Risks associated with any borrowing in advance activity will be subject to prior appraisal and subsequent reporting through the mid-year or annual reporting mechanism.

### 3.7 Debt rescheduling

The Council will continue to maintain a flexible policy for debt rescheduling. As short term borrowing rates will be considerably cheaper than longer fixed interest rates, there may be potential opportunities to generate savings by switching from long term debt to short term debt. However, these savings will need to be considered in the light of the current treasury position and the size of the cost of debt premium repayment. The rationale for rescheduling would be one or more of the following:

- Savings in interest costs with minimal risk
- Balancing the ratio of fixed to variable debt
- Enhance the balance of the portfolio (amend the maturity profile and/or the balance of volatility)

Any rescheduling activity will be undertaken following the rationale within the Council's Treasury Management Strategy. The Section 151 Officer will agree in advance with Capita on the strategy and framework within which debt will be repaid/rescheduled if opportunities arise. Thereafter the Council's debt portfolio will be monitored against equivalent interest rates and available refinancing options on a regular basis. As opportunities arise, they will be identified by Capita and discussed with the Council's treasury officers.

All rescheduling activity will comply with the accounting requirements of the local authority Code of Practice and regulatory requirements of the Capital Finance and Accounting Regulations (SI 2007 No 573 as amended by SI 2008/414).

All rescheduling and any new long term borrowing undertaken will be reported to the Treasury Management Panel at the meeting following its action.

### 3.8 Municipal Bond Agency

It is likely that the Municipal Bond Agency, currently in the process of being set up, will be offering loans to local authorities in the near future. It is also hoped that the borrowing rates will be lower than those offered by the Public Works Loan Board (PWLB). This council could make use of this new source of borrowing as and when required.

# 4. ANNUAL INVESTMENT STRATEGY

## 4.1 Investment policy

The Council's investment policy has regard to the CLG's Guidance on Local Government Investments ("the Guidance") and the 2011 revised CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes ("the CIPFA TM Code"). The Council's investment priorities will be security first, liquidity second,then return.

In accordance with guidance from the CLG and CIPFA, and in order to minimise the risk to investments, the Council applies minimum acceptable credit criteria in order to generate a list of highly creditworthy counterparties which also enables diversification and thus avoidance of concentration risk. The key ratings used to monitor counterparties are the Short Term and Long Term ratings.

Ratings will not be the sole determinant of the quality of an institution; it is important to continually assess and monitor the financial sector on both a micro and macro basis and in relation to the economic and political environments in which institutions operate. The assessment will also take account of information that reflects the opinion of the markets. To this end the Council will engage with its advisors to maintain a monitor on market pricing such as "credit default swaps" and overlay that information on top of the credit ratings.

Other information sources used will include the financial press, share price and other such information pertaining to the banking sector in order to establish the most robust scrutiny process on the suitability of potential investment counterparties.

Investment instruments identified for use in the financial year are listed in Appendix 3 under the 'specified' and 'non-specified' investments categories. Counterparty limits will be as set through the Council's treasury management practices – schedules.

Continuing regulatory changes in the banking sector are designed to see greater stability, lower risk and the removal of expectations of Government financial support should an institution fail. This withdrawal of implied soverign support is anticipated to have an effect on ratings applied to institutions. This will result in the key ratings used to monitor counterparties being the Short term and Long Term ratings only. Viability, Financial Strength and Support Ratings previously applied will effectively become redundant. This change does not reflect deterioration in the credit environment but rather a change of method in response to regulatory changes.

As with previous practice, ratings will not be the sole determinant of the quality of an institution and that it is important to continually assess and monitor the financial sector on both a micro and macro basis and in relation to the economic and political environments in which institutions operate. The assessment will also take account of information that reflects the opinion of the markets. To this end the

Council will engage with its advisors to maintain a monitor on market pricing such as “credit default swaps” and overlay that information on top of the credit ratings.

Other information sources used will include the financial press, share price and other such information pertaining to the banking sector in order to establish the most robust scrutiny process on the suitability of potential investment counterparties.

The aim of the strategy is to generate a list of highly creditworthy counterparties which will also enable diversification and thus avoidance of concentration risk.

The intention of the strategy is to provide security of investment and minimisation of risk.

Investment instruments identified for use in the financial year are listed below in paragraph 4.2 under the ‘specified’ and ‘non-specified’ investments categories as well as the counterparty limits.

## 4.2 Specified and Non- Specified Investments

Specified Investments are investments offering high security and high liquidity. The investments will be sterling denominated with maturities up to a revised maximum of one year and meet the minimum ‘high’ credit rating criteria where applicable. Instruments identified for use in the financial year are listed in table below under the ‘specified’ and ‘non-specified’ investments categories.

**SPECIFIED INVESTMENTS**
**All ‘Specified and Non Specified Investments’ listed below must be sterling-denominated.**

The types of investments that will be used by the Council

| Investment | Max Sum per institution/group | Maximum period |
|---|---|---|
| **Debt Management Agency Deposit Facility*** (DMADF)<br>• this facility is at present available for investments up to 6 months | UNLIMITED | 6 months |
| **UK Government Gilts/ Bonds** | £2m | 2 years |
| **UK Government Treasury Bills** | UNLIMITED | 1 year |
| **Term deposits** with the UK government or with UK local authorities (i.e. local authorities as defined under Section 23 of the 2003 Act) with maturities up to 1 year | £7m | Unlimited |
| **Term deposits** with credit-rated deposit takers (banks and building societies), including callable deposits (UK & Non-UK) | £7m | 2 years |

| | | |
|---|---|---|
| **Repos/Reverse Repo** through custodian King & Shaxson | £5m | 1 year |
| **Money Market Funds** with UK/Ireland/Luxembourg domiciled | £2m per fund | Liquid |
| **Enhanced Money Market funds** UK/Ireland/Luxembourg domiciled | £2m per fund | Liquid - 3months - 5 years |
| **Corporate Bonds** held in a broker's nominee account (King & Shaxson Ltd) | £2m | 2 years to maturity |
| **T-Bills** issued by the DMO (Government) | UNLIMITED | 1 year |
| **Certificates of deposit (CD's)** issued by banks and building societies covered by UK Government (explicit) guarantee | £7m | 2 years |

**Non-specified investments** are of greater potential risk and cover deposit periods over one year.
A variety of investment instruments will be used, subject to the credit quality of the institution, and depending on the type of investment made it will fall into one of the above categories.

The types of investments that may be used by the Council, and whether they are specified or non-specified are as follows:
**Specified and Non-Specified Investments**

| **Investment** | Specified | Non-Specified |
|---|---|---|
| Term deposits with banks and building societies | ✓ | ✓ |
| Term deposits with other UK local authorities | ✓ | ✓ |
| Certificates of deposit with banks and building societies | ✓ | ✓ |
| UK Government Gilts & Bonds | ✓ | ✓ |
| Treasury Bills (T-Bills) | ✓ | × |
| Bonds issued by Multilateral Development Banks | ✓ | ✓ |
| Local Authority Bills | ✓ | × |
| Commercial Paper | ✓ | × |
| Corporate Bonds | ✓ | ✓ |
| *Repo/reverse repo – fixed term deposits with banks and other financial institutions | ✓ | × |
| Property Funds | × | ✓ |
| AAA rated Money Market Funds /Enhanced Funds | ✓ | ✓ |
| Other Money Market and Collective Investment Schemes | ✓ | ✓ |

| | | |
|---|---|---|
| Equities – One off for an App investment | × | ✓ |
| Debt Management Account Deposit Facility | ✓ | × |

* A repo is the name for a sale and repurchase agreement; a contract in which a party (cash borrower) sells a security to another, agreeing to buy it back at a later date at a specified price. A reverse repo is purely the cash lenders side of the transaction; lending money to an organisation and receiving high quality collateral against it. As a form of collateralised lending this is based on the GMRA (Global Master Repo Agreement). Should the counterparty not meet our senior unsecured rating then a 102% collateralisation would be required. The acceptable collateral is as follows

- Index linked gilts
- Conventional gilts
- UK Treasury bills
- DBV (Delivery by Value)
- Corporate bonds

### 4.3 Creditworthiness policy

This Council applies the creditworthiness service provided by Capita Asset Services. This service employs a sophisticated modelling approach utilising credit ratings from the three main credit rating agencies - Fitch, Moody's and Standard and Poor's. The credit ratings of counterparties are supplemented with the following overlays:

- credit watches and credit outlooks from credit rating agencies;
- CDS spreads to give early warning of likely changes in credit ratings;
- sovereign ratings to select counterparties from only the most creditworthy countries.

This modelling approach combines credit ratings, credit watches and credit outlooks in a weighted scoring system which is then combined with an overlay of CDS spreads for which the end product is a series of colour coded bands which indicate the relative creditworthiness of counterparties. These colour codes are used by the Council to determine the suggested duration for investments. The Council will therefore use counterparties within the following durational bands:

- Yellow 5 years *
- Dark Pink 5 years for Enhanced money market funds (EMMFs) with a credit score of 1.25
- Light Pink 5 years for Enhanced money market funds (EMMFs) with a credit score of 1.5
- Purple 2 years
- Blue 1 year (only applies to nationalised or semi nationalised UK Banks)
- Orange 1 year
- Red 6 months

- Green 3 months
- No colour not to be used

The Capita creditworthiness service uses a wider array of information than just primary ratings and by using a risk weighted scoring system, does not give undue preponderance to just one agency's ratings.

Typically the minimum credit ratings criteria the Council use will be a short term rating (Fitch or equivalents) of short term rating F1, long term rating A-. There may be occasions when the counterparty ratings from one rating agency are marginally lower than these ratings but may still be used. In these instances consideration will be given to the whole range of ratings available, or other topical market information, to support their use. UK part nationalised banks such as National Westminster Bank and Royal Bank of Scotland are currently rated as BBB+ but remain on the list as they have the government support at present. However once the majority of these banks shares are sold they will be colour coded as an unsupported bank in line all the other banks, and if the rating falls below A-, will be removed from the lending list.

All credit ratings will be monitored weekly and upon any adhoc changes. The Council is alerted to changes to ratings of all three agencies through its use of the Capita Asset Services' creditworthiness service.

- if a downgrade results in the counterparty / investment scheme no longer meeting the Council's minimum criteria, its further use as a new investment will be withdrawn immediately.

- in addition to the use of credit ratings the Council will be advised of information in movements in credit default swap spreads against the iTraxx benchmark and other market data on a weekly basis. Extreme market movements may result in downgrade of an institution or removal from the Council's lending list.

Sole reliance will not be placed on the use of this external service. In addition this Council will also use market data and market information, information on any external support for banks to help support its decision making process.

### 4.4 Country limits

The Council has determined that it will only use approved counterparties from countries with a minimum sovereign credit rating of **AA-** from Fitch with a minimum institute rating of A- or equivalent . The list of countries that qualify using this credit criteria as at the date of this report are shown in Appendix 3. This list will be added to, or deducted from, by officers should ratings change in accordance with this policy.

**4.5 Council's Banker**

The Council banks with Lloyds (Lloyds Banking Group). On adoption of this Strategy, it will meet the minimum credit criteria of A- (or equivalent) long term. It is the Councils intention that even if the credit rating of Lloyds Bank falls below the minimum criteria A the bank will continue to be used for short term liquidity requirements (overnight and weekend investments) and business continuity arrangements.

**4.6 Annual Minimum Revenue Provision (MRP) Statement**

The annual MRP Statement is disclosed in Appendix 4.

**4.7 Balanced Budget Requirement**

The Authority complies with the provisions of S32 of the Local Government Finance Act 1992 to set a balanced budget.

**4.8 Reporting on the Treasury Outturn**

The Section 151 Officer will report to Council on its treasury management activities and performance against the strategy at least twice a year, one at mid-year and a year- end review at closedown time.

The Treasury Management Panel will be responsible for the scrutiny of treasury management activity and practices.

**4.9 Other Items**

**4.10 Training**

In CIPFA's Code for Treasury Management, it requires the Section 151 Officer to ensure that all appropriate staff and members tasked with treasury management responsibilities, including scrutiny of the treasury management function, receive appropriate training relevant to their needs and understand fully their roles and responsibilities. Training requirements will be identified and any shortfalls will be met by Capita or other organisations.

**4.11 Treasury Advisors**

The CLG's Guidance on local government investments recommend that the Investment Strategy should state:

- Whether and, if so, how the authority uses external advisors offering information, advice or assistance relating to investment and
- How the quality of any such service is controlled.

The Council appointed Capita Asset Services Ltd as its external advisor in December 2012 which was extended to 30 November 2017. They provide us with information, advice and assistance in all areas of treasury. The Council aims

to have a close working relationship with Capita and will be in contact with their advisors on a regular basis (weekly) and daily if necessary. A detailed schedule of services is listed within the contract. The Council recognises that responsibility for treasury management decisions remains with the Council at all times.

In the coming months of 2017, the Council intends to re-tender the Treasury Advice Contract in partnership with the GO authorities and Gloucestershire County Council.

**CHELTENHAM BOROUGH COUNCIL - COUNTERPARTY LIST as at 9th January 2017**

| Country /Domicile | Counterparty | Max CP Limit £m | Max Group Limit £m | Max Duration | Fitch Long-Term Rating | |
|---|---|---|---|---|---|---|
| **UK Financial Institutions:** | | | | | | |
| UK | Abbey National Treasury Services plc | 7.0 | - | 6 months | A | |
| UK | Barclays Bank Plc | 7.0 | - | 6 months | A | |
| UK | Close Brothers Ltd | 7.0 | - | 6 months | A | |
| UK | Goldman Sachs International Bank | 7.0 | - | 6 months | A | |
| UK | HSBC Bank Plc | 7.0 | - | 12 months | AA- | |
| UK | Santander | 7.0 | - | 6 months | A | |
| UK | Standard Chartered Bank | 7.0 | - | 3 months | A+ | |
| UK | Sumitomo Mitsui Banking Corporation Europe Ltd | 7.0 | - | 6 months | A | |
| UK | UBS Ltd | 7.0 | - | 6 months | A+ | |
| UK | Nationwide Building Society | 7.0 | - | 6 months | A | |
| UK | Coventry Building Society | 7.0 | - | 6 months | A | |
| UK | Leeds Building Society | 7.0 | - | 6 months | A- | |
| UK | Skipton Building society | 7.0 | - | 3 months | A- | New |
| UK | Yorkshire Building Society | 7.0 | - | 3 months | A- | |
| UK | Bank of Scotland (Lloyds Banking Group) | 7.0 | 9.0 | 6 months | A+ | |
| UK | Lloyds Bank (Lloyds Banking Group) | 7.0 | 9.0 | 6 months | A+ | |
| UK | Nat West Bank (RBS Group) | 7.0 | 9.0 | 12 months | BBB+ | Part Nationalised |
| UK | Royal Bank of Scotland (RBS Group) | 7.0 | 9.0 | 12 months | BBB+ | Part Nationalised |

All the above banks are UK based and are authorised by the FSA

**Others:**

| | | | | | |
|---|---|---|---|---|---|
| UK | Local Authorities | 7.0 | - | Non-Specified | - |
| | Money Market Funds (MMFs) | 10% total Investment in any fund | - | 1 year | - |

**Policy Investments:**

| | | | | | |
|---|---|---|---|---|---|
| UK | Cheltenham Festivals Ltd | 0.1 | | 12 months | - |
| UK | The Gloucestershire Everyman Theatre | 0.1 | | 12 months | - |
| UK | Cheltenham Trust | 0.1 | | 12 months | - |
| UK | Ubico Ltd | 0.5 | | 12 months | - |
| UK | Cheltenham Borough Homes | 10.00 | | Non-Specified | - |
| UK | Maybe* - Buying APP- Equity Shares | 0.025 | | Non-Specified | - |
| UK | Gloucestershire Airport Ltd - including outstanding loan for Runway Safety project - split 50/50 between CBC & Glos City Council | 1.00 | | 6 Years | - |

**Sovereign rating AA- minimum**

| Country /Domicile | Counterparty | Max CP Limit £m | Max Group Limit £m | Max Duration | Fitch Long-Term Rating | |
|---|---|---|---|---|---|---|
| **Non-UK Financial Institutions:** | | | | | | |
| Australia | Australia & New Zealand Banking Group Ltd | 2.0 | 2.0 | 12 months | AA- | |
| Australia | Commonwealth Bank of Australia | 2.0 | 2.0 | 12 months | AA- | |
| Australia | National Australia Banks Ltd | 2.0 | 2.0 | 12 months | AA- | |
| Australia | Westpac Banking Corporation | 2.0 | 2.0 | 12 months | AA- | |
| Canada | Bank of Montreal | 2.0 | 2.0 | 12 months | AA- | |
| Canada | Bank of Nova Scotia | 2.0 | 2.0 | 12 months | AA- | |
| Canada | Canadian Imperial Bank of Commerce | 2.0 | 2.0 | 12 months | AA- | |
| Canada | Royal Bank of Canada | 2.0 | 2.0 | 12 months | AA | |
| Canada | Toronto Dominion Bank | 2.0 | 2.0 | 12 months | AA- | |
| Finland | Nordea Bank Finland plc | 2.0 | 2.0 | 12 months | AA- | |
| Finland | OP Corporate Bank plc | 2.0 | 2.0 | 12 months | AA- | Not Fitch Rated but Moody's & S&P |
| Germany | DZ Bank AG (Deutsche Zentral-Genossenschaftsbank) | 2.0 | 2.0 | 12 months | AA- | |
| Germany | Landwirtschaftliche Rentenbank | 2.0 | 2.0 | 2 years | AAA | |
| Germany | NRW.BANK | 2.0 | 2.0 | 2 years | AAA | |
| Netherlands | Bank Nederlandse Gemeenten | 2.0 | 2.0 | 2 years | AA+ | |
| Netherlands | Cooperatieve Rabobank U.A. | 2.0 | 2.0 | 12 months | AA- | |
| Netherlands | Nederlandse Waterschapsbank N.V | 2.0 | 2.0 | 2 years | AAA | Not Fitch Rated but Moody's & S&P |
| Singapore | DBS Bank Ltd | 2.0 | 2.0 | 12 months | AA- | |
| Singapore | Oversea Chinese Banking Corporation | 2.0 | 2.0 | 12 months | AA- | |
| Singapore | United Oversea Bank Ltd | 2.0 | 2.0 | 12 months | AA- | |
| Sweden | Nordea Bank AB | 2.0 | 2.0 | 12 months | AA- | |
| Sweden | Skandinaviska Enskilda Banken AB | 2.0 | 2.0 | 12 months | AA- | |
| Sweden | Swedbank AB | 2.0 | 2.0 | 12 months | AA- | |
| Sweden | Svenska Hadelsbanken AB | 2.0 | 2.0 | 12 months | AA | |
| USA | Bank of New York Mellon, The | 2.0 | 2.0 | 2 years | AA | |
| USA | JP Morgan Chase Bank NA | 2.0 | 2.0 | 12 months | AA- | |
| USA | Wells Fargo Bank NA | 2.0 | 2.0 | 12 months | AA | |

**Minimum Credit rating of AA- for Non-UK bank.**
**Limit of 40% of investment portfolio with non-uk banks.**

**Appendix 4**

# Annual MRP Statement

## Revised MRP Policy for 2016/17 and MRP Policy for 2017/18

### Background:

1. For many years local authorities were required by Statute and associated Statutory Instruments to charge to the Revenue Account an annual provision for the repayment of debt associated with expenditure incurred on capital assets. This charge to the Revenue Account was referred to as the Minimum Revenue Provision (MRP). In practice MRP represents the financing of capital expenditure from the Revenue Account that was initially funded by borrowing.

2. In February 2008 the Local Authorities (Capital Finance and Accounting) (England) (Amendment) Regulations 2008 [Statutory Instrument 2008/414] were approved by Parliament and became effective on 31st March 2008. These regulations replaced the formula based method for calculating MRP which existed under previous regulations under the Local Government Act 2003. The new regulations required a local authority to determine each financial year an amount of MRP which it considers to be 'prudent'. Linked to this new regulation, the Department of Communities and Local Government (CLG) produced Statutory Guidance which local authorities are required to follow, setting out what constitutes a prudent provision.

3. The CLG Guidance recommends that, before the start of the financial year, a statement of MRP policy for the forthcoming financial year is approved by Full Council. If it is ever proposed to vary the original statement for the current year, a revised statement should be put to the council at that time.

4. The broad aim of the Policy is to ensure that MRP is charged over a period that is reasonably commensurate with the period over which the capital expenditure which gave rise to the debt provides benefits. In the case of borrowing supported by Revenue Support Grant ('Supported Borrowing'), the aim is that MRP is charged over a period reasonably commensurate with the period implicit in the determination of that grant. MRP is not required to be charged to the Housing Revenue Account. Where a local authority's overall underlying need to borrow for capital purposes, known as the Capital Financing Requirement (CFR), is nil or a negative amount there is no requirement to charge MRP.

### MRP Options:

5. Four options for prudent MRP provision are set out in the CLG Guidance. Details of each are set out below with a summary set out in Table 1 below:

**Option 1 – Regulatory Method:**

6. This method replicates the position that would have existed under the previous regulatory environment. MRP is charged at 4% of the Authority's underlying need to borrow for capital purposes, the Capital Financing Requirement (CFR). The formula includes an item known as "Adjustment A" which was intended to achieve neutrality between the CFR and the former Credit Ceiling, used to calculate MRP prior to the introduction of the Prudential System on 1st April 2004. The formula also took into account any reductions relating to the commutation of capital debt made by central government.

7. The latest CLG guidance (effective from 1 April 2012) states that authorities **may** continue to use this method for capital expenditure incurred before 1 April 2008 and supported borrowing, allowing authorities to modify the method if it produces an 'anomalous and disadvantageous result'.

8. This method (which is based on a 4% reducing balance) has been used by the council up until 2015/16 for pre 1 April 2008 and supported borrowing. Under this method however, although the MRP charge reduces each year, the borrowing is never entirely paid off. Consequently, from 2016/17, it is proposed the charge will be based on repaying the debt on a 'straight line' (or equal annual instalment) basis over a 35 year period. This has the advantage of a constant charge which fully repays the debt, which is more prudent. Under the unmodified regulatory method approximately £2.07 million of outstanding debt would still be outstanding after 35 years (see graph 1 below). In addition the effect of this change is that MRP will be lower than it would have been for the first 9 years (with a saving in 2016/17 of around £95,000 in 2016/17), before increasing gradually (see graph 2 below).

9. The annual General Fund MRP charge using this method will be £236,847 starting in 2016/17.

**Option 2 – CFR Method:**

10. This method simplifies the calculation of MRP by basing the charge solely on the authority's CFR but excludes the technical adjustments included in Option 1. The annual MRP charge is set at 4% of the non-housing CFR at the end of the preceding financial year.

11. The General Fund MRP charge for this method is nil for 2016/17 and 2017/18.

**Option 3 – Asset Life Method:**

12. Under this method MRP is determined by the life of the asset for which the borrowing is undertaken. This can be calculated by either of the following methods:
(a) Equal Instalments: where the principal repayment made is the same in each year, or
(b) Annuity: where the principal repayments increase over the life of the asset.

    The annuity method has the advantage of linking MRP to the benefits arising from capital expenditure, where these benefits are expected to increase over the life of the asset.

13. MRP commences in the financial year following that in which the expenditure is incurred or, in the year following that in which the relevant asset becomes operational. This enables an MRP "holiday" to be taken in relation to assets which take more than one year to be completed before they become operational.

14. The estimated life of the asset will be determined in the year that MRP commences and will not be subsequently revised. However, additional repayments can be made in any year which will reduce the level of payments in subsequent years.

15. If no life can be reasonably attributed to an asset, such as freehold land, the life is taken to be a maximum of 50 years. In the case of freehold land on which a building or other structure is constructed, the life of the land will be treated as equal to that of the structure, where this would exceed 50 years.

16. In instances where central government permits revenue expenditure to be capitalised, the Statutory Guidance sets out the number of years over which the charge to revenue must be made. The maximum useful life for expenditure capitalised by virtue of a direction under s16(2)(b) is 20 years.

17. MRP in respect Finance Leases brought onto the Balance Sheet falls under Option 3.

18. The General Fund MRP charge using this method is estimated at £1.119 million 2016/17 and £0.867 million for 2017/18 (subject to approval of the proposal regarding the repayment of debt relating to capital loans made in paragraph 24 below).

**Option 4 - Depreciation Method:**

19. The depreciation method is similar to that under Option 3 but MRP is equal to the depreciation provision required in accordance with proper accounting practices to be charged to the Income and Expenditure account.

20. The General Fund MRP charge for this method is nil for 2016/17 and 2017/18.

**Conditions of Use:**

21. The CLG Guidance puts the following conditions on the use of the four options:

    Options 1 and 2 can be used on all capital expenditure incurred before 1st April 2008 and on Supported Capital Expenditure on or after that date.

    Options 3 and 4 are considered prudent options for Unsupported Capital Expenditure on or after 1st April 2008. These options can also be used for Supported Capital Expenditure whenever incurred.

**MRP Policy for 2016/17 and 2017/18:**

22. It is proposed that the council adopts
    - the modified Option 1 – repayment over 35 years on a straight line basis - for borrowing incurred before 1 April 2008, which is Supported Borrowing
    - Option 3 for borrowing after 1 April 2008 and Unsupported Borrowing. For Option 3, the annuity method for calculating MRP will be used when applicable as it has the advantage of linking MRP to the benefits arising from capital expenditure, where these benefits are expected to increase over the life of the asset.

**Repayment of debt relating to capital loans made:**

23. In recent years the council has made a number of capital loans to Gloucestershire Airport, The Everyman Theatre and Cheltenham Borough Homes (CBH) funded from prudential borrowing. Currently the council is setting aside MRP to repay this debt over the life of the loans (equivalent to the estimated life of the capital assets) using option 3's annuity method, as permitted by the CLG guidance. The annual repayments from the borrowers (which match the MRP) must be treated as capital receipts, so are used to fund the capital programme in lieu of revenue funding. In this way the impact of these loans on the revenue account is neutral, since the additional MRP is matched by an equivalent reduction in the revenue funding for the capital programme.

24. This policy, although currently neutral on the revenue account, is however constraining the council's ability to make further capital loans should it wish, since this would increase the MRP further, whilst generating more capital receipts than required to fund the capital programme. The capital finance regulations allow the council to use capital receipts to 'repay the principal of any amount borrowed', therefore it is proposed, from 2017/18, to replace MRP provision for repaying the debt on capital loans with set aside of the equivalent amount from usable capital receipts, equal to the annual repayments of principal by the borrowers. This would reduce the capital receipts available to fund the capital programme, but would also reduce MRP by an equivalent amount. The borrowers are contracted to fully repay the loans over their lives in annual instalments, so all of the debt will be repaid. The amount of debt to be repaid by this method in 2017/18 is approximately £236,000.

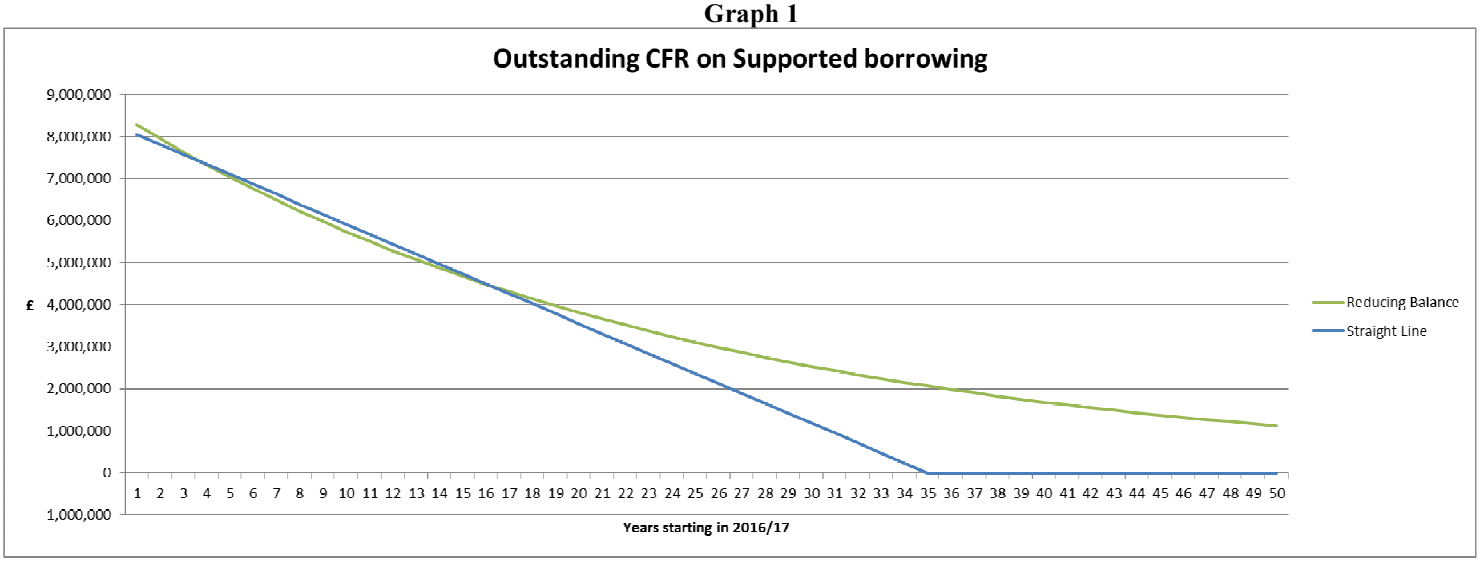
**Appendix 4**

## Table 1

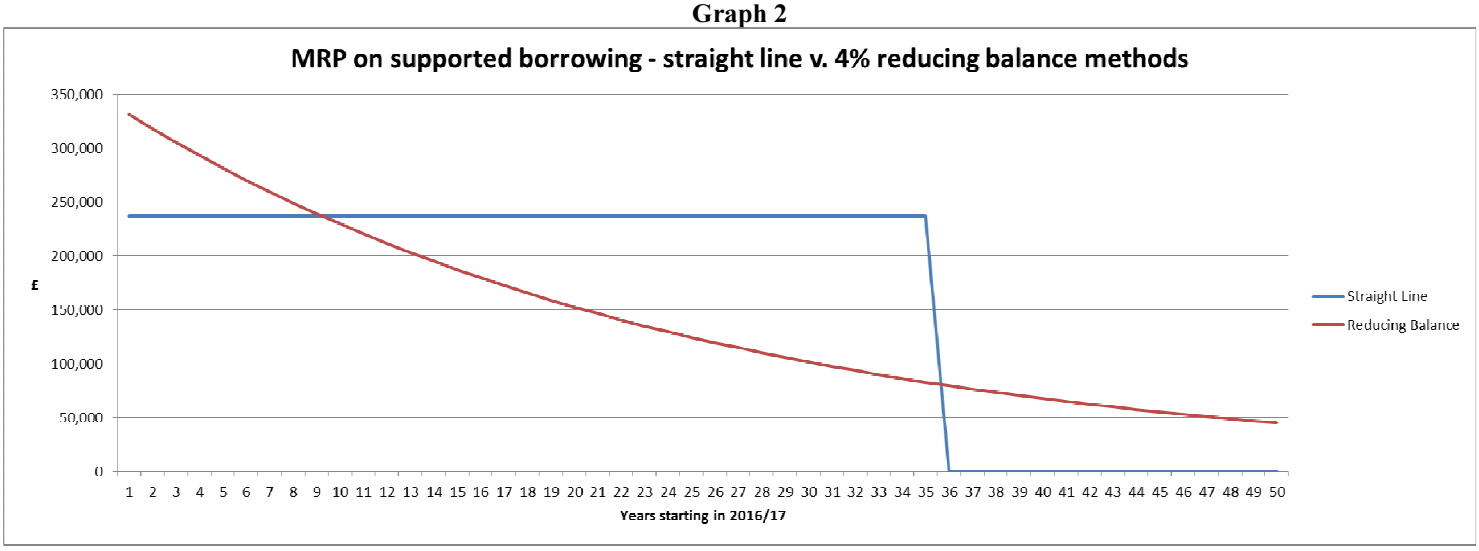
**MRP under the CLG Guidance**

| MRP Options | 1<br>Regulatory Method | 2<br>CFR Method | 3<br>Asset Life Method | 4<br>Depreciation Method |
|---|---|---|---|---|
| Classifications of Capital Expenditure impacting on the CFR | Capital expenditure incurred before 1 April 2008 | | | |
| | Supported Capital expenditure incurred after 1 April 2008 | | Unsupported Capital expenditure incurred after 1 April 2008 | |
| | | | Expenditure capitalised by virtue of a Direction under s16(2)(b) of the Local Government Act 2003 | |
| MRP Basis | Former regulations 28 and 29 | 4% of Non-Housing CFR | Equal Annual Instalments of Principal | Depreciation |
| Aspects of MRP charges | CFR excludes element attributable to Unsupported Capital Expenditure | | EIP commences when asset operational | Depreciation MRP commences when asset operational |
| | | | Freehold land 50 years. | Depreciation MRP ceases when CFR component is £Nil |
| | | | Freehold land with structure >50 years | Depreciation MRP not adjusted for capital receipt |
| | | | Capitalisation periods | Depreciation MRP based on proportion of asset financed from "borrowing". |
| | | | PFI/Operating Leases brought on Balance Sheet under IFRS | |

**Graph 1**




**Graph 2**



## GLOSSARY OF TERMS

**Bank Rate**
The rate of interest set by the Bank of England as a benchmark rate for British banks.

**Bonds**
A long-term debt security issued by a company, a financial institution, a local authority, national government or its affiliated agencies. It represents an undertaking to repay the holder the fixed amount of the principal on the maturity date plus a specified rate of interest payable either on a regular basis during the bond's life (coupon) or at maturity.

**Borrowing**
Loans taken out taken out by the authority to pay for capital expenditure or for the prudent management of the Council's financial affairs which are repayable with interest.

**Capital Expenditure**
Capital expenditure pays for improvements to existing and new assets used in the delivery of Council services as well as other items determined by Regulation. Capital resources are scarce, costly and also have long term revenue implications over many years and even generations where capital expenditure is funded by borrowing. Hence the requirement of the Prudential Code to ensure what is charged as Capital Expenditure is Prudent, Sustainable and Affordable. The statutory definition of capital expenditure is given in the Local Government Act 2003, the Local Authorities (Capital Finance) Regulations 2003 and 2004 as amended. Statute relies on the accounting measurement of cost in International Accounting Standard (IAS) 16 to determine whether expenditure is eligible to be capitalised or whether it should be treated as revenue expenditure. Key to what is eligible as capitals spend, are the following words in IAS 16 -'Costs directly attributable to bringing the specific asset into working condition for its intended use'.

**Capital Financing Requirement (CFR)**
An authority's underlying need to borrow for a capital purpose.

**Capital Market**
A market for securities (debt or equity), where companies and governments can raise long-term funds (periods greater than one year). The raising of short-term funds takes place on other markets (e.g. the money market).

**Capital Programme**
The Capital Programme sets out the Council's capital expenditure plans for the forthcoming financial year as well as for the medium term. It is approved annually at Council and identifies the estimated cost of those schemes, their projected phasing over financial years as well as the method of funding such expenditure.

**Certificates of Deposits (CDs)**
A certificate issued for deposits made at a deposit-taking institution (generally a bank). The bank agrees to pay a fixed interest rate for the specified period of time, and repays the principal at maturity. CDs can be purchased directly from the banking institution or through a securities broker. An active interbank secondary market exists to buy and sell CDs.

**Chartered Institute of Public Finance & Accountancy (CIPFA)**
CIPFA is the professional body for people in public finance. As a specialised public services body, they provide information, guidance, and determine accounting standards and reporting standards to be followed by Local Government.

**Collective Investment Scheme Structures**
Schemes whereby monies from a number of investors are pooled and invested as one portfolio in accordance with pre-determined objectives.

**Commercial Paper**
A relatively low risk, short-term and unsecured promissory note traded on money markets issued by companies or other entities to finance their short-term cash requirements.

**Corporate Bonds**
Bonds that are issued by a company or other non-government issuers. They represent a form of corporate debt finance and are an alternative means of raising new capital other than equity finance or bank lending.

**Counterparty**
One of the parties involved in a financial transaction with which the Council may place investments.

**Counterparty / Credit Risk**
Risk that a counterparty fails to meet its contractual obligations to the Council to repay sums invested.

**Credit Criteria**
The parameters used as a starting point in considering with whom the Council may place investments, aimed at ensuring the security of the sums invested.

**Credit Default Swaps**
A financial transaction which the buyer transfers the credit risk related to a debt security to the seller, who receives a series of fees for assuming this risk. The levels of fees reflect the perceived level of risk.

**Credit Rating**
A credit rating assesses the credit worthiness of an individual, corporation, or even a country. Credit ratings are calculated from financial history and current assets and liabilities. Typically, a credit rating tells a lender or investor the probability of the subject being able to pay back a loan. Ratings usually consist of a long-term, short-term, viability and support indicators. The Fitch credit rating of F1 used by the Council is designated as “Highest Credit quality” and indicates the strongest capacity for timely payment of financial commitments.

**Debt Management Account Deposit Facility (DMADF)**
The Debt Management Office provides this service as part of its cash management operations and of a wider series of measures designed to improve local and central government’s investment framework and cash management. The key objective of the DMADF is to provide users with a flexible and secure facility to supplement their existing range of investment options while saving interest costs for central government.

**Debt Restructuring**
Debt restructuring is a process that allows an organisation to reduce, renegotiate and undertake replacement debt.

**Diversification of Investments**
The process of creating a portfolio of different types of financial instruments with regard to type, price, risk issuer, location, maturity, etc. in order to reduce the overall risk of the portfolio as a whole.

**Duration (Maturity)**
The length of time between the issue of a security and the date on which it becomes payable.

**External Borrowing**
Money borrowed from outside of the Council.

**Financial Instrument**
Any contract that gives rise to a financial asset of one entity and a financial liability or equity instrument of another. Typical financial liabilities are borrowing and financial guarantees. Typical financial assets include bank deposits, amounts owed by customers, loans receivable and investments.

**Fitch/Moody’s/Standard & Poors Credit Ratings**
Commercial organisations providing an opinion on the relative ability of an entity to meet financial commitments, such as interest, preferred dividends, repayment of principal, insurance claims or counterparty obligations. The opinion is usually provided in the form of a credit rating.

**Fixed Rate**
An interest rate that does not change over the life of a loan or other form of credit.

**Floating Rate Notes**
A money market security paying a floating or variable interest rate, which may incorporate a minimum or floor.
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**Housing Revenue Account (HRA)**
The HRA is an account of expenditure and income that every local authority housing department must keep in accordance with the Local Government & Housing Act 1989. The account is kept separate or ring fenced from other Council activities. Income is primarily generated by the rents and service charges paid by tenants, while expenditure is on the management and maintenance of the housing stock, and capital financing charges on the HRA's outstanding loan debt.

**Interest Rate Risk**
Risk that fluctuations in interest rates could impose extra costs against which the Council has failed to protect itself adequately.

**Internal Borrowing**
Money borrowed from within the Council, sourced from temporary internal cash balances.

**Investments**
The purchase of financial assets in order to receive income and/or make capital gain at a future time, however with the prime concern being security of the initial sum invested.

**Lender Option Borrower Option Loans (LOBOs)**
Loans to the Council where the lender can request a change in the rate of interest payable by the Council at pre-defined dates and intervals. The council at this point has the option to repay the loan.

**Liquidity**
The ability of the Council to meet its financial obligations as they fall due.

**Market Loans**
Borrowing that is sourced from the market i.e. organisations other than the Public Works Loan Board or a Public Body.

**Minimum Revenue Provision (MRP)**
This is the amount which must be charged to the authority's revenue account each year and set aside as provision for repaying external loans and meeting other credit liabilities. The prudent amount is determined in accordance with guidance issued by WG. This has the effect of reducing the Capital Financing Requirement (CFR).

**Money Market**
The market for short-term securities or investments, such as certificates of deposit, commercial paper or treasury bills, with maturities of up to one year.

**Money Market Funds**
An investment fund which pools the investments of numerous depositors, spreading those investments over a number of different financial instruments and counterparties. Funds with a constant Net Asset Value (NAV) are those where any sum invested is likely to be the same on maturity. Funds with a variable Net Asset Value (NAV) are those where the sum on maturity could be higher or lower due to movements in the value of the underlying investments.

**Net Asset Value (NAV)**
The market value of an investment fund's portfolio of securities as measured by the price at which an investor will sell a fund's shares or units.

**Pooling**
The process whereby investments or loans are held corporately rather than for specific projects or parts of the Council, with recharges to those areas for their share of the relevant income and expenditure using an agreed methodology, where such a recharge is required to be made.

**Prudential Code for Capital Finance**
The system introduced on 1 April 2004 by Part 1 of the Local Government Act 2003 which allows local authorities to borrow without Government consent, provided that they can afford to service the debt from their own resources and that any such borrowing is prudent and sustainable. This requires the preparation and approval of various indicators.

**Public Works Loans Board (PWLB)**
The Public Works Loans Board is a statutory body operating within the United Kingdom Debt Management Office, an Executive Agency of HM Treasury. PWLB's function is to lend money from the National Loans Fund to local authorities and other prescribed bodies, and to collect the repayments.

**Refinancing Risk**
Risk that maturing borrowing or other financing of capital projects cannot be renewed on terms that reflect existing assumptions and that the Council will suffer extra costs as a result.

**Regulatory Risk**
Risk that actions by the Council or by any person outside of it are in breach of legal powers or regulatory requirements resulting in losses to the Council, or the imposition of extra costs.

**Security**
Protecting investments from the risk of significant loss, either from a fall in value or from default of a counterparty.

**Sovereign Credit Ratings**
The credit rating of a country. It indicates the risk level of the investing environment of a country, taking into account political risk and other factors.

**Sterling**
The monetary unit of the United Kingdom (the British pound).

**Term Deposits**
A term deposit is a money deposit at a banking institution that cannot be withdrawn for a certain "term" or period of time.

**Treasury Management**
Treasury management activities are the management of an organisation's investments and cash flows, its banking, money market and capital market

transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks.

**Treasury Bills**
Debt securities issued by a government with a short-term maturity of up to 6 months.

**UK Government Gilts**
Fixed-interest debt securities issued or secured by the British Government. Gilts are always denominated in sterling though the Government occasionally also issues instruments in other currencies in the Eurobond market or elsewhere.

**Variable Rate**
An interest rate that changes in line with market rates.

**Yield**
The annual rate of return paid out on an investment, expressed as a percentage of the current market price of the relevant investment.

# Cheltenham Borough Council

## Council – 10th February 2017

## Future Provision of External Audit

| | |
|---|---|
| **Accountable member** | **Councillor Roger Whyborn, Cabinet Member for Corporate Services** |
| **Accountable officer** | **Paul Jones, Section 151 Officer** |
| **Ward(s) affected** | **None directly** |
| **Significant Decision** | **No** |
| **Executive summary** | Following the demise of the Audit Commission new arrangements were needed for the appointment of external auditors. The Local Audit and Accountability Act 2014 require authorities to either opt in to the appointing person regime or to establish an auditor panel and conduct their own procurement exercise. |
| **Recommendations** | **Recommend that this Council opts in to the appointing person arrangements made by Public Sector Audit Appointments (PSAA) for the appointment of external auditors.** |

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| **Financial implications** | If PSAA is not used some additional resource may be needed to establish an auditor panel and conduct our own procurement. Until either procurement exercise is completed it is not possible to state what additional resource may be required for audit fees for 2018/19, although it is anticipated that any increase will be minimised through using PSAA.<br><br>**Contact officer: Paul Jones, paul.jones@cheltenham.gov.uk 01242 775154** |
| **Legal implications** | The process as set out in the report and the recommendation will ensure compliance with the Local Audit and Accountability Act 2014.<br><br>**Contact officer: Peter Lewis, Peter.Lewis@tewkesbury.gov.uk, 01684 272012** |
| **HR implications (including learning and organisational development)** | There are no direct HR implications for this Council.<br><br>**Contact officer: Julie McCarthy , julie.mccarthy@cheltenham.gov.uk, 01242 264355** |
| **Key risks** | As set out in the report, use of PSAA minimises the risks inherent in undertaking our own procurement. |
| **Corporate and community plan Implications** | None. |

| | |
|---|---|
| **Environmental and climate change implications** | None. |

## 1. Background

**1.1** The Local Audit and Accountability Act 2014 (the Act) established new arrangements for the audit and accountability of relevant authorities, including local authorities.

**1.2** These new arrangements include the ability of such bodies to appoint their own local public auditors via an auditor panel. This may be carried out individually or jointly with one or more other authorities.

**1.3** The Secretary of State for Communities and Local Government has decided to implement a phased introduction of the new local audit framework. Smaller local authorities must have appointed their local auditors by 31st December 2016 and larger principal authorities (such as this Council) by 31st December 2017:

## 2. Reasons for Recommendations

**2.1** It is likely that a sector wide procurement conducted by PSAA will produce better outcomes for the Council than any procurement we undertook by ourselves or with a limited number of partners. Use of the PSAA will also be less resource intensive than establishing an auditor panel and conducting our own procurement.

**2.2** Regulation 19 of the Local Audit (Appointing Person) Regulations 2015 requires that a decision to opt in must be made by Full Council (authority meeting as a whole). To comply with this regulation the Audit Committee is asked to make the recommendation above to Full Council.

**2.3** A number of frequently asked questions are attached at Appendix 2 to aid Members in their decision-making.

## 3. Process and advantages

**3.1** As part of closing the Audit Commission the Government novated external audit contracts to PSAA on 1st April 2015. The audits were due to expire following conclusion of the audits of the 2016/17 accounts, but could be extended for a period of up to three years by PSAA, subject to approval from the Department for Communities and Local Government.

**3.2** In October 2015 the Secretary of State confirmed that the transitional provisions would be amended to allow an extension of the contracts for a period of one year. This meant that for the audit of the 2018/19 accounts it would be necessary for authorities to either undertake their own procurements or to opt in to the appointed person regime.

**3.3** There was a degree of uncertainty around the appointed person regime until July 2016 when PSAA were specified by the Secretary of State as an appointing person under regulation 3 of the Local Audit (Appointing Person) Regulations 2015. The appointing person is sometimes referred to as the sector led body and PSAA has wide support across most of local government. PSAA was originally established to operate the transitional arrangements following the closure of the Audit Commission and is a company owned by the Local Government Association's Improvement and Development Agency (IDeA).

**3.4** It is the view of the Society of District Council Treasurers (and of the other Treasurers' Societies) that the sector-led procurement by the PSAA is likely to be less resource intensive and likely to produce better outcomes. The PSAA have already contacted authorities for expressions of interest and formal invitations were issued on 27th October 2016.

**3.5** The date by which authorities will need to opt in to the appointing person arrangements is 9th

March 2017. It is therefore important that this issue is considered by Full Council at its February meeting.

**3.6** The main advantages of using PSAA are set out in its prospectus and are copied below; these can also be viewed as the disadvantages if the Council was to decide to undertake its own procurement.

- Assure timely auditor appointments
- Manage independence of auditors
- Secure highly competitive prices
- Save on procurement costs
- Save time and effort needed on auditor panels
- Focus on audit quality
- Operate on a not for profit basis and distribute any surplus funds to scheme members.

## 4. Alternative options

**4.1** An alternative option would be to establish an auditor panel and conduct a procurement exercise either alone or with other authorities e.g. our GO partner council's. This is not recommended as it will be a far more resource intensive process and, without the bulk buying power of the sector led procurement, would be likely to result in a more costly service.

## 5. Consultation

**5.1** The Audit Committee considered this report on 11th January 2017 and unanimously resolved that Council be recommended to opt in to the appointing person arrangements made by the Public Sector Audit Appointments (PSAA).

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| **Report author** | **Contact officer: Paul Jones paul.jones@cheltenham.gov.uk, 01242 264125** |
| **Appendices** | Appendix 1 – Risk Assessment<br><br>Appendix 2 – PSAA – Appointing Person – Frequently Asked Questions Duties and responsibilities |
| **Background information** | • PSAA Corporate Plan 2015 - 2018<br>• PSAA Prospectus<br>• PSAA invitation to opt in letter |

| The risk | | | | Original risk score (impact x likelihood) | | | Managing risk | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Risk ref. | Risk description | Risk Owner | Date raised | I | L | Score | Control | Action | Deadline | Responsible officer | Transferred to risk register |
| | If the Council decides not to opt in to the appointing person arrangements made by Public Sector Audit Appointments (PSAA) for the appointment of external auditors, then it would have to establish an auditor panel and conduct its own procurement exercise which could be more expensive, time consuming and lead to a lack of alignment with the other local authorities in respect of an approach to audit planning. | CBC Section 151 officer | December 2016 | 2 | 2 | 4 | Accept | Opt in to the appointing person arrangements made by Public Sector Audit Appointments (PSAA) for the appointment of external auditors. | 9/3/2017 | CFO | |

Public Sector Audit Appointments

**Appointing person: Frequently asked questions**

| Question | Response |
|---|---|
| 1. What is an appointing person? | Public Sector Audit Appointments Limited (PSAA) has been specified as an appointing person under the Local Audit (Appointing Person) Regulations 2015 and has the power to make auditor appointments for audits of the accounts from 2018/19 on behalf of principal local government bodies that opt in, in accordance with the Regulations. Eligible bodies are principal local government bodies listed in schedule 2 of the Local Audit and Accountability Act 2014. This includes county councils, district councils, London Borough councils, unitary authorities, metropolitan councils, police bodies, fire and rescue authorities, joint authorities, combined authorities, national park authorities, conservation boards, PTEs, waste authorities, and the GLA and its functional bodies.<br><br>The 'appointing person' is sometimes referred to as the sector-led body.<br><br>PSAA is a company owned by the LGA's Improvement and Development Agency (IDeA) and was established to operate the transitional arrangements following closure of the Audit Commission. |
| 2. When will invitations to opt in be issued? | The date by which principal authorities will need to opt into the appointing person arrangement is not yet finalised. The aim is to award contracts to audit firms by June 2017, giving six months to consult with authorities on appointments before the 31 December 2017 deadline. We anticipate that invitations to opt in will be issued before December 2016 at the latest. |

| Question | Response |
|---|---|
| | Authorities will have a minimum period of eight weeks to respond to the invitation.<br><br>In order to maximise the potential economies of scale from agreeing large contracts with firms, and to manage any auditor independence issues, PSAA needs as much certainty as possible about the volume and location of work it is able to offer to firms. Our provisional timetable suggests that we will need to start preparing tender documentation early in 2017, so we will need to know by then which authorities want to be included. |
| 3. Who can accept the invitation to opt in? | In accordance with Regulation 19 of the Local Audit (Appointing Person) Regulations 2015, a principal authority will need to make the decision to opt in at full council (authority meeting as a whole), except where the authority is a corporation sole (such as a police and crime commissioner), in which case the function must be exercised by the holder of the office. |
| 4. Can we join after it has been set up or do we have to join at the beginning? | The Regulations require that once the invitations to opt in have been issued, there will be a minimum period of eight weeks for you to indicate acceptance of the invitation. One of the main benefits of a an appointing person approach is the ability to achieve economies of scale as a result of being able to offer larger volumes of work. The greater the number of participants we have signed up at the outset, the better the economies of scale we are likely to achieve. This will not prevent authorities from joining the sector-led arrangements in later years, but they will need to make their own arrangements to appoint an auditor in the interim. In order to be in the best position we would encourage as many authorities as possible to commit by accepting the invitation within the specified timeframe. |

| Question | Response |
|---|---|
| 5. Will membership be free for existing members of the LGA? | The option to join the appointing person scheme will be open to all principal local government authorities listed under Schedule 2 of the Local Audit and Accountability Act 2014. There will not be a fee to join the sector-led arrangements. The audit fees that opted-in bodies will be charged will cover the costs to PSAA of appointing auditors and managing the arrangements. We believe that audit fees achieved through large contracts will be lower than the costs that individual authorities will be able to negotiate. In addition, by opting into the PSAA offer, authorities will avoid the costs of their own procurement and the requirement to set up an auditor panel with independent members. |
| 6. How will we be able to influence the development of the appointing person scheme and associated contracts with audit firms? | We have not yet finalised the governance arrangements and we are considering the options, including how best to obtain stakeholder input. We are considering establishing a stakeholder engagement panel or advisory panel which can comment on our proposals. PSAA continues to work in partnership with the LGA in setting up the appointing person scheme and you can feed in comments and observations to PSAA by emailing generalenquiries@psaa.co.uk and via the LGA and their Principal Advisors. |
| 7. Will there be standard contract terms and conditions? | The audit contracts between PSAA and the audit firms will require firms to deliver audits compliant with the National Audit Office (NAO) Code of Audit Practice. We are aware that authorities would like to understand how performance and delivery will be monitored and managed. This is one of the issues that could be discussed with the stakeholder advisory panel (see Q6). |
| 8. What will be the length of the contracts? | The optimal length of contract between PSAA and firms has not been decided. We would welcome views on what the sector |

| Question | Response |
|---|---|
| | considers the optimal length of audit contract. We anticipate that somewhere between three and five years would be appropriate. |
| 9. In addition to the Code of Audit Practice requirements set out by the NAO, will the contract be flexible to enable authorities to include the audit of wholly owned companies and group accounts? | Local authority group accounts are part of the accounts produced under the CIPFA SORP and are subject to audit in line with the NAO Code of Audit Practice. They will continue to be part of the statutory audit.<br><br>Company audits are subject to the provisions of the Companies Act 2006 and are not covered by the Local Audit (Appointing Person) Regulations 2015. Local authority companies will be able to appoint the same audit firm as PSAA appoints to undertake the principal body audit, should they so wish. |
| 10. Will bodies that opt in be able to seek information from potential suppliers and undertake some form of evaluation to choose a supplier? | PSAA will run the tendering exercise, and will evaluate bids and award contracts. PSAA will consult authorities on individual auditor appointments. The appointment of an auditor independently of the body to be audited is an important feature of the appointing person arrangements and will continue to underpin strong corporate governance in the public sector. |
| 11. Will the price be fixed or will there be a range of prices? | The fee for the audit of a body that opts in will reflect the size, audit risk and complexity of the work required. PSAA will establish a system for setting the fee which is fair to all opted-in authorities. As a not-for-profit organisation, PSAA will be able to return any surpluses to participating authorities after all costs have been met. |
| 12. We have shared service arrangements with our neighbouring bodies and we are looking to ensure that we share the same auditor. Will the appointing person scheme allow for this? | PSAA will be able to make appointments to all principal local government bodies listed in Schedule 2 of the Local Audit and Accountability Act 2014 that are ‘relevant authorities’ and not excluded as a result of being smaller authorities, for example parish councils. |

| Question | Response |
|---|---|
| | In setting up the new arrangements, one of our aims is to make auditor appointments that take account of joint working and shared service arrangements. Requests for the same auditor as other authorities will need to be balanced with auditor independence considerations. As we have set out in our prospectus, auditors must be independent of the bodies they audit. PSAA will have an obligation under the provisions of the Local Audit and Accountability Act 2014 and in compliance with the Ethical Standards issued by the Financial Reporting Council to ensure that every auditor appointment it makes passes this test. We will need information from opted-in authorities on potential independence considerations and joint working arrangements, and will also need information on independence issues from the audit firms. Risks to auditor independence include, for example, an audit firm having previously been engaged to advise on a major procurement which could, of course, later be subject to audit. |
| 13. We have a joint committee which no longer has a statutory requirement to have an external auditor but has agreed in the interests of all parties to continue to engage one. Is it possible to use this process as an option to procure the external auditor for the joint committee? | The requirement for joint committees to produce statutory accounts ceased after production of the 2014/15 accounts and they are therefore not listed in Schedule 2. Joint committees that have opted to produce accounts voluntarily and obtain non-statutory assurance on them will need to make their own local arrangements. |
| 14. How will the appointing person scheme ensure audit firms are not over-stretched and that the competition in the market place is increased? | The number of firms eligible to undertake local public audit will be regulated through the Financial Reporting Council and the recognised Supervisory Bodies (RSBs). Only appropriately accredited firms will be able to bid for appointments whether that is through PSAA or an auditor panel. The seven firms appointed by PSAA and the Audit Commission generally |

| Question | Response |
|---|---|
| | maintain a dedicated public sector practice with staff trained and experienced in public sector work.<br><br>One of the advantages of the appointing person option is to make appointments that help to ensure that each successful firm has a sufficient quantum of work to make it possible for them to invest in public sector specific training, maintain a centre of excellence or hub that will mean:<br>• firms have a regional presence;<br>• greater continuity of staff input; and<br>• a better understanding the local political, economic and social environment. |
| 15. Will the appointing person scheme contract with a number of different audit firms and how will they be allocated to authorities? | PSAA will organise the contracts so that there is a minimum number of firms appointed nationally. The minimum is probably four or five (depending on the number of bodies that opt in). This is required, not just to ensure competition and capacity, but because each firm is required to comply with the FRC's ethical standards. This means that an individual firm may not be appointable for 'independence' reasons, for example, because they have undertaken consultancy work at an audited body. PSAA will consult on appointments that allow each firm a balanced portfolio of work subject to independence considerations. |
| 16. What will be the process to feed in opinions from customers of current auditors if there are issues? | PSAA will seek feedback on its auditors as part of its engagement with the sector. PSAA will continue to have a clear complaints process and will also undertake contract monitoring of the firms it appoints. |
| 17. What is the timetable for set up and key decisions? | We expect the key points in the timetable to be broadly: |

| Question | Response |
|---|---|
| | • establish an overall strategy for procurement - by 31 October 2016;<br>• achieve 'sign-up' of scheme members - by early January 2017;<br>• invite tenders from audit firms - by 31 March 2017;<br>• award contracts - by 30 June 2017;<br>• consult on and make final auditor appointments - by 31 December 2017; and<br>• consult on, propose audit fees and publish fees - by 31 March 2018. |
| 18. What are the terms of reference of the appointing person? | PSAA is wholly owned by the IDeA (the IDeA is wholly owned by the LGA). PSAA will continue to operate as an independent company, although there will be changes to its governance arrangements and its founding documents to reflect the fact that it will be an appointing person rather than a transitional body. |
| 19. Will the appointing person take on all audit panel roles and therefore mitigate the need for there to be one in each individual authority? | Opting into the appointing person scheme will remove the need to set up an auditor panel. This is set out in the Local Audit and Accountability Act 2014 and the Local Audit (Appointing Person) Regulations 2015. |

| Question | Response |
|---|---|
| 20. What will be the arrangements for overseeing the quality of audit work undertaken by the audit firms appointed by the appointing person? | PSAA will only contract with firms which have a proven track record in undertaking public audit work. In accordance with the 2014 Act, firms must be registered with one of the chartered accountancy institutes acting in the capacity of a Recognised Supervisory Body (RSB). The quality of their work will be subject to scrutiny by both the RSB and the Financial Reporting Council (FRC). Current indications are that fewer than ten large firms will register meaning that small local firms will not be eligible to be appointed to local public audit roles.<br><br>PSAA will ensure that firms maintain the appropriate registration and will liaise closely with RSBs and the FRC to ensure that any concerns are detected at an early stage and addressed effectively in the new regime. The company will take a close interest in feedback from audited bodies and in the rigour and effectiveness of firms' own quality assurance arrangements, recognising that these represent some of the earliest and most important safety nets for identifying and remedying any problems arising. We will liaise with the NAO to help ensure that guidance to auditors is updated when necessary. |

# Cheltenham Borough Council

## Council – 10th February 2017

## Gloucester, Cheltenham and Tewkesbury Joint Core Strategy

## Main Modifications Report

## REPORT OF THE LEADER

| | |
|---|---|
| **Accountable member** | Councillor Jordan – Leader |
| **Accountable officer** | Tracey Crews – Director of Planning |
| **Ward(s) affected** | ALL |
| **Key/Significant Decision** | YES |
| **Executive summary** | The Joint Core Strategy (JCS) is the strategic planning document being prepared jointly by Gloucester City, Cheltenham Borough and Tewkesbury Borough Councils to provide a framework for meeting the development needs of the area over the plan period from 2011 to 2031.<br><br>**The proposed Main Modifications to the JCS formulated following the July 2016 hearings were agreed at the October 2016 Council meetings by Gloucester City and Cheltenham Borough councils.**<br><br>The agenda, documents and minutes of the Cheltenham Borough Council meeting are available here: https://democracy.cheltenham.gov.uk/ieListDocuments.aspx?CId=143&MId=2646&Ver=4<br><br>**However the Main Modifications were not agreed by Tewkesbury Borough council.** Instead Tewkesbury Borough Council resolved that officers bring back to their Council for approval proposed main modifications to the June 2014 Pre-Submission Gloucester, Cheltenham and Tewkesbury Joint Core Strategy which do not include Twigworth as part of the Innsworth/Twigworth strategic allocation. This would impact on the Gloucester housing supply.<br><br>Subsequent to all the Council meetings in October, a letter from the Defence Infrastructure Organisation dated 28th October 2016 (now examination document EXAM 262) was received confirming that following a recent assessment there was a **continued Defence requirement for a significant portion of the MoD Ashchurch site for at least the next 10 years.** This results in a significant loss of |

housing supply for Tewkesbury council.

**Both these events** and further clarification obtained since the Council meetings in October 2016 (in particular on flooding issues in respect of the Twigworth site) **have required officers to make changes to the JCS** and the proposed Main Modifications needed to make the plan sound.

**The amended proposed Main Modifications in the light of these events are therefore the subject of this repor**t. The amended proposed Main Modifications set out in Appendix 1 and 1A **remove MoD Ashchurch** as a strategic allocation and **include the site at Twigworth** (but at a reduced indicative capacity of 995 dwellings, rather than 1,363 dwellings).

Subject to approval by all three Councils, the proposed Main Modifications will be subject to a formal **consultation for a period of six weeks during February to March/April 2017** (dates to be confirmed).

**The Inspector will receive the full responses to this consultation** and consider them in late Spring 2017. The Inspector has already confirmed that **further hearings on the proposed Main Modifications will take place after the public consultation**.

The amended proposed Main Modifications at Appendix 1 and 1A have also been considered by Gloucester City Council on the 6th February and by Tewkesbury Borough Council on 31st January (with the proposed Main Modifications appended as Appendix 1 and 1A to this report appearing as Appendix 2 and 2A in the report to Tewkesbury Borough Council).

In accordance with Tewkesbury Borough Council's resolution on 25th October 2016, amended proposed Main Modifications without a Twigworth allocation have also been produced (not appended to this report) for the meeting at Tewkesbury Borough Council on 31st January 2017. Officers, have advised that there are likely to be soundness issues with that approach.

The following appendices are appended to and referred to in the report:

Appendix 1: Table of Proposed Main Modifications

Appendix 1A: Modification Maps

Appendix 2: Superseded Policies

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| **Recommendations** | **The Council is asked to:**<br>(1) Approve for public consultation the proposed main modifications to the June 2014 Pre-Submission Gloucester, Cheltenham and Tewkesbury Joint Core Strategy as set out in Appendix 1 to this report (including proposed modifications to the Proposals Map and Key Diagram) as those it endorses and considers necessary to make the JCS sound<br><br>(2) Delegate authority to the Director of Planning of Cheltenham Borough Council in consultation with the Leader of Cheltenham Borough Council to make minor changes to the proposed main modifications and proposed modifications to the Proposals Map and Key Diagram) in terms of formatting, presentation and accuracy |

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| **Financial implications** | The 2016/17 Budget Setting Report Growth Summary (Appendix 4) included a contingency of £50k to be funded from General Balances to complete the examination process and implement CIL as recommended by Cabinet on 14th December 2015.<br><br>This contingency has been taken from general balances in the current year to fund the council's contribution to the process in accordance with the resolution of Council in June 2016.<br><br>*An earmarked reserve of £68,780 is in place that can be drawn upon to support any further costs incurred over and above the annual £60k contribution per partner council and the one-off growth mentioned above agreed in 2016/17.* **Contact officer: Myn Cotterill Myn.Cotterill@cheltenham.gov.uk, 01242 774958** |

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| **Legal implications** | The purpose of the examination of the JCS is to assess whether the JCS has been prepared in accordance with the duty to co-operate, legal and procedural requirements and whether it is sound (as set out in paragraph 182 of the National Planning Policy Framework ("NPPF"). A local planning authority should only submit a plan which it considers sound. The JCS was submitted for examination on 20th November 2014.<br><br>The Pre-Submission Version of the JCS (June 2014) ("June 2014 JCS") was the publication version upon which representations were made. The Inspector considered that the subsequent changes (which have not yet undergone public consultation) as set out in the Submission Version of the JCS (November 2014) go beyond what would fall within the category of minor amendments. Therefore the Inspector has been considering the June 2014 JCS during the examination rather than the Submission Version of the JCS (November 2014).<br><br>The Inspector has indicated that she is minded to find a number of the policies in the June 2014 JCS unsound; during the hearings and also initially within her Preliminary Findings dated 16th December 2015, and subsequently within her Interim Report dated 26th May 2016, which has been followed up by her Note of Recommendations made at the hearing on the 21st July 2016 (dated 25th July 2016)<br><br>The Inspector is therefore indicating that she would not be able to recommend that the June 2014 JCS is adopted without modifications and that the JCS can only be found to be sound with main modifications. The Inspector has invited the JCS team to draft a set of main modifications, including those which have already been discussed during previous hearings, those which flow from the Interim Report recommendations, those discussed during the July 2016 hearings (which were held for the Inspector to discuss the implications of the Interim Report with the JCS authorities in terms of any queries or complications they may have had in advance of preparing modifications) and those within the Inspector's Note of Recommendations made at the hearing session on 21st July 2016.<br><br>Once the proposed modifications as detailed within Appendix 1 are approved for consultation, though still not representing the policies of an adopted plan, these will then form part of the emerging plan policies as the JCS Councils are seeking to be found sound and capable of adoption. It will be for the Inspector to set out in her Final Report, whether she is satisfied that the plan can be made sound with main modifications and if so, the exact wording of main modifications to be made.<br><br>Under section 23 of the Planning and Compulsory Purchase Act 2004, it is not possible to adopt a development plan document that an Inspector has only found to be sound with main modifications, without all the main modifications as recommended in an Inspector's Final Report. Save for any minor amendments, which (taken together) do not materially affect the policies set out in the development plan document; the wording must be as the main modifications set out within the Final Report.<br><br>**Contact officer: Solicitor, cheryl.lester@tewkesbury.gov.uk, 01684 272 013** |

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| **HR implications (including learning and organisational development)** | No direct HR Implications arising from the report<br><br>**Contact officer: GO SS HR Manager, julie.mccarthy@cheltenham.gcsx.gov.uk, 01242 264 355** |
| **Key risks** | Delay to the progress of the Joint Core Strategy examination and adoption of the plan means that the Council will not have an up to date local plan for the area. The absence of the Joint Core Strategy could result in an uncoordinated approach to development, leading to inappropriate and incremental development being allowed on appeal that does not take account of cross boundary implications and requirements for supporting infrastructure, with the potential for adverse environmental impacts. There are applications already submitted relating to strategic sites identified through the JCS and other major applications pending that are being hindered by delays in progressing the plan. It is therefore critical that examination is advanced as quickly as possible.<br><br>The recent government consultation response on New Homes Bonus indicates that there is still a significant risk of losing the bonus in relation to new development if the JCS authorities were to halt plan making or if the JCS was to fail to progress towards adoption in 2017. The Government has already announced within its Provisional 2017-2018 Local Government Finance Settlement that it intends to introduce a baseline for housing growth set at an initial baseline of 0.4% of the council tax base for 2017-18. Housing growth below this level in each authority will not receive bonus allocations. From 2018-19 it will consider withholding New Homes Bonus payments from local authorities that are not planning effectively, by making positive decisions on planning applications and delivering housing growth. In addition, a written statement by the Housing & Planning Minister on 21st July 2015 set out that in cases where no Local Plan has been produced by early 2017 the government will intervene to arrange for the Plan to be written. |
| **Corporate and community plan Implications** | The JCS supports and is referenced by the Corporate Strategy and wider community planning. The plan making process is open to all parties of the formal consultation processes. |

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| **Environmental and climate change implications** | Delay to the progress of the Joint Core Strategy could further result in an uncoordinated approach to development. It is important that future growth is plan-led to ensure that combined impacts on the environment and the infrastructure needs of the wider area are taken into account. The comprehensive approach to environmental impacts cannot be fully assessed through incremental and piecemeal growth. The JCS is being assessed through a sustainability appraisal process and Habitats Regulation Assessment (HRA) which consider the environmental, social and economic outputs of the Plan and ensure that development meets the needs of both present and future generations. The Sustainability Appraisal supporting the JCS encompasses Strategic Environmental Assessment as required by EU Directive (2001/42/EC). In addition HRA has been undertaken as required under the European Directive 92/43/EEC on the "conservation of natural habitats and wild fauna and flora for plans" that may have an impact on European (Natura 2000) Sites. The JCS Sustainability Appraisal as amended is available at www.gct-jcs.org |
| **Property/Asset Implications** | The removal of the Green Belt between the West and North West Cheltenham Strategic Allocations comprises land which is owned by the Borough including the site known as 'Arle Nurseries' (which straddles the administrative boundaries of Cheltenham Borough and Tewkesbury Borough). Whilst this site is not allocated through the Joint Core Strategy, its removal from the Green Belt could facilitate its allocation through the Cheltenham Plan. Removal from the Green Belt would increase the likelihood that new development could take place on this land. Any proposal would need to be sustainable and in accordance with the development plan as a whole, with particular evidence being required in relation to flood risk.<br><br>**Contact officer: Head of Property**<br><br>**David.Roberts@cheltenham.gov.uk, 01242 264151** |

## 1. Background

**1.1** On the 31st May 2016 the JCS Councils received the Inspector's Interim Report regarding her examination of the JCS up to that date. The Inspector's Interim Report was published as EXAM232 and is available to view at:

http://www.gct-jcs.org/Documents/Examination-Document-Library-6/EXAM232---JCS-Inspectors-Interim-Findings---31052016.pdf

Council met on the 30th June 2016 to review those findings and resolved to:

- Note the Interim Report of the Inspector;

- Agree that the JCS officers attend the July hearings to discuss the Interim Report and the recommended way forward with the Inspector, identifying specific consequences and key points arising from the findings to the Inspector

• Agree that a summary of comments made by Members at the Council meetings held by the JCS Authorities be passed to the JCS Inspector for consideration.

**1.2** Cheltenham Borough Council also resolved to undertake an urgent review on Local green Space for those areas now affected by the Inspectors interim findings. During July 2016 hearings were held in light of the Interim Report, and the resolutions of Council above. These hearings covered issues such as which strategic allocations should be included in the JCS, safeguarded land, further evidence on retail, a further site visit to Leckhampton, the JCS housing trajectory and Local Green Space. The hearings agenda is available to view at: http://www.gct-jcs.org/Documents/Examination-Document-Library-6/Agenda-for-JCS-hearings-on-6-and-7-July-2016.pdf and http://www.gct-jcs.org/Documents/Examination-Documents-Library-7/Agenda-JCS-Hearings-19-21-July.pdf

**1.3** On the last day of the July hearings, 21st July 2016, the Inspector made a statement on progress of the examination and the next steps to be taken. The Inspector's Note of Recommendations made at the hearing session on 21st July 2016 was subsequently published as EXAM 259 and is available here: http://www.gct-jcs.org/Documents/Examination-Documents-Library-7/EXAM-259---Inspectors-Note-of-Recommendations-from-21-July-2016.pdf

**1.4** In the Inspector's Note of Recommendations, she requested that Main Modifications be made available for her by Monday the 19th September 2016 for checking.

**1.5** Consequently, the JCS officer team has formulated the proposed Main Modifications on the following basis:

- Those suggested by the JCS Councils during the hearing process in evidence either in response to the Inspector's questions or in response to matters raised by those making representations on the plan (including through Statements of Common Ground).
- Those identified through the Inspector's Interim Report and Note of Recommendations.
- To address the issues raised subsequent to the October 2016 Councils, which are the focus of this report

**1.6** It should be noted that the Inspector is only required to be concerned with matters associated with the soundness of the JCS and not with simply trying to improve the emerging plan. It can therefore be assumed that where Main Modifications are recommended these are required to make the Plan sound.

## 2. Reasons for recommendations

**2.1** A large number of changes are proposed through the Main modifications and the majority have already been seen by council and were agreed at the Council meeting of the 18th October 2016. The amended Main Modifications to be agreed are set out in Appendix 1. The changes made to the proposed Main Modifications arise from the Twigworth strategic allocation and MoD Ashchurch issues. These and their implications have been summarised below for consideration at this council meeting.

**2.2** To advance the JCS from here, the three JCS authorities need to approve the amended proposed Main Modifications which will be subject to formal public consultation. The Inspector needs to be satisfied that any recommendations made in the Inspector's Final Report, being ones that make the plan sound, have been sufficiently consulted upon. It is not lawful to adopt a Plan as originally submitted where an Inspector has required modifications to be made for the Plan to be sound. It

will only be possible to adopt a Plan, which includes all the main modifications the Inspector recommends within the Final Report.

Twigworth Strategic Allocation

**2.3** The Inspector recommended within her Interim Report that a site at Twigworth should be allocated for housing-led development of at least 750 dwellings (the Inspector having in error referred to the existing outline application as being for 750 dwellings, which actually relates to the application for 725 dwellings), with further capacity to be investigated by the JCS authorities.

**2.4** Following, the Tewkesbury Council resolution on 25th October, the JCS authorities have undertaken further evidence base work on the Twigworth site to assess its deliverability and sustainability. This has included sustainability appraisal, landscape and visual sensitivity assessment, historic environment assessment, transport modelling and a strategic flood risk assessment. The evidence reports can be viewed on the JCS website: http://www.gct-jcs.org/New-Evidence-Base-and-Associated-Documents/New-Evidence-Base.aspx

**2.5** The results of this work presented no evidence-based reason to suggest that an allocation at Twigworth is not deliverable. This additional assessment for Twigworth also concluded that there are no overriding flooding issues which would prevent the land being allocated for development.

**2.6** However, the report did make suggested changes to the developable area of the site based on information from modelling and flood flow data and the latest guidance from the Environment Agency regarding climate change. The report also recommends additions to JCS policy INF3 Flood Risk to strengthen the guidance, which is elaborated on in paragraph 2.15 below. The full report can be viewed on the JCS website. The residential capacity is now assumed to be 995 dwellings, reduced from 1,363 dwellings that was the previously assumed capacity of the allocation

MoD Ashchurch Strategic Allocation

**2.7** The MoD Ashchurch site was a strategic allocation in the June 2014 Pre-Submission JCS and was expected to deliver 2,125 dwellings (later increased to 2,225 dwellings) and 20ha of employment land over the plan period to 2031, plus a further 500 dwellings post-2031. However in October 2016 confirmation was received from the Defence Infrastructure Organisation (DIO) that there is a continued requirement for land within the MoD site for at least the next 10 years. As such it is the intention of the MoD to retain all but the eastern section of the site.

**2.8** This eastern area comprises of 15.8ha which could be released for development from 2023/24 for approximately 400 dwellings. In addition, there is land within the strategic allocation beyond that which is owned by the MoD that has the potential to deliver up to 1,100 dwellings. The challenge for the remaining parcels of available land is around access, masterplanning, place making and infrastructure provision. These issues currently present some uncertainty that the sites could be sustainably developed and places questions on their deliverability. Therefore, the Main Modifications proposed include the removal of the MoD Ashchurch site in its entirety as a strategic allocation at the present time.

Gloucester City Housing Shortfall

**2.9** Gloucester City has an identified shortfall against the total JCS housing requirement of 1,313 dwellings (this would be 2,308 dwellings without the Twigworth Strategic Allocation). Despite this shortfall, Gloucester City can on adoption maintain at least a 5.8 years supply of housing land and sufficient sites to delivering housing in the short to medium term. However, it is critical that the shortfall is still addressed over the plan period in a strategic and plan-led way.

Tewkesbury Borough Housing Shortfall

**2.10** Tewkesbury Borough has an identified shortfall against the total JCS housing requirement of 2,843 dwellings, largely due to the removal of the MoD Ashchurch site. However, despite this shortfall, Tewkesbury Borough can maintain at least a 5.3 years supply of housing land and sufficient sites to deliver housing in the short to medium term. However, it is critical that the shortfall is still addressed over the plan period in a strategic and plan-led way.

Delivery, Monitoring and Review Section

**2.11** The proposed Main Modifications therefore set out additional changes to the Delivery, Monitoring & Review section of the JCS to provide a commitment to undertaking a partial early review of Gloucester's housing supply and a partial immediate review of Tewkesbury's housing supply following the adoption of the plan. These reviews will allow consideration of any other development options that become available, both within and outside the JCS area.

**2.12** This would allow further exploration of potential early delivery of sites at MoD Ashchurch as well as any wider potential within the Tewkesbury town and Ashchurch area, including opportunities and constraints presented by improvements to the M5 Junction 9 and A46.

**2.13** The partial early review of Gloucester's housing supply would include further development opportunities within the urban area that are not currently deliverable, as well as the potential for new urban extensions in Tewkesbury Borough and Stroud District. As such, it is important that any review is undertaken in tandem with the review of the Stroud Local Plan so that all potential development alternatives are comprehensively explored through the plan-making process.

Summary of the Amended Proposed Main Modifications

**2.14** Additional modifications to the JCS have been proposed following the last report to Council on 24 October 2016. These modifications have been included to add further clarity, strength and detail to certain policies in order for them to guide sustainable development.

**2.15** Policy INF3: Flood Risk now includes additional guidance following the recommendations from the Thomas Consulting report on flooding. Significantly this includes a requirement that planning applications take into account the latest available flood modelling and flows to justify the flood zones used for a development. It also sets out that development will need to compensate for pluvial flood storage lost through any development.

**2.16** Policy SD13: Affordable Housing has been amended to provide clarity that sites (outside of strategic allocations) with a maximum combined gross floor space of greater than 1,000 sqm will be required to provide 40% affordable housing in Cheltenham and Tewkesbury, and 20% in Gloucester. The policy also clarifies that, for sites of 10 or less dwellings, further affordable housing guidance may be provided through district-level plans.

**2.17** Policy SP2: Spatial Strategy has been amended to reflect the changing housing and employment delivery from proposed strategic allocations taking into account the changes brought about through the MoD Ashchurch and Twigworth strategic allocations.

**2.18** Mapping changes have also been necessary to reflect changes in proposed strategic allocations and these are provided at Appendix 1A.

**2.19** In summary, the following proposed main modifications have been amended following the last

report to Council:

PMM014: referencing clarification

PMM017: referencing clarification

PMM018: referencing clarification

PMM020: Policy SP2 changes to strategic allocations and housing supply figures

PMM021: Policy SP2 explanatory text change to strategic allocations and housing supply figures

PMM023: Policy SP2 explanatory text change to Gloucester and Tewkesbury housing shortfall

PMM024: referencing clarification

PMM025: Policy SP2 explanatory text change to employment delivery from strategic allocations

PMM026: Policy SP2 explanatory text change to remove reference to MoD Ashchurch allocation

PMM028: Policy SP2 housing supply tables (SP2a) change to delivery from strategic allocations

PMM029: Policy SP2 strategic allocation supply table (SP2b) change

PMM034: numbering clarification

PMM035: Policy SD2 clarification on Gloucester urban regeneration

PMM039: Policy SD3 wording change to policy 5.iii. to support regeneration strategies

PMM070: Policy SD13 change to clarify guidance on site area affordable housing thresholds and approach to small sites

PMM0084a: Policy INF3 additional policy wording to require latest available updates to flood modelling to be taken into account

PMM0085a: Policy INF3 explanatory text new addition to support need for requirement for latest available flood modelling

PMM0086: Policy INF3 explanatory text additional flood guidance to cover surface water storage and flood management

PMM0103: Policy SA1 strategic allocations table (SA1) change to reflect strategic allocations

PMM0106: Policy A1 changed to reflect the reduced capacity of Twigworth to 995 dwellings and to add text in respect of flooding management

PMM0114: Policy A8 removed to reflect removal of MoD Ashchurch strategic allocation

PMM0123: Delivery, Monitoring and Review section addition of titles to text

PMM0123a: Delivery, Monitoring and Review section additional text regarding early review of Gloucester's housing supply

PMM0123b: Delivery, Monitoring and Review section additional text regarding immediate review of Tewkesbury's housing supply

PMM0125: Delivery, Monitoring and Review section updated with latest housing trajectory charts and calculations for Gloucester

PMM0127: Delivery, Monitoring and Review section updated with latest housing trajectory charts and calculations for Tewkesbury

PMM0128: Delivery, Monitoring and Review section updated with strategic allocation trajectory

PMM0134: Maps (at Appendix 1A) updated to reflect changes to strategic allocations

PMM0135: List of existing policies that would be superseded by JCS proposed policies (at Appendix 2)

Stepped Trajectories

**2.20** A stepped trajectory can be used when a local authority identifies that it can deliver an amount of housing required by the plan, but only over a longer period than would normally be required. The 'step' means that the demand figure is reduced in the early part of the plan, and then increased in the later period of the plan to marry need with delivery. This ensures a constant five year supply.

**2.21** The inspector confirmed in her Note of Recommendations made at the hearing session on 21st July 2016 that stepped trajectories may soundly be used in the JCS implementation strategy subject to robust justification. A stepped trajectory was already included within the proposed main modifications presented to the Councils in October in respect of Cheltenham. The basis for this is that completions are lower early in the plan period because strategic allocations have not yet started delivering. Higher targets can be met in later years because, by that time, strategic allocations will be fully delivering. Similarly, a stepped trajectory is now proposed in respect of Tewkesbury for the middle years of the plan in order to allow sufficient time for the immediate review to be undertaken with the expectation that sites identified as part of the immediate review will be able to deliver those earlier requirements which were reduced by a step, by the latter years of the plan period.

## 3. Alternative options considered

**3.1** There is no reasonable alternative to deciding whether the amended proposed Main Modifications for soundness set out in the appendices are acceptable to the Councils at this stage of the plan making process.

## 4. Consultation and feedback

**4.1** Public consultation on the JCS has been extensive throughout its development, with the key consultation stages including:

- Key Issues & Questions – November 2009/February 2010
- Developing the Preferred Option – December 2011/February 2012
- Draft JCS – October/December 2013

**4.2** The Pre-Submission (June 2014) version of the plan was consulted upon during summer 2014 and the Submission JCS (November 2014), which included amendments with the Inspector subsequently considered to go beyond minor amendments was submitted to the Secretary of State for its examination in public. The representations to the Pre-Submission (June 2014) JCS were referred to the Inspector for consideration as part of the examination process and it is the

Pre-Submission (June 2014) version which the Inspector has been examining.

**4.3** The examination has been held in public with extended examination around key parts of the plan such as the Objectively Assessed Need, Economic Strategy, strategic sites and local green space. Some Cheltenham members (as members of Parish Councils/other bodies) have played an active role in the examination sessions. Those who responded to the Pre-Submission consultation have been able to submit evidence to the examination and appear at hearing sessions.

**4.4** The JCS Member Steering Group has reviewed the majority of the proposed modifications and their justification together with direct engagement with the Leaders of the JCS authorities. Progress of the JCS examination has been reported regularly to the Planning and Liaison Member Working Group.

## 5. Performance management –monitoring and review

**5.1** Council approval is sought on the amended proposed Main Modifications plan for it to undergo a formal public consultation period expected to take place for 6 weeks on dates to be confirmed during February 2017 to March/ April 2017.

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| **Report author** | **Contact officer: Development Manager – Strategy, philip.stephenson@cheltenham.gov.uk, 01242 264 379** |
| **Appendices** | 1. Table of Proposed Main Modifications<br>1A. Modification Maps<br>2. List of Superseded Policies<br>3. Risk Assessment |

## JCS Table of Main Modifications

**Explanation of columns**

| **Column Number** | **1** | **2** | | **4** |
|---|---|---|---|---|
| **Column title** | **Proposed Modification number** | **Paragraph in Pre-Submission JCS** | **JCS Pre-Submission original text with track changes** | **Reason** |
| **Column Description** | Column contains reference for each modification<br><br>Reference coding:<br><br>PMM 0001<br><br>(sequential) | Column identifies the paragraph or policy to which the modifications relate where appropriate<br><br>Section or policy;<br><br>Paragraph or other when appropriate | Column identifies the part of the text within the JCS Pre-Submission version to which the main modification relates.<br><br>Text to be deleted is ~~'struckthrough'~~ and *new text to be added is in red and italics.*<br><br>Text that remains in black is not changed from the Pre-Submission version.<br><br>E.g.<br><br>~~Housing~~ *Employment* led development is expected to generate ~~minimal~~ *substantial* growth<br><br>**NOTE PARAGRPAH NUMBERING IS NOT CORRECT DUE TO DELETIONS/ADDITIONS** | Column explains the reason for the change |

## JCS Table of Main Modifications

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
|---|---|---|---|
| PMM001 | Part 2<br>2.1 | ***The Gloucester City Vision 2012-2022***<br>Gloucester will be a flourishing, modern and ambitious City, which all residents can enjoy. *We will work to encourage sustainable economic growth for the City's expanding population by driving forward its regeneration programme. This will strengthen the City, particularly its centre and make the most of our infrastructure.* | Text added to update the City Vision |
| PMM002 | Part 2<br>2.4 | By 2031 Gloucester will have established its historic central core as a place for inward investment and opportunity. Key urban sites, including King's Square, Greater Blackfriars, Greater Greyfriars and the railway corridor, will have been successfully regenerated to provide new jobs and housing within central areas of the City to meet the needs of its naturally growing population and to encourage inward investment. The King's Quarter regeneration will have played a key role in increasing the vitality and viability of the City centre environment ~~and~~ shopping and *leisure* experience, combined with improved pedestrian, cycle and public transport improvements, *including a new bus station*. A vital and viable City centre will have raised Gloucester's profile as a strong, well-connected and resilient location where people will be proud to live and work in the economic and administrative capital of Gloucestershire. | This section updated to reflect the ongoing work at Kings Quarter. |
| PMM003 | Part 2<br>2.23 | Areas of the borough which lie at the edges of Gloucester and Cheltenham will play an important role in accommodating development through urban extensions. ~~to meet the needs of all three authorities~~. | This text deleted because of the changes to the apportionment mechanism in the JCS post interim report. |
| PMM004 | Part 2<br><br>Para 2.29 | Gloucester and Cheltenham are the main economic hubs for Gloucestershire and draw in a significant number of commuters. This places a considerable strain on the central areas in terms of traffic congestion and pollution. Increasing self-containment remains a key challenge for the area. Offering alternative modes of transport ~~(such as cycling or buses)~~ is easier to achieve in the major urban areas which are compact and thus offer potential for improvements to *public transport,* local cycling and | |

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
|---|---|---|---|
| | | pedestrian links. However, in the rural areas, maintaining and improving public transport is more challenging.<br><br>*A further key challenge in meeting the objectively assessed need for development in the JCS area is the degree to which land within the JCS area is significantly constrained by flood plain, areas of Green Belt and the Cotswolds Area of Outstanding Natural Beauty (AONB). The JCS authorities have reviewed the capacities of their urban areas, i.e. those sites which already have planning permission or which are part of planned regeneration, and found they can support just over 60% of the identified need.*<br><br>*While early consultations examined the possibility of focussing development solely on urban areas this was predicted to lead to adverse consequences to the economic growth of the area, and would be likely to result in harm to the amenity of the City and town through increases in density and the loss of open spaces. Through consultation the possibility of a new town taking the remainder of the development need, creating sustainable urban extensions to the existing City and town areas, or dispersing new development throughout all settlements in the area have been considered as options and tested through the Sustainability Appraisal. All of these potential solutions would lead to the development of areas currently within the Green Belt or AONB. The solution of identifying and allocating strategic allocations closest to where the development need is generated has been found to be the most sustainable and strongly supported through consultation. However, this has meant that in order to release land for development the existing Green Belt has been reviewed and a new Green Belt boundary has been required, creating new and lasting defensible boundaries for the designation.* | Wording added to identify flood plain, AONB and Green Belt as key challenges to meeting need in the JCS area and how the spatial strategy sought to address these constraints. |
| PMM005 | Strategic Objective 1 new bullet point | **Ambition 1 – a thriving economy**<br>***Strategic Objective 1 – Building a strong and competitive urban economy***<br><br>• *Increasing access to high speed broadband for both urban and rural areas, to drive investment and employment opportunities and to enhance quality of life and access to services* | Objective 1, Provision of high speed broadband emphasised as an important part of economic growth. To reflect this, it is now specifically mentioned as a |

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| | | | plan objective, whereas before it was a monitoring indicator. This reflects the inspector's remarks on this topic during examination. |
| PMM006 | Strategic Objective 4 & 6<br>4th bullet point<br><br>4th bullet point | **Ambition 2 – a sustainable natural, built and historic environment**<br>***Strategic Objective 4 – Conserving and enhancing the environment***<br><br>• Within the ~~JCS~~ *Development Plan*, review the current Green Belt boundary with a view to releasing land to help meet the long-term development needs of the area that cannot be accommodated elsewhere, whilst providing a long-term permanent boundary for the future.<br><br>***Strategic Objective 6 – Meeting the challenges of climate***<br>• Encouraging and facilitating ~~the development of~~ low- and zero-carbon energy development and *the* implementation of Sustainable Drainage Systems (SUDS) ~~in accordance with existing standards and, where appropriate, exceeding them.~~ | Objective 4 – Change to "Development Plan" to indicate that district plans can also make local changes to the Green Belt as per the revised policy SD6<br><br>Objective 6, Changed to reflect changes in national policy and guidance on the role of planning in regard to this topic. |
| PMM007 | Strategic Objective 7, 8 & 9 | **Ambition 3 - a healthy, safe and inclusive community**<br>***Strategic Objective 7 – Promoting sustainable transport***<br><br>Reduce the need to travel and the reliance on the car by:<br><br>• Improving opportunities for *public transport,* walking and cycling by making routes more convenient, safe and attractive<br><br>• *Improving existing and* providing *new* frequent public transport links and safe walking and | Objective 7 amended to strengthen the ambition to improve opportunities for public and sustainable transport. |

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| | | cycling routes in all new developments<br>• Improving access to services in rural and urban areas through new development, improved integrated transport links and supporting local and community led transport initiatives *in the Local Transport Plan throughout the JCS area*<br>• *Promoting bus priority on key public transport corridors identified in the Local Transport Plan throughout the JCS area.*<br>***Strategic Objective 8 – Delivering a wide choice of quality***<br>• Delivering*, at least,* a sufficient number of market and affordable ~~housing~~ *houses*<br>***Strategic Objective 9 – Promoting healthy communities***<br>• In partnership with others, creating stronger communities by reducing inequality and social exclusion*, enhancing opportunities for high quality education,* and thereby increasing social well-being<br>• In partnership with others, encouraging healthy lifestyles and a well society through access to key community facilities and services, *including sport, recreation and leisure facilities,* open spaces and sustainable transport*, including public transport.* | Strategic Objective 8, clarifying that housing provision is "at least" in accordance with NPPFs requirement to provide a wide choice of high quality homes.<br>Objective 9, additional text further emphasising the role of education, sport and public transport in promoting healthy communities. |
| PMM008 | 3.1.1 | **PART 3 -** ***The JCS Spatial Strategy*** ~~**Strategic Policies**~~<br>This part sets out key ~~strategic~~ spatial policies for the JCS area. Policy SP1 sets out the overall strategy | Title change to reflect that all policies in the plan are strategic and this policy sets out the spatial |

## JCS Table of Main Modifications

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| | | concerning the amount of development required, and Policy SP2 sets out the distribution of new development. These two policies, combined with Policy SD2 on the economy, provide the spatial strategy for the plan. This strategy, together with its aims, is expressed in relevant policies throughout the plan and will be supported by forthcoming district plans and neighbourhood plans. Each policy highlights which of the strategic objectives it addresses. | strategy for development. |
| PMM009 | 3.1.5 | ~~The latest Department for Communities and Local Government (DCLG) household projections indicate that the baseline demographic projection for the JCS area is 28,500 new homes. Whilst this provides the starting point in assessing the level of future needs, the JCS has not used this to define the OAN for the area, as this level of growth assumes that there will be no increase in household formation levels over the plan period to 2031. This is an unlikely scenario. The current rate of household formation is a reaction in part to the recession, but over time the economic climate is likely to improve and the difficulties in the housing market should ease. This will enable young adults who have been particularly disadvantaged by the recession - currently living with parents or sharing accommodation - to form their own households.~~ | Text deleted and updated position on OAN is presented in the following and explanatory text. |
| PMM010 | 3.1.6 | The plan must be based on up-to-date evidence. The OAN for the JCS has been independently assessed by consultants Nathaniel Lichfield & Partners (NLP) and the Cambridge Centre for Housing and Planning Research (CCHPR). In considering this evidence, the JCS authorities have concluded that the OAN for the JCS area is *33,500* ~~within a range of about 30,500 to 38,000~~ dwellings and *a minimum of 192 hectares of B-class employment land to support approximately 39,500 new jobs* ~~about 21,000 to 28,000 jobs~~. This level of development would reflect both demographic and economic projections *and aspirations*, and is considered to be a sensible assessment of both the future housing needs ~~of the area~~ and the economic potential of the JCS area. ~~to make a partial return to household formation trends that existed before the recession.~~<br><br>*Through the examination of the plan, the Inspector has recommended that an additional 5% be added to the OAN to increase the provision of affordable housing and add flexibility. This brings the total housing requirement figure to 35,175.* | To update position on evidence for OAN and employment land and job growth.<br><br>To include 5% uplift to OAN for affordable housing and flexibility. |
| PMM011 | 3.1.7 | ~~The CCHPR has also examined alternative scenarios and further detail of this work is included in the JCS~~ | Updated position on OAN |

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| | | ~~evidence base. This work has highlighted the particular impact of the recession on the 25-34 year-old age group, as well as their ability to form households as the economy recovers; it is therefore considered that the most credible option for the JCS would be to focus on this age group's potential to form households and has been a principal factor in identifying the OAN for about 30,500 dwellings.~~ | calculation is presented in the explanatory text. |
| PMM012 | 3.1.7 | *The requirements set out in Policy SP1 reflect the evidence and take into account the following key issues:*<br>• *Population growth and changing household size*<br>• *The effect of, and prospects for, economic growth*<br>• *The dynamics of the local housing market*<br>• *Landscape and environmental constraints*<br>• *Infrastructure capacity and deliverability*<br>• *Role and function of the Green Belt*<br>• *The Duty to Co-operate across local authority boundaries.* | Paragraph moved from the explanation section of Policy SP1. |
| PMM013 | Policy SP1 – The Need for New Development | **Policy SP1: The Need for New Development**<br><br>1. During the plan period, provision will be made to meet the need for *approximately* ~~about~~ ~~30,500~~ *35,175* new homes and *a minimum of 192 hectares of B-class employment* land to support *approximately* ~~about 28,000~~ *39,500* new jobs.<br><br>2. This is to be delivered by development within existing urban areas through district plans, existing commitments, urban extensions to Cheltenham and Gloucester, and the provision of Strategic Allocations at Ashchurch. This strategy aims to locate jobs near to the economically active population, increasing sustainability, and reducing out-commuting thereby reducing carbon emissions from unsustainable car use.<br><br>3. This housing requirement for each local authority will be as follows:<br><br>• Gloucester ~~11,300~~ *at least 14,359* new homes<br>• Cheltenham ~~9,100~~ *at least 10,917* new homes<br>• Tewkesbury ~~10,100~~ *at least 9,899* new homes | (1) Housing and employment figures updated. Policy clarifies B class employment land requirement. Policy paragraphs split into two.<br><br>Re-numbered (3) Updated housing requirement for each district.<br><br>(previous 3 deleted) Policy point removed from SP1 and moved to the Delivery, Monitoring and Review section which provides greater detail on the |

## JCS Table of Main Modifications

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| | | ~~3. The appropriate level of new housing and employment will be monitored and a review undertaken five years following the adoption of the JCS and periodically thereafter, taking into account the most up-to-date evidence available at that time.~~<br><br>This policy contributes towards achieving Objectives 1, 2, 3, 6, 7 and 8. | review mechanism. |
| PMM014 | 3.1.8<br>3.1.9<br>3.1.10 | ~~There are inevitably significant uncertainties when planning for a 20-year period, but within the lifetime of the JCS it is expected that the economy will at least partially recover, that the mortgage lending situation will improve, and that the housing market will also improve from its current position. This would result in a return towards previous trends in household formation rates. If household formation rates for the 25–34-year-old age group were to make a partial recovery to previous trends, providing more opportunity for younger adults to form households, this would imply a requirement for about 30,500 additional homes.~~<br><br>~~Whilst the baseline demographic projections support the need for 28,500 dwellings, the JCS plans for a minimum of 30,500 new dwellings, in order to better meet the aspirations of younger adults to form households. This has been selected as an appropriate response to the available evidence, coupled with a commitment to monitoring and early review.~~<br><br>~~This level of development proposed is at an overall rate higher than that observed in the JCS area overall since 1991 and would represent an increase in housing supply in line with the aims of NPPF and the best available information of the likely levels of housing required by 2031. In order to provide a level of flexibility, land has been allocated in Policy SP2 to provide for a slightly higher number of dwellings, with additional safeguarded sites.~~<br><br>~~**Annual JCS Housing Delivery**~~ / ~~**Annual JCS Housing Requirement**~~<br>~~**1991-2001**~~ / ~~**2001-2011**~~ / ~~**2011-2031**~~<br>~~1326~~ / ~~1450~~ / ~~1525~~ | Text deleted and updated position on OAN presented in explanatory text.<br><br>Text updated and moved to delivery section of policy SP1 |
| PMM015 | 3.1.8 | *The assessment of the OAN for housing follows the approach indicated by the NPPF and the PPG and* | Explanatory text updated |

## JCS Table of Main Modifications

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td>3.1.9</td><td>takes as its starting point the latest official population forecasts and household projections. For the JCS this has meant using the Office for National Statistics (ONS) 2012 Sub-national Population Projections for England (May 2014) and the Department for Communities and Local Government (DCLG) 2012-based household projections (February 2015). However, the OAN assessment has also used the most recent evidence on how the population has changed. As such the assessment has been further adjusted to take into account the ONS 2014 Mid-Year Estimates (June 2015) and the latest ONS estimates for international migration statistics (August 2015). Using the latest available population and household formation data produced a demographically based estimate of the OAN for the JCS area of 31,830 homes over the plan period to 2031, as set out in Table SP1a below.<br><br>Table SP1a Demographic housing needs in the JCS area
<table>
<tr><th></th><th>Gloucester</th><th>Cheltenham</th><th>Tewkesbury</th><th>JCS</th></tr>
<tr><td>Demographic OAN 2011-31</td><td>13,290</td><td>9,900</td><td>8,640</td><td>31,830</td></tr>
</table>
<br>Whilst this provides an important starting point in calculating the OAN for housing it is also important to consider the impact of economic growth forecasts and aspirations. This will ensure that sufficient housing is made available to support the delivery of employment and job growth.</td><td>to set out latest evidence behind demographic-based OAN.</td></tr>
<tr><td>PMM016</td><td>3.1.11<br>3.1.12<br>3.1.13</td><td>With regard to employment, it is important that the JCS reflects the spirit of the NPPF in helping to ensure that the ‘planning system does everything it can to support sustainable economic growth’. Local employment need has been independently assessed by consultants NLP, to provide a robust analysis of employment potential in the area to ensure that JCS plans for a sufficient level of jobs and employment land to support growth aspirations. To do this assessment the latest economic forecasts have been used, utilising data from three independent forecasters: Cambridge Econometrics, Experian and Oxford Economics. These outputs have also been considered against local intelligence on forecast growth of specific sectors which included targeted consultation with the GFirst Local Enterprise Partnership and</td><td>Updated text to provide an overview of how the employment land and job aspirations were reached.</td></tr>
</table>

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
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| | | *local businesses. The assessment has also taken into account past trends and an analysis of supply and demand including loss of employment land to other uses. The evidence presented by NLP identifies that the JCS should establish a minimum requirement for B class employment land of 192 hectares to support positive business growth aspirations for a minimum additional 39,500 jobs.* ~~which identified the potential to create around 21,000-28,000 jobs to support a thriving economy. This assessment has been further informed by the emerging Strategic Economic Plan (SEP) of the Gloucestershire Local Enterprise Partnership (GFirst LEP). The baseline evidence provided by NLP indicates that between 34 and 60 hectares of employment land should be provided over the plan period, which would reflect recent economic growth forecasts for the JCS area.~~<br><br>~~The JCS has identified strategic employment sites to allow for this level of development, and has planned for the higher end of the range indicated, in order to provide sufficient flexibility for employment needs not anticipated by the evidence base e.g. unexpected changes in economic circumstances, and to help deliver the aspirations of the emerging SEP prepared by the Gloucestershire Local Enterprise Partnership. On this basis the JCS allocates about 64 hectares of additional employment land via new strategic sites, supported by protection and redevelopment of existing sites within urban areas, and enabling of new sites within these areas. This will be monitored over the plan period, along with the impact of higher economic activity rates, to consider any effects on the balance between housing provision and realising economic potential.~~<br><br>~~The requirements set out in Policy SP1 reflect the evidence and take into account the following key issues:~~<br><br>~~• Population growth and changing household size~~<br>~~• The effect of, and prospects for, economic growth~~<br>~~• The dynamics of the local housing market~~<br>~~• Landscape and environmental constraints~~<br>~~• Infrastructure capacity and deliverability~~ | Text moved to background section of policy SP1 |

<table>
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<tr><td></td><td></td><td>• ~~Role and function of the Green Belt~~<br>• ~~The Duty to Co-operate across local authority boundaries.~~</td><td></td></tr>
<tr><td>PMM017</td><td>3.1.11<br>3.1.12<br>3.1.13</td><td>In order to support aspirational economic growth the JCS has considered whether an economic uplift to the demographic OAN is required to support jobs. Having estimated the population needed in 2031 to provide the labour force implied by the three job forecasts, the number of homes needed to accommodate that population growth has been calculated using the household formation rates from DCLG's 2012-based household projections. The average of the three forecasts was taken which produced an economic 'policy-on' OAN of 33,500 dwellings.<br><br>Economic growth has been planned for at the JCS-wide level as a functioning economic area. The LEP strategy for economic growth, as set out in the Strategic Economic Plan, is focused on the M5 growth corridor running through the heart of the JCS area and not any particular authority. Therefore economic growth needs to be seen in the JCS area-wide context. This is a different approach from housing where each district has its own specifically assessed needs and requirements. Therefore, it is difficult to attribute the housing needs resulting from any additional policy-on economic uplift to specific areas. Nevertheless, the JCS has sought to distribute this uplift in dwellings in accordance with the amount of employment land potential in each authority area and with the spatial strategy set out at Policy SP2. This has resulted in the policy-on OAN for each area set out at Table SP1b.<br><br>Table SP1b 'Policy-On' economic uplift OAN
<table>
<tr><th></th><th>Gloucester</th><th>Cheltenham</th><th>Tewkesbury</th><th>JCS</th></tr>
<tr><td>Policy-on OAN 2011-31</td><td>13,675</td><td>10,395</td><td>9,425</td><td>33,500</td></tr>
</table>
<br>The employment forecasts for the JCS area are subject to considerable uncertainty and this is demonstrated in the way that they can change over a relatively short period of time. However, the JCS authorities believe that by establishing an OAN of 33,500 dwellings, this will ensure that economic</td><td>New text to provide an overview of how the OAN has taken into account the economic growth needs of the area.<br><br>Text to explain how the economic uplift to the OAN has been distributed</td></tr>
</table>

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>growth in the area is not constrained by the supply of housing.<br><br>Further to the economic uplift an additional 5% increase has been applied to the economic led OAN. This 5% has been added in order to boost the delivery of affordable housing as well as providing additional flexibility to the supply of land and boosting housing delivery in general. This further uplift has resulted in an overall housing requirement for the JCS area of 35,175 dwellings over the plan period. The resulting requirement for each area is set out at Table SP1c.<br><br>Table SP1c 'Policy-On' OAN with 5% Uplift
<table>
<tr><th></th><th>Gloucester</th><th>Cheltenham</th><th>Tewkesbury</th><th>JCS</th></tr>
<tr><td>Policy-on OAN + 5% Uplift 2011-31</td><td>14,359</td><td>10,917</td><td>9,899</td><td>35,175</td></tr>
</table></td><td>Text to explain the application of an addition 5% uplift to the OAN for affordable housing and flexibility..</td></tr>
<tr><td>PMM018</td><td>3.1.14<br>3.1.15<br>3.1.16</td><td>Delivery<br><br>The JCS plans for a significant level of housing and employment development to meet the needs of the area over the plan period. The level of housing development proposed is at an overall rate higher than that observed in the JCS area overall since 1991 and would represent an increase in housing supply in line with the aims of NPPF and the best available information of the likely levels of housing required by 2031.
<table>
<tr><th colspan="2">Annual JCS Housing Delivery</th><th>Annual JCS Housing Requirement</th></tr>
<tr><td>1991-2001</td><td>2001-2011</td><td>2011-2031</td></tr>
<tr><td>1326</td><td>1450</td><td>1759</td></tr>
</table>
Policy SP2 provides the spatial strategy how development will be distributed and delivered across the JCS</td><td>Text updated and moved from explanation section of policy SP1 9 (with deletion in relation to oversupply against the housing requirement). Further explanation provided in Policy SP2.<br><br>Summary explanation of the role of different sites and plans in meeting development needs.</td></tr>
</table>

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| | | *area. A key part of the delivery will be through the development of the Strategic Allocation sites that are identified through Policy SA1. These large sites will make a key contribution towards the housing and employment needs of the area. However, there is a significant role to play for the individual district capacities of each authority which will be delivered through non-strategic allocations in the district plans. This may also include Neighbourhood Plans which could identify local sites and policies for future neighbourhood level growth.*<br><br>~~**Delivery**~~<br><br>To assess the performance of the JCS*, including delivery against the OAN,* a separate monitoring framework is included in the plan, setting out the key indicators and contingencies that will be critical to the successful delivery of the plan strategy.<br><br>The *monitoring arrangements set out in the Delivery, Monitoring and Review section* ~~authorities' monitoring reports (AMRs)~~ will ~~have a role in~~ *enable the JCS authorities to* identify~~ing~~ *how* ~~where~~ policies *and sites* are ~~not~~ delivering against the plan objectives and strategy ~~as intended~~. The *monitoring* ~~AMRs~~ may also suggest courses of action to address *any* ~~these~~ issues. ~~In addition to annual monitoring, a five-yearly cycle of comprehensive monitoring and review of the JCS will be established. The review process would need to commence in advance of the review dates to enable any new or amended policies to be adopted in a timely manner.~~ *Further details are provided within the Delivery, Monitoring and Review section*.<br><br>~~The three councils will review the appropriate level of new housing and employment land and examine all available evidence sources, including demographic evidence, economic conditions and forecasts; if required, additional evidence reports will be commissioned. If evidence suggests that additional provision of housing or land for employment is required, the review will consider the appropriate response, including the possible need for additional allocations, the early release of any safeguarded sites and the need for assistance from other neighbouring authorities, as part of the Duty to Co-operate.~~ | Redrafted to indicate that monitoring arrangements are more comprehensive than just the AMR. Further details on monitoring and review is provided in Delivery, Monitoring and Review section. |
| PMM019 | 3.2.1 | Both the level and distribution of housing and employment is influenced by the vision of the JCS, and | Text to provide added |

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| | 3.2.2<br>3.2.3 | informed by sustainability principles and by the JCS Sustainability Appraisal process, which ~~must be~~ *has been* translated into an overarching strategy for the JCS area. Policy SP2 sets out this strategy and identifies the distribution of new development across the area. Additional policy on employment and the economy is provided by Policy SD2. The proposals plan 'JCS Key Diagram' shows the distribution at Appendix 2.<br><br>It has long been recognised that Gloucester and Cheltenham cannot wholly meet their development requirements within their administrative areas, and as such collaborative working across boundaries through the Duty to Co-operate is necessary. This was previously addressed through the Gloucestershire County Structure Plan and the draft Regional Spatial Strategy (RSS), which identified both Gloucester and Cheltenham as being amongst the region's strategically significant cities and towns. All the Gloucestershire local planning authorities are working together, within the context of the Duty to Co-operate, to ensure that new Development Plan Documents properly address strategic planning and cross-boundary issues. A wider memorandum of understanding is ~~currently being progressed~~ *maintained* between all Gloucestershire districts covering issues which require joint working. *In addition, the Gloucestershire authorities have entered into a devolution bid which sets out the commitment to work together to progress strategic plans in the event of the creation of a devolved authority*. ~~In particular, the Gloucestershire authorities have worked together on an update of the Strategic Housing Market Assessment (SHMA).~~<br><br>The JCS authorities have also specifically agreed with Stroud District Council to take a strategic approach in the review of their ~~respective~~ development plans, and to develop strategies which seek to meet objectively assessed development and infrastructure requirements in the review of their respective Development Plan Documents. *The JCS authorities will also continue to work with the South Worcestershire authorities, and Wychavon District Council in particular, in relation to future development needs.* Consideration will be given t*o* meeting unmet requirements from another local planning authority *with*in *and outside* the housing market area, where it is reasonable to do so and consistent with achieving sustainable development. | detail on the Gloucestershire devolution bid.<br><br>Explanatory text on the joint working with the South Worcestershire authorities. |
| PMM020 | Policy SP2: Distribution of | ~~**Policy SP2: Distribution of New Development**~~ | (2) (3) (4) Policy updated with latest housing needs |

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| | New Development | ~~1. To support their economic roles as the principal providers of jobs, services and housing, and in the interests of promoting sustainable transport, development will be focused at **Gloucester** and **Cheltenham**, including urban extensions to these areas.~~<br><br>~~2. Over the plan period to 2031, land will be provided for about 31,040 new homes and for about 64 hectares of employment land, to support about 28,000 new jobs.~~<br><br>~~• **Gloucester and its urban extensions will accommodate about 11,943 new homes**~~<br>~~• **Cheltenham and its urban extensions will accommodate about 10,720 new homes**~~<br>~~• **Elsewhere within Tewkesbury Borough development will accommodate about 8,377 new homes**~~<br><br>~~**3. This will be met:**~~<br>~~• Through strategic allocations at Ashchurch~~<br>~~• Through smaller scale development meeting local needs at Tewkesbury town in accordance with its role as a market town, and at rural service centres and service villages.~~<br><br>~~4. Whilst planning to meet the development needs of Gloucester and Cheltenham in and adjoining the two urban areas through the proposed urban extensions, no wider provision will be made elsewhere within Tewkesbury Borough to meet these unmet needs.~~<br><br>~~5. **Rural service centres** and **service villages** as identified in Table SP2c below will accommodate lower levels of development to be allocated through the Tewkesbury Borough Plan and Neighbourhood Plans, proportional to their size and function, and also reflecting their proximity and accessibility to Cheltenham and Gloucester and taking into account the environmental, economic and social impacts. Over the plan period to 2031:~~ | figures for each authority area. Policy includes an update on the sources of supply that are allocated and identified through the JCS, including Strategic Allocations, district capacity, existing commitments, and other sites covered by MoAs. This provides clarity on the distribution of housing planned through the JCS area.<br><br>(6) Addition to clarify that reference to SD11 relates to residential development only.<br><br>(7) Policy point to provide further clarification. Policy seeks for the unmet needs to be addressed through the plan making process through identified Strategic Allocations.<br><br>(8) Additional policy point to address the role of plan review in identifying any |

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| | | ~~• The rural service centres will accommodate 1860 new homes, and~~<br>~~• The service villages will accommodate 752 new homes~~<br><br>~~6. In the **remainder of the rural area, Policy SD11** will apply.~~<br><br>~~(The amount of development and its distribution is set out in Tables SP2a and SP2b [*at the end of this section of the plan*], and indicated on the JCS Key Diagram at Appendix 2.)~~<br><br>~~**This policy contributes towards achieving Objectives 1, 2, 3, 4, 5, 6, 7, 8 and 9.**~~<br><br>***Policy SP2: Distribution of New Development***<br><br>*1. To support their economic roles as the principal providers of jobs, services and housing, and in the interests of promoting sustainable transport, development will be focused at Gloucester and Cheltenham, including urban extensions to these areas.*<br><br>*2. To meet the needs of Gloucester City the JCS will make provision for at least 14,359 new homes. At least 13,047 will be provided within the Gloucester City administrative boundary, including the Winnycroft Strategic Allocation, and urban extensions at Innsworth and Twigworth, South Churchdown and North Brockworth within Tewkesbury Borough defined in Policy SA1, and sites covered by any Memoranda of Agreement.*<br><br>*3. To meet the needs of Cheltenham Borough the JCS will make provision for at least 10,996 new homes. This will be provided within the Cheltenham Borough administrative boundary and cross-boundary urban extensions at North West Cheltenham and West Cheltenham (both of which are partly within Tewkesbury Borough) defined in Policy SA1, and commitments covered by any Memoranda of Agreement.*<br><br>*4. To meet the needs of Tewkesbury Borough, outside of the urban extensions to Gloucester and* | further Strategic Allocations.<br><br>(9) To provide latest requirement of employment land. |

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
|---|---|---|---|
| | | *Cheltenham, the JCS will make provisions for at least 9,899 new homes. At least 7,057 dwellings will be provided through existing commitments, development at Tewkesbury Town in line with its role as a market town, smaller-scale development meeting local needs at Rural Service Centre and Service Villages, and sites covered by any Memoranda of Agreement.*<br><br>*5. Rural service centres and service villages as identified in Table SP2c below will accommodate lower levels of development to be allocated through the Tewkesbury Borough Plan and Neighbourhood Plans, proportional to their size and function, and also reflecting their proximity and accessibility to Cheltenham and Gloucester and taking into account the environmental, economic and social impacts. Over the plan period to 2031:*<br><br>• *The rural service centres will accommodate 1860 new homes, and*<br>• *The service villages will accommodate 880 new homes*<br><br>*6. In the remainder of the rural area, Policy SD11 will apply to proposals for residential development.*<br><br>*7. The unmet needs of Gloucester and Cheltenham, beyond their administrative boundaries, will only be delivered on Strategic Allocation sites allocated through Policy SA1 and any other sites with an agreed sharing mechanism through a Memorandum of Agreement between the relevant local planning authorities.*<br><br>*8. The identification of any additional urban extensions to help meet the unmet needs of a local planning authority must be undertaken through a review of the plan. Any additional site allocations made through a local plan must be in conformity with the JCS spatial strategy. Consideration will also be given to meeting needs in another local authority area where it is clearly established that they cannot be met within the JCS area, or provide a more sustainable and appropriate option.*<br><br>*9. To support economic growth in the JCS area, the JCS will make provision for at least 192 hectares of B-class employment land. At least 84 hectares of B class employment land will be delivered on strategic Allocation sites as detailed at Policy SA1. Any further capacity will be identified in District* | |

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
|---|---|---|---|
| | | *Plans.*<br><br>*(The amount of development and its distribution is set out in Tables SP2a and SP2b [at the end of this section of the plan], and indicated on the JCS Key Diagram at Appendix 2)*<br><br>***This policy contributes towards achieving Objectives 1, 2, 3, 4, 5, 6, 7, 8 and 9.*** | |
| PMM021 | 3.2.5<br>3.2.6<br>3.2.7<br>3.2.8<br>3.2.9 | **Explanation**<br>The guiding principle of Policy SP2 is that need is met where it arises, so that Gloucester and Cheltenham, together with their immediate wider areas, remain the primary focus for growth. This reflects the urban-focused economic vision and support for urban regeneration for the JCS area.<br><br>In order to assess how much land is available to meet the JCS area's needs, the authorities have reviewed all potential sources of housing land supply. The potential land supply between 2011 and 2031 comes from a number of sources. Firstly, houses that have been built between 2011 and 2016~~4~~ count towards meeting needs in the early part of the plan; secondly, sites which have already been granted planning permission*, including those that* ~~and~~ are being built out; thirdly, allocated sites in existing adopted development plans. In addition, we have been informed by the ~~Strategic Housing Land Availability Assessment (SHLAA)~~ *Strategic Assessment of Land Availability (SALA)* process, although this does not consider all constraints which could prevent sites coming forward.<br><br>~~We have made~~ *An* assumption~~s~~ *has been made* as to how many windfall sites (sites which are not allocated in development plans but come forward through planning applications) will be granted permission across the plan period in each district, reflecting the most recent guidance included in national PPG.<br><br>There are also further sites to be identified through the district plans. Work on the Gloucester *City Plan, Cheltenham Borough Plan and Tewkesbury Borough Plan are advancing alongside the JCS and will bring forward allocations to deliver each area's identified district capacity.* ~~plan is already well advanced,~~ | Amended to use latest terminology of Strategic Assessment of Land Availability.<br><br>Updated wording regarding the district plans.<br><br>Figures for district capacity and strategic allocation supply updated with latest trajectory information.<br><br>Text removed relating to uncertainty of district level plans as there is greater certainty due to further development of these plans. |

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
|---|---|---|---|
| | | ~~Cheltenham and Tewkesbury Borough's district level plans are less far forward in the plan preparation process and there is some uncertainty as to how many homes will eventually be allocated and when they will be delivered.~~ In total, these sources of land supply are thought to be able to provide for ~~just over~~ *approximately 56%*~~62%~~ of the *housing to be delivered in the JCS* ~~identified need~~ (*19,700* ~~18,856~~ homes), predominantly within the urban areas. The urban capacity figures that are being set out in this document are an estimate based on the best information available at this time. ~~There is also uncertainty about the choices councils will wish to make when the District plans are progressed to a more advanced stage.~~ Therefore it is essential that enough land is allocated on sites of strategic scale to provide flexibility ~~if or when this occurs,~~ ensuring that the overall requirements for the JCS area as a whole are met and the plan is sound.<br><br>Recognising that there is insufficient land inside the existing urban boundaries of Gloucester and Cheltenham, together with commitments within Tewkesbury town, to accommodate their housing and employment needs, there was a need to find *additional* land ~~for at least 38% of~~ *to meet* the JCS needs ~~(11,644 homes)~~. Hence, urban extensions to Gloucester and Cheltenham have been identified~~, together with Strategic Allocations at Ashchurch (including a major brownfield site), to~~ *which would* accommodate ~~the remaining~~ *approximately 35%* of *the housing supply identified in the JCS*~~growth~~. As concluded by the ~~SA~~ *Sustainability Appraisal*, urban extensions are considered to be the most sustainable locations for new development (following existing urban areas) as they can share transport, social and service infrastructure with existing urban areas and are located close to essential services. Further information on the approach to the distribution of development is set out in the 'Spatial Options' topic paper (October 2013), available along with the other evidence base documents mentioned in this chapter on the JCS website at www.gct-jcs.org/EvidenceBase/ | |
| PMM022 | 3.2.10<br>3.2.11 | ~~The next step was to consider the potential for urban extensions and Strategic Allocations across the JCS area. This selection process began with a comprehensive assessment of land surrounding the three main centres. In order to identify and assess the options for development on the edge of urban areas, a study was undertaken - the 'Broad Locations Report' (October 2011). This helped to identify the broad locations which offered the best scope for additional development. This work was further refined through the Strategic Allocations Report (October 2013) which considers the potential for strategic development within and around the periphery of all three centres. These reports draw together the~~ | Explanatory text on site selection process and spatial strategy removed and abbreviated through new and update text. This is to increase readability of the document. |

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
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| | | ~~relevant evidence base produced so far on site-specific issues including flooding, biodiversity, Green Belt, landscape and other constraints. One of the principal environmental constraints across the area is the risk of flooding, and significant work assessing flood risk has been undertaken through the Strategic Flood Risk Assessment level 1 and 2 studies available on the JCS website This is of paramount importance and development potential can only be identified in locations prone to flooding following a sequential test, and where appropriate an exceptions text, which sets out that there are no other preferable locations.~~<br><br>~~Following the consultation on the draft JCS between October and December 2013, the JCS councils have reviewed both the level of development required and the suitability of the Strategic Allocations. This has resulted in minor changes to site capacities.~~<br><br>*The locations for the urban extensions and Strategic Allocations have been derived through a selection process involving a comprehensive assessment of land surrounding the three main centres of Gloucester, Cheltenham and Tewkesbury. Critically, this process has been informed by detailed evidence base on site-specific issues including flooding, biodiversity, Green Belt, landscape and visual sensitivity, transport and infrastructure as well as being subject to assessment through the Sustainability Appraisal. The development of the site selection process is detailed through the Broad Locations Report (October 2011) and the Strategic Allocations Report (2013).*<br><br>*It is anticipated that development on the urban extensions and strategic allocation will be started within the early part of the plan period in order to ensure an on-going supply of housing and employment development to 2031, recognising that there are some outstanding issues which need to be resolved on some sites. These sites will be supported by sustainable transport links and a range of other higher order services and facilities, such as community centres, schools and medical centres etc. Further information is set out in Policy SA1 and the infrastructure policies of the JCS.*<br><br>*Beyond Gloucester, Cheltenham and the Strategic Allocations, further development will be accommodated within Tewkesbury Borough. Tewkesbury Town, in accordance with its role as a market town, will deliver smaller-scale development. For the wider rural area, the starting point for the* | |

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
|---|---|---|---|
| | | *distribution of development was drawn from the evidence set out within the Rural Area Settlement Audit, updated in 2015, available to view on the JCS website. There are two settlements, Bishop's Cleeve and Winchcombe, which offer a higher range of services and facilities within the rural areas; these are defined as rural service centres.*<br><br>*In addition, there are a number of freestanding villages within Tewkesbury Borough which are considered to be suitable locations for some limited residential development. These villages were assessed as having two or more primary services, two or more secondary services and benefiting from bus services and/or road access to a major employment area by the 2015 Rural Area Settlement Audit Refresh and updated by further evidence as available. These settlements are defined as service villages. The retention of services is intrinsically linked to the size and distribution of the resident population and it is important that these services remain viable. About 2,740 homes will be accommodated across the rural area over the plan period to 2031; this development will be concentrated on the rural service centres and service villages. More development will be accommodated at the rural service centres than at the service villages. Approximately two-thirds of the development has already been delivered or committed, but the remainder will be allocated through the Tewkesbury Borough Plan and neighbourhood plans.* | |
| PMM023 | 3.2.12<br>3.2.13<br>3.2.14 | ~~The total number of dwellings that could be provided is about 31,040; this is slightly higher than the OAN of 30,500 which is considered acceptable as this allows some flexibility, reflecting guidance set out in NPPF. In addition, the strategic allocation site at Ashchurch is a large site and it is anticipated that not all the site may be delivered within the plan period to 2031. It is estimated that a further 600 dwellings will be delivered post-2031 and form part of the overall supply. This will be reviewed and, should circumstances change, will be brought forward before 2031.~~ *The total number of dwellings that is being provided for within the JCS area is approximately 31,100, which includes a contribution from Wychavon. This is lower than the overall housing requirement (including economic and 5% uplift) of 35,175. This shortfall occurs in meeting the needs of both Gloucester City and Tewkesbury Borough.*<br><br>*In meeting the needs of Gloucester it has been necessary to allocate sites on the edge of the urban area in Tewkesbury Borough. However, due to significant constraints and availability of land it has not been possible to allocate sites in the JCS to meet all of Gloucester's need over the plan period. Nevertheless, Gloucester has a good supply of housing land for the short to medium term that will enable it to meet its* | Update on the latest housing requirement and explanation that the JCS identifies development that is lower than this requirement.<br><br>Text provided to explain the situation regarding the housing supply at Gloucester and how any shortfall at the end of the plan period would be addressed. |

## JCS Table of Main Modifications

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
|---|---|---|---|
| | | *requirements to at least 2028/29. This will allow adequate time for an early review of the plan to explore further the potential for additional sites to meet Gloucester's needs in the longer term towards the end of the plan period. This would also allow the consideration of additional development options that may become available, both within and outside the JCS area. This could include the unlocking of further development opportunities within the urban area, as well as potential new urban extensions in Tewkesbury Borough and Stroud District. The JCS authorities have a Memorandum of Understanding in place with Stroud District in this regard.*<br><br>*At Tewkesbury town there are similar issues with allocating strategic sites that are within the JCS area when taking into account the significant constraints and availability of land around the urban area. This issue has been exacerbated by the decision by the Defence Infrastructure Organisation regarding the delayed release of the MoD Ashchurch site. As a result Tewkesbury Borough has an identified shortfall against the total JCS requirement of approximately 2,800 dwellings. Nevertheless, there are opportunities for development at the MoD Ashchurch site within the plan period if infrastructure constraints can be overcome to release available parts of the site. Similarly there is potential for development at a site at Fiddington once the highway infrastructure needs around the A46 and M5 Junction 9 are established. While these sites cannot be allocated now due to uncertainties over their deliverability and capacity,, a commitment has been set out in the Delivery, Monitoring & Review section to undertaking an immediate review of Tewkesbury's housing supply so that further work on the development potential around the Tewkesbury town and Ashchurch area can be carried out.. Further information is also provided in the JCS Housing Implementation Strategy. In addition, there is joint working with Wychavon District Council to look to bring forward the cross-boundary site at Mitton, adjacent to town. The adopted South Worcestershire Development Plan (2006-2030) already includes a policy commitment to consider, including through a review of the plan, meeting the needs of other authorities within the SWDP area. The site at Mitton is specifically referenced in this context. In addition, the JCS authorities and Wychavon District Council have a Memorandum of Agreement in place which sets out the direction of travel for the delivery of this site and meeting the needs of Tewkesbury.*<br><br>*As noted above there is currently a significant shortfall identified for Tewkesbury. However, Tewkesbury has an oversupply against its annual requirement from 2011 to 2016 and has a good supply of housing* | Text provided to explain the situation regard the housing supply at Tewkesbury and how any shortfall at the end of the plan period would be addressed.<br><br>Reference to the Housing Implementation Strategy that will support the plan. |

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
|---|---|---|---|
| | | *land that will enable it to meet its requirements over the short to medium term. An immediate review of the JCS would allow for the remaining shortfall to be addressed by exploring additional sites both within and outside the JCS area, including the potential for additional working with Wychavon District Council. Further information is provided within the Delivery, Monitoring & Review section of this plan.*<br><br>~~The four urban extensions proposed to help meet the needs of Gloucester are all located within Tewkesbury Borough. The two urban extensions proposed to help meet the needs of Cheltenham fall across the administrative areas of Cheltenham and Tewkesbury.~~<br><br>The three authorities have prepared a detailed housing trajectory setting out when development is likely to take place. This work also includes an assessment of the five-year housing land supply position; details of this assessment are set out in the *Housing Implementation Strategy* ~~Housing Background Paper~~, available on the JCS website. | |
| PMM024 | 3.2.15<br>3.2.16<br>3.2.17<br>3.2.18<br>3.2.19<br>3.2.20 | ~~It is anticipated that the majority of development on the urban extensions and strategic allocation will be started within the first part of the plan period in order to ensure an on-going supply of housing and employment development to 2031, recognising that there are some outstanding issues which need to be resolved on some sites. These sites will be supported by sustainable transport links and a range of other higher order services and facilities, such as community centres, schools and medical centres etc. Further information is set out in Policy SA1 and the infrastructure policies of the JCS.~~<br><br>~~The JCS area is constrained by Green Belt land, areas at risk of flooding and The Cotswolds AONB, which is the highest national landscape designation within the JCS area. It is considered that land within the AONB is not an appropriate location for urban extensions and it has therefore been excluded from this site selection process. Green Belts are not a landscape designation and do not share the same characteristics as AONB designations. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open.~~<br><br>~~An assessment of the Green Belt boundary was undertaken to identify areas which could accommodate development needs without undermining the purpose of the Green Belt. The assessment suggested redrawing the Green Belt boundary to ensure that it would continue to deliver its primary function of~~ | Explanatory text on the spatial strategy deleted and updated and abbreviated text has replaced it. This is to increase readability of the document. |

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
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| | | ~~preventing Gloucester and Cheltenham as well as Cheltenham and Bishop's Cleeve from coalescing. The JCS Green Belt assessment (November 2011) is available on the JCS website.~~<br><br>~~The Green Belt boundary has been amended, as shown on the Green Belt map (see Appendix 3); further detail on Green Belt policy is set out in Policy SD6.~~<br><br>~~Beyond Gloucester and Cheltenham, smaller scale development will be accommodated at Tewkesbury town in accordance with its role as a market town. The starting point for the distribution of development in the rural areas was drawn from the evidence set out within the Rural Area Settlement Audit, updated in 2013, available to view on the JCS website. There are two settlements, Bishop's Cleeve and Winchcombe, which offer a higher range of services and facilities within the rural areas; these are defined as rural service centres.~~<br><br>~~In addition, there are a number of freestanding villages within Tewkesbury Borough which are considered to be suitable locations for some limited residential development. These villages were assessed as having two or more primary services, two or more secondary services and benefiting from bus services and/or road access to a major employment area by the 2013 Rural Area Settlement Audit and updated by further evidence as available. These settlements are defined as service villages. The retention of services is intrinsically linked to the size and distribution of the resident population and it is important that these services remain viable. About 2,612 homes will be accommodated across the rural area over the plan period to 2031; this development will be concentrated on the rural service centres and service villages. More development will be accommodated at the rural service centres than at the service villages. Approximately two-thirds of the development has already been delivered or committed, but the remainder will be allocated through the Tewkesbury Borough Plan and neighbourhood plans.~~ | |
| PMM025 | 3.2.20 | *In regard to employment land the JCS sets the framework for the delivery of a minimum of 192 hectares of B-class employment need. The sources of supply includes a mix of high quality and well-located large strategic sites, existing undeveloped available employment sites, and potential additional smaller sites in the urban and rural areas. The Strategic Allocations are expected to deliver at least 84ha of B-class employment land. Through the district plans each authority will explore the potential to allocate further local employment sites. This will provide choice and flexibility to support delivery of B-class employment* | Updated explanation provided on the issue of employment land supply, including the role of Strategic Allocations and additional sites to be |

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| | | *growth. Monitoring of the plan would establish the growth of employment throughout the plan period, including any windfall development, and seek to rectify any shortfall through plan review. This will include through further exploration of growth opportunities at the MoD Ashchurch site and the wider M5 Junction 9 area.*<br><br>*The JCS Economic Update Note (February 2016) assessed the potential employment land supply for each of the districts. This used information provided through the Strategic Assessment of Land Availability to present a broad indicator of potential capacity based on the availability, suitability and deliverability of the sites. It also explored existing undeveloped commitments and existing allocations. This Update Note provided an indicative availability of B-class land of approximately 7ha at Gloucester City, 1ha in Cheltenham Borough and 40ha in Tewkesbury Borough. Further investigation into employment allocations and capacity will be undertaken through the district plans.* | identified through the district plans.<br><br>Explanation of the potential capacity for new employment sites to be explored through the district plans. |
| PMM026 | 3.2.20 | ***Apportionment of Urban Extensions***<br><br>*All three authorities have worked together to find sustainable sites to meet the development needs of the area, transcending their administrative boundaries. As such, the three urban extensions proposed (excluding Winnycroft) to meet the needs of Gloucester are located entirely within Tewkesbury Borough. The two urban extensions proposed to meet the needs of Cheltenham fall across the administrative areas of both Cheltenham and Tewkesbury Borough.*<br><br>*Under the Duty to Cooperate it is recognised that, regardless of the fact that the majority of the land is within Tewkesbury Borough, the urban extensions are proposed identified to meet the unmet needs of Gloucester or Cheltenham. Therefore dwellings being delivered on urban extensions to Gloucester or Cheltenham will contribute solely to the needs of the area's respective OANs and land supply calculations.* | Explanatory text provided to confirm the apportionment approach being taken on the Strategic Allocation sites. |
| PMM027 | 3.2.21<br>3.2.22 | **Delivery**<br><br>To assess the performance of the JCS, a separate monitoring framework is included in the plan, setting out the key indicators and contingencies that will be critical to the successful delivery of the plan | Delivery section updated to point towards the more detailed Delivery, Monitoring and Review |

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>strategy. This is set out within the Delivery, Monitoring and Review section.<br><br>The Housing Implementation Strategy provides the detailed trajectory information for the JCS. The trajectory is also included as part of the Delivery, Monitoring and Review section.<br><br>The ~~AMRs~~ JCS monitoring will ~~have a role in~~ identify~~ing~~ where Strategic Allocations, proposals or policies are ~~not~~ delivering against the plan objectives and strategy ~~as intended~~. ~~The AMRs may also suggest courses of action to address these issues. In addition to annual monitoring, a five yearly cycle of comprehensive monitoring and review of the JCS will be established. The review process would need to commence in advance of the review dates to enable any new or amended policies to be adopted in a timely manner.~~</td><td>section of the plan.</td></tr>
<tr><td>PMM028</td><td>Table SP2a: Distribution of Development in the JCS area</td><td><s>Table SP2a: Distribution of development in the JCS area</s><br><br>
<table>
<tr><th><s>Distribution of Development</s></th><th><s>Net additional dwellings to 2031</s></th><th><s>Ha. of employment land to 2031</s></th></tr>
<tr><td colspan="3"><s>Gloucester</s></td></tr>
<tr><td colspan="3"><s>Total requirement for Gloucester City Council is 11,300 until 2031</s></td></tr>
<tr><td><s>District capacity*</s></td><td><s>7,793</s></td><td><s>To be determined through the Gloucester City Plan</s></td></tr>
<tr><td><s>Unmet need (to be met by urban extensions to Gloucester and Cheltenham – see Table SP2b)</s></td><td><s>3,507</s></td><td></td></tr>
<tr><td><s>Total</s></td><td><s>11,300</s></td><td><s>26.5 ha</s></td></tr>
<tr><td colspan="3"><s>Cheltenham</s></td></tr>
<tr><td colspan="3"><s>Total requirement for Cheltenham Borough Council is 9,100 until 2031</s></td></tr>
</table></td><td>Table SP2a updated with latest trajectory information and reformatted to make simpler and more readable.</td></tr>
</table>

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
|---|---|---|---|
| | | ~~District capacity* (includes homes proposed via urban extensions A5 and A6 for the area of land falling within the administrative boundary of Cheltenham Borough)~~ ~~7,375~~ ~~To be determined through the Cheltenham Plan~~<br>~~Unmet need (to be met by urban extensions to Gloucester and Cheltenham – see Table SP2b)~~ ~~1,725~~<br>~~**Total**~~ ~~9,100~~ ~~23.4 ha~~<br>~~**Tewkesbury**~~<br>~~**Total requirement for Tewkesbury Borough Council is 10,100 until 2031**~~<br>~~District capacity*~~ ~~10,640~~ ~~To be determined through the Tewkesbury Borough Plan~~<br>~~Unmet need~~ ~~0~~<br>~~Total~~ ~~10,640~~ ~~34.3 ha~~<br>~~**TOTAL HOUSING SUPPLY ACROSS THE JCS AREA**~~ ~~**31,040**~~ ~~**64.2 (plus 20 replacement of existing use at A8 site strategic allocation)**~~<br><br>~~* District capacity is made up of past delivery (from 2011), commitments, windfalls and potential District Plan allocations on smaller sites. For Cheltenham, the district capacity includes homes proposed via urban extensions A5 and A6 for the area of land falling within the administrative boundary of Cheltenham Borough, the breakdown of which is set out in Table SP2b.~~ | |

## JCS Table of Main Modifications

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
|---|---|---|---|
| | | ***Table SP2a: Sources of housing supply in the JCS area*** | |

| | ***Housing Supply*** |
|---|---|
| ***Gloucester City*** | |
| *Completions* | *2,526* |
| *Commitments* | *2,237* |
| *Windfall Allowance* | *832* |
| *Gloucester City Plan (Further Potential)* | *1,937* |
| *Strategic Allocations (Gloucester City)* | *620* |
| *Urban Extensions (Tewkesbury Borough)* | *4,895* |
| ***Supply Total*** | ***13,047*** |
| | |
| ***Cheltenham Borough*** | |
| *Completions* | *1,426* |
| *Commitments* | *2,353* |
| *Existing Local Plan Allocations* | *10* |
| *Windfall Allowance* | *865* |
| *Cheltenham Borough Plan (Further Potential)* | *957* |
| *Urban Extensions (Cheltenham Borough)* | *2,775* |
| *Urban Extensions (Tewkesbury Borough)* | *2,610* |
| ***Supply Total*** | ***10,996*** |
| | |
| ***Tewkesbury Borough*** | |
| *Completions* | *2,496* |
| *Deliverable Commitments* | *3,148* |
| *Existing Local Plan Allocations* | *0* |
| *Windfall Allowance* | *598* |
| *Tewkesbury Borough Plan (Further Potential)* | *315* |
| *Mitton (Wychavon District)* | *500* |
| ***Supply Total*** | ***7,057*** |

## JCS Table of Main Modifications

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td>PMM029</td><td>Table SP2b Geographical location of strategic allocation sites</td><td>~~**Table SP2b Geographical location of strategic allocation sites**~~
<table>
<tr><th>~~**Strategic Allocations**~~</th><th>~~**Gloucester City Council**~~</th><th>~~**Cheltenham Borough Council**~~</th><th>~~**Tewkesbury Borough Council**~~</th><th>~~**TOTAL NUMBER OF PROPOSED DWELLINGS**~~</th></tr>
<tr><td>~~A1 Innsworth~~</td><td>~~N/A~~</td><td>~~N/A~~</td><td>~~1,250~~</td><td>~~1,250~~</td></tr>
<tr><td>~~A2 North Churchdown~~</td><td>~~N/A~~</td><td>~~N/A~~</td><td>~~532~~</td><td>~~532~~</td></tr>
<tr><td>~~A3 South Churchdown~~</td><td>~~N/A~~</td><td>~~N/A~~</td><td>~~868~~</td><td>~~868~~</td></tr>
<tr><td>~~A4 North Brockworth~~</td><td>~~N/A~~</td><td>~~N/A~~</td><td>~~1,500~~</td><td>~~1,500~~</td></tr>
<tr><td>~~A5 North West Cheltenham~~</td><td>~~N/A~~</td><td>~~1800~~</td><td>~~2,985~~</td><td>~~4,785~~</td></tr>
<tr><td>~~A6 South Cheltenham/ Leckhampton~~</td><td>~~N/A~~</td><td>~~764~~</td><td>~~360~~</td><td>~~1,124~~</td></tr>
<tr><td>~~A8 MoD site at Ashchurch*~~</td><td>~~N/A~~</td><td>~~N/A~~</td><td>~~2,125~~</td><td>~~2,125~~</td></tr>
<tr><td>~~**TOTAL**~~</td><td>~~**0**~~</td><td>~~**2,564**~~</td><td>~~**9,620**~~</td><td>~~**12,184**~~</td></tr>
</table>
~~The urban extensions to help meet the needs of Gloucester are all located within Tewkesbury Borough.~~</td><td>Table SP2b updated and simplified to provide latest information on Strategic Allocation delivery.</td></tr>
</table>

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|---|---|---|---|
| | | ~~The two urban extensions to help meet the needs of Cheltenham fall across the administrative areas of Cheltenham and Tewkesbury Boroughs. Further detail on how the urban extensions will be shared out is set out in the Housing Background Paper.~~<br>~~* This site is allocated to accommodate higher numbers than shown (details are set out in Policy A8). The additional homes are currently expected to be delivered post 2031.~~<br><br>***Table SP2b Apportionment of Strategic Allocation Sites*** | |

| *SUB AREA* | *AREA* | *Authority Area* | *Housing Supply* |
|---|---|---|---|
| *Gloucester City Supply* | *Gloucester City Urban Capacity* | *GCC* | *7,532* |
| | *Winnycroft Urban Extension* | *GCC* | *620* |
| | *Innsworth & Twigworth Urban Extension* | *TBC* | *2,295* |
| | *South Churchdown Urban Extension* | *TBC* | *1,100* |
| | *North Brockworth Urban Extension* | *TBC* | *1,500* |
| *Wider Cheltenham Area (WCA) Supply* | *Cheltenham District Capacity* | *CBC* | *5,611* |
| | *North West Cheltenham Urban Extension* | *CBC/TBC* | *4,285* |
| | *West of Cheltenham Urban Extension* | *CBC/TBC* | *1,100* |
| *Tewkesbury Borough Area* | *Tewkesbury Borough District Capacity* | *TBC* | *6,557* |

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>Supply</td><td>Mitton</td><td>WDC</td><td>500</td></tr>
<tr><td>Total JCS Area</td><td></td><td></td><td>31,100</td></tr>
</table>
</td><td></td></tr>
<tr><td>PMM030</td><td>Table SP2c: Settlement hierarchy</td><td>
Table SP2c: Settlement hierarchy
<table>
<tr><th>Settlement tier</th><th>Settlements</th></tr>
<tr><td>Key Urban Areas</td><td>Cheltenham<br>Gloucester</td></tr>
<tr><td>Market town</td><td>Tewkesbury</td></tr>
<tr><td>Rural service centres</td><td>Bishop’s Cleeve<br>Winchcombe</td></tr>
<tr><td>Service villages *</td><td>Alderton<br>Coombe Hill<br>Gotherington<br>Highnam<br>Maisemore<br>Minsterworth</td></tr>
</table>
</td><td>Settlement hierarchy updated to remove Twigworth (due to the strategic allocation) and add Stoke Orchard (following the 2015 Settlement Audit Refresh)</td></tr>
</table>

## JCS Table of Main Modifications

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
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| | | Norton<br>Shurdington<br>*Stoke Orchard*<br>Toddington (inc. New Town)<br>~~Twigworth~~<br>Twyning<br>Woodmancote<br><br>* The service village classification was informed by the 201*5*~~3~~ Settlement Audit *Refresh*. The JCS Settlement Audit will be reviewed to support the preparation of the Tewkesbury Borough Plan. The outcomes of the review will be used to ensure that the services villages identified by the JCS are still appropriate when it is submitted for examination. The distribution of development across the service villages will be guided by the Tewkesbury Borough Plan and neighbourhood plans. | |
| PMM031 | SD1 | ~~**SD1 – PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT**~~<br><br>~~**Background**~~<br><br>~~The NPPF recognises that sustainable development is about change for the better. It is about positive growth, and making economic, environmental and social progress for this and future generations. To achieve sustainable development, economic, social and environmental gains should be sought jointly~~ | National Policy and Guidance has now replaced the need for this policy |

## JCS Table of Main Modifications

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
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| | | ~~Policy SD1: Presumption in Favour of Sustainable Development~~<br><br>~~1. Unless either of the parameters under (3) below apply, through their development plans the Joint Core Strategy Authorities will seek positively to meet the objectively assessed development needs of the area incorporating sufficient flexibility to adapt rapidly to change.~~<br><br>~~2. Planning applications that accord with this Joint Core Strategy (and with subsequent district plans or neighbourhood plans) will be approved, unless material considerations indicate otherwise.~~<br><br>~~3. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision, the council will grant permission unless material considerations indicate otherwise, and unless:~~<br><br>~~i. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole, or~~<br><br>~~ii. Specific policies in that framework indicate that development should be restricted.~~<br><br>~~**This policy contributes towards achieving all of the JCS Strategic Objectives.**~~<br><br>.<br><br>~~**Explanation**~~<br><br>~~4.1.2 In line with Government policy advice, the JCS authorities have adopted a positive approach in seeking to meet the objectively assessed development needs of the JCS area. The policies in the JCS provide a clear framework to guide development that creates positive, sustainable growth,~~ | |

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| | | ~~therefore following the presumption in favour of sustainable development, enabling proposals that accord with the JCS Strategic Objectives to be approved without delay. This policy is therefore at the heart of decision-taking when assessing planning applications.~~<br><br>~~4.1.3 In future years, policies may become out of date. To enable the council to continue to take a sustainably positive approach to decision-making, applicants for planning permission will need to assist by submitting evidence to demonstrate how the benefits of the proposal outweigh any adverse impacts. In this way economic, social and environmental responsibilities can continue to be met without compromising the ability of future generations to meet their own needs and well-being.~~<br>~~**Delivery**~~<br>~~4.1.4 Delivery of this policy will be furthered by development management and enforcement procedures to ensure that the presumption in favour of sustainable development is applied wherever applicable.~~ | |
| PMM032 | SD2<br><br>4.2.1 | **Background**<br><br>~~National policy identifies a clear role for the planning system to support sustainable economic growth. In particular, Development Plan Documents should be proactive in meeting the development needs of business. The three councils are now working with adjoining authorities and local businesses through the Gloucestershire Local Enterprise Partnership (GFirst LEP) to develop and deliver a Growth Plan for Gloucestershire as a whole.~~<br><br>*A core planning principle of the NPPF and one of the starting points for the spatial strategy of the JCS is the delivery of sustainable economic development. To reflect this planning principle and to also support the implementation of the Strategic Economic Plan for Gloucestershire (SEP), the JCS has established a* | Re-written for clarification |

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| | | *vision to provide the context for economic growth;*<br>*"The Joint Core Strategy Area will be recognised nationally as enjoying a vibrant competitive economy with increased job opportunities and a strong reputation for being an attractive place to live and invest".*<br>*This vision is underpinned by three specific strategic objectives to support a thriving economy through* ***building a strong and competitive urban economy, ensuring the vitality of town centres and*** *s****upporting a prosperous rural economy.*** | |
| PMM033 | SD2<br>4.2.2 | In the NPPF, employment is considered in a wider sense than the traditional industrial, office and warehousing (B1, B2 and B8 uses). For example, uses such as retail, hotels, tourism, leisure facilities, education, health services and residential care, (referred to as non-B use classes) can also be large employment providers. This policy covers job-generating uses such as business, industry and tourism~~; shopping and other uses within the a use classes are covered in Policy SD3~~. *Retail and other uses, including those within use class 'A' are not covered by this Policy and are dealt with in Policy SD3.* More detailed policies will be included in district plans.<br><br>*In order to prevent the incremental loss of existing employment land to non-employment uses, and to ensure an adequate supply and choice of employment land and premises for the employment market, district level plans will contain policies to safeguard existing employment sites. These policies in district plans will only permit changes of use in certain appropriate circumstances to be defined by those plans. This policy is intended to be read alongside these district plan policies when considering development proposals for any area.* | To make clear SD2 is not a retail policy, although retail is part of the wider NPPF definition of employment. In the JCS SD3 contains retail policy so the retail elements of this policy should fall into that policy. This will also make it easier to deal with retail as one policy in the immediate review.<br><br>Included to make clear the JCS does not contain all of the protection of existing employment land policies which will be developed through the District Plans, relevant to each authority. |

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| PMM034 | Policy SD2 | Policy SD2: Employment *– except retail development*<br><br>1. Employment-related development will be supported:<br><br>i. *A*~~a~~t Strategic Allocations, in line with Policy SA1*, where it is expected that employment land should normally be used for B class uses, except where it can be demonstrated that non B class uses would support the residential and B class development at that strategic allocation. In order to support key growth sectors or other key local economic drivers, on some Strategic Allocations, priority will be given to specific sectors as set out in detail in the SA site policies*; ~~or~~<br><br>ii. *At locations allocated for employment use within the Development Plan*<br><br>*iii. For the re-development of land already in employment use, or when the proposal involves a change of use from non-B class employment uses to B class uses where the proposal is of appropriate scale and character*<br><br>*iv. For the development of new employment land within Gloucester City, the Principal Urban Area of Cheltenham and Tewkesbury town,*<br><br>~~ii. for development of new or existing buildings within Gloucester, Cheltenham and Tewkesbury town; or~~<br><br>~~iii.~~*v.* in rural service centres and service villages where proposals for small- scale employment development will be supported if they are of an appropriate size and scale; ~~or~~<br><br>~~iv.~~*vi.* in the wider countryside when it is: | |

## JCS Table of Main Modifications

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| | | • located within or adjacent to a settlement *or existing employment area* and of an appropriate scale and character<br><br>• employment-generating farm diversification projects, which are of an appropriate scale and use, particularly where they involve the re-use of appropriate redundant, non-residential buildings.<br><br>*vii. where it allows the growth or expansion of existing business especially in the key growth sectors, subject to all other policies of the plan*<br><br>*viii. where it would encourage and support the development of small and medium sized enterprises, subject to all other polices of the plan*<br><br>.<br><br>~~2. Notwithstanding the above, major office or retail development will be directed to the main key urban settlements areas of Gloucester, Cheltenham and the market town of Tewkesbury. and Strategic Allocations in the first instance. Any proposal for major retail development will be considered against the sequential test and the impact test and would not normally be acceptable in the Strategic Allocations~~.<br><br>**This policy contributes towards achieving Objectives 1, 2, 3 and 9.** | Para 26 of NPPF covers this, as does the new Strat. Allocation the Principal Urban Area of Cheltenham and Tewkesbury town policy section above. We don't want to rule out offices on Employment |

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| | | | Strategic Allocations. Retail Development should be in the retail policy |
| PMM035 | 4.2.3<br>4.2.4<br>4.2.5<br>4.2.6<br>4.2.7<br>4.2.8<br>4.2.9<br>4.2.10<br>4.2.11<br>4.2.12 | **Explanation**<br><br>The JCS area is a strong, functional, economic area with a resilient economy and a diverse economic base, with excellent connectivity to the Midlands and the South West via the M5 corridor~~. Key future employment sectors include construction, wholesale, knowledge-based industry, advanced engineering, creative industry, recreation, media activities, finance, professional services, public administration and defence, residential care, and social work and health. It is important that the JCS reflects and takes account of these opportunities for business growth.~~<br><br>~~The GFirst LEP is developing a Strategic Economic Plan (SEP) to deliver its vision, which will set out how sustainable growth will be achieved across the county and through the economic programme. The LEP has three priorities:~~<br><br>~~Promotion: To promote Gloucestershire as a great place to work, visit and invest.~~<br>~~Connection: To develop the infrastructure that will support economic growth.~~<br>~~Skills: To create a highly employable and productive population.~~<br><br>*The vision and its objectives of the plan for an urban focused economic strategy, aligning with the notion of a principal urban area within the County; this is based around the promotion and regeneration of the key urban centres of Gloucester and Cheltenham, the market town of Tewkesbury and the wider rural areas of Tewkesbury Borough, supported by strategic allocations in sustainable locations. This strategy fits within the M5 growth corridor established by the SEP and balances economic potential with housing* | Substantial expansion and clarification of the economic explanation. |

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| | | *provision for the JCS area as a whole.*<br><br>*Policies SP1, SP2 and SD2 provide the policy context for the delivery of the spatial elements of the economic strategy for the JCS area, with the aim of locating jobs near to the economically active population. Details of JCS strategic employment allocations are set out in policy SP2 and the SA policies. In summary, the JCS strategic allocations include strategic employment land around Junction 9 of the M5, (strategic allocations A8 and A9), near Junction 10 employment land is included in the North West Cheltenham strategic allocation (strategic allocation A5) and at West Cheltenham strategic allocation. In addition, land to the east of junction 10 and to the west of the West Cheltenham strategic allocation is removed from the Green Belt and safeguarded to meet longer-term development needs. In addition to these growth areas within the M5 corridor, the JCS provides for employment land within strategic allocations A1 and A3.*<br><br>*This provision is in addition to the existing capacity of available employment land and any remaining land from previous development plan allocations within each authority area, extant planning permissions, as well as any employment land allocations that may be made through the City and Borough Local Plans.*<br><br>*Alongside provision proposed by strategic employment land release, all three of the JCS Councils are actively pursuing and promoting economic growth through a range of strategies and initiatives, which are informing the economic strategies being taken forward through district local plans.*<br><br>*Key growth sectors and other important local economic drivers*<br><br>*The main thrust of the economic strategy for the JCS area is to support the M5 growth corridor proposed by the SEP and to support the key growth sectors and smaller local businesses that form the backbone of the local economy. The JCS area and the wider regional economy benefit from key infrastructure and employers, which collectively establish a centre for business and employment.* | |

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| | | *M5 growth corridor*<br><br>*The SEP has highlighted the economic growth potential of the M5 corridor, and all of the JCS strategic employment allocations fall within that corridor. The SEP places particular focus around the motorway junctions.*<br><br>*There is agreement across relevant partners that the upgrading of Junction 10 to an all movements junction will support the economy of the JCS area and that of wider Gloucestershire. It would support accelerated growth of the economy, enabling land to be delivered for mixed use including high value employment. A Junction 10 task group has been set up to establish the timetable for evidencing the business case for the upgrading of this junction of the M5. Given funding timelines, the earliest funding could be available is 2021 with support through the Highways England Road Investment Strategy. All partners on the taskgroup, including the LEP are agreed that junction improvements will unlock the constraint to land currently designated in the JCS as a safeguarded area for development. At this stage, there is no certainty that this funding will be released and it is not therefore possible to anticipate any delivery within the JCS plan period; should funding become available, then the JCS authorities would consider a strategic allocation through a JCS Review.*<br><br>*There is currently a high level of demand for employment land around Junction 9 and a joint task group has been set up to consider both the development potential and the infrastructure issues that would need to be addressed; this group involves the JCS authorities, Gloucestershire County Council, the LEP, Highways England and the Homes and Communities Agency. There may be further economic development potential at some of the other junctions.*<br><br>~~This policy~~ *Policy SD2* aims to support employment development and economic prosperity by taking an economic-led, urban-focused development approach, with the primary aim of attracting investment and development to the main urban areas and the Strategic Allocations in the plan area. The strategy seeks to deliver strong, robust and resilient urban areas which create jobs and wealth. This in turn will support | |

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| | | the on-going regeneration programmes of Gloucester and Cheltenham urban areas.<br><br>~~For this reason, we are seeking to promote the centres of Gloucester, Cheltenham and Tewkesbury and some parts of the Strategic Allocations as locations for major office development which will encourage the growth of the economy and provision of high-quality employment in sustainable locations. Major office development is defined for the purposes of this policy, in line with the Town and Country Planning (Development Management Procedure) (England) Order 2010, as any application for office uses where the floor space exceeds 1,000 square metres or the site area is 1 hectare or more.~~<br><br>Employment uses, such as retail *(covered in policy SD3)*, leisure facilities, education, health services and residential care (uses outside the 'B classes') are predicted to provide over two-thirds of the projected job growth across the area. Whilst these sectors do not usually generate a specific employment land requirement, the mix of future job opportunities generated will be as important as specifically allocating parcels of land for employment provision. Employment forecasts show that the greatest B- class employment growth will be in the office, research and development sectors (Use Class B1a/b) with a decline in manufacturing and industrial jobs (B2) and with minimal growth in warehousing (B8) sector jobs.<br><br>*Key growth sectors*<br><br>*The key economic growth sectors identified in both the SEP and in the work done on behalf of the JCS authorities identify the key growth sectors in the area as:-*<br><br>• *Aviation*<br>• *Cyber technology*<br>• *Energy*<br>• *Engineering* | |

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| | | • *Financial*<br>• *Information technology*<br>• *Leisure*<br>• *Marketing and public relations*<br><br>*The SEP includes a range of programmes and interventions to support these key sectors and the growth aspirations of these sectors have played a key role in the JCS approach to economic growth and establish the level of employment land that is likely to be required to meet those aspirations.*<br><br>To assess how the need for employment land can be met, each council has ~~prepared a Strategic Assessment of Land Availability.~~*assessed how much land is likely to be available, both in terms of larger strategic sites but also sites to allow growth of existing businesses, especially in the key growth sectors, on smaller sites to support the growth of small and medium size enterprises, or where development would support urban regeneration or the rural economy.* ~~Initial assessments suggest that, overall, the JCS already has a good stock of employment land. However, not all existing sites are suitable for meeting modern employment needs, and a range of available sites and premises is needed not only to meet the requirements of potential new businesses but also to allow for the expansion of existing firms without the need to relocate. Moreover,b~~*B*ecause of the constrained supply of employment land in the urban areas, the JCS authorities will wish to evaluate the implications of changes of use. As such, policies on the safeguarding of employment sites will be set out in district plans.<br><br>Providing start-up space that can be easily accessed by those establishing new businesses is also vital to stimulate innovation and entrepreneurship within the JCS area; developments are especially encouraged which provide a range of types and sizes of units including start-up and flexible workspaces. More information and guidance in this respect will come forward in district plans. Where specialised skills are available, clusters of enterprises can add value to the economy. This spatial strategy can support skills | |

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| | | development by encouraging the provision and expansion of suitable education and training facilities with access in person and by electronic means.<br><br>The JCS authorities seek to support economic growth in the JCS rural areas and to take a positive approach in encouraging the growth and development of new and existing enterprises.<br><br>Employment-generating farm diversification projects, and the re-use of rural buildings or the creation of well-designed new buildings which are of an appropriate scale and use, will be supported wherever they accord with the other policies in the development plan.<br><br>The availability of advanced ICT infrastructure including high-speed broadband access is important for the success of the local economy and skills development. Good transport connections and adequate provision of other infrastructure are also essential to support people in employment.<br><br>*A number of other enterprises and institutions play a key role in the local economy and are supported by the policies of the JCS, in particular policies SP1, SP2 and SD2.*<br><br>*Cheltenham racecourse*<br><br>*Cheltenham Racecourse is a key part of the cultural and economic infrastructure of Gloucestershire, being the most significant visitor attraction in the JCS area and the wider sub-region. It is of international significance, being the principal venue in the UK for National Hunt Racing, on average bringing £50m p.a. to the Cheltenham economy. Ranking 2nd in the list of racecourses drawing the largest meeting attendances and with high television viewing figures (0.9million watched the Cheltenham festival in 2015), it is clear that the Racecourse and its influence underpins the cultural offer, contributing significantly to the economy of Cheltenham.*<br><br>*The Racecourse's primary function as a racing venue brings significant economic benefits to the region in* | |

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| | | *terms of financial income and job creation:*<br><br>• *450,000 visitors attend the 16 racing fixtures, including the 250,000 over the four days of the most recent Festival in March 2015. It is estimated to contribute £50m p.a.to the local tourism economy, including visitor accommodation (around 10,000 bed spaces for overnight accommodation are required during the Festival).*<br><br>• *The Racecourse currently employs 85 full time staff on site, with the additional employment of around 5,000 staff during the Festival*<br><br>• *Contractors and sub-contractors in terms of construction (and associated construction materials) and service providers are based locally in Gloucestershire and the racecourse also generates a significant number of indirect jobs*<br><br>*Cheltenham Racecourse is important to the regional economy and local economy, it is therefore important to continue to improve business operations through future development and enhancement, reinforcing its importance as a tourism and visitor attraction in the region with the potential to generate further employment opportunities.*<br><br>*Gloucestershire airport*<br><br>*Gloucestershire Airport is the busiest general aviation airport in the UK, serving a sub-regional catchment of 1.9 million people and over 84,000 businesses. The JCS recognises the strategic importance of the airport and supports the SEP for Gloucestershire, which aims to optimise the contribution and benefit that Gloucestershire Airport and the land around it can make to local communities and the economy. The airport is however located in a sensitive part of the Green Belt and any future development would need to support the airport and aviation-related growth.*<br><br>*Gloucestershire University* | |

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| | | *In common with other university towns, Cheltenham and Gloucester benefit significantly from the presence of their university. In 2015 the University commissioned research to analyse its economic impact on the region, which indicated that the University brings £151.2m of value to Gloucestershire every year. In addition, the University contributes to the social well-being of the region through community work and volunteering, and to its cultural enhancement through activities including support for festivals and links to the arts sector.*<br><br>*In order to thrive, the University needs support to provide sufficient purpose-built accommodation for students, to ensure that it remains competitive in a highly volatile market place. Since 2012, both Cheltenham Borough Council and Gloucester City Council have worked closely with the University to explore the provision of additional student accommodation. Consent was granted in 2015 for the development of a student village at the Pittville campus in Cheltenham. Gloucester City and the County Council are currently planning for the Gloucester campus, including the provision of the University Business School and additional student housing at the Oxstalls Campus at Longlevens and, through further private developments in Gloucester as part of the proposed regeneration of Blackfriars and Quayside. In terms of future growth, there is active engagement between the University and Cheltenham and Gloucester Councils about estate strategy, with a focus on expansion within their existing sites.*<br><br>*Meanwhile, the University has been adjusting its curriculum to more closely reflect the skills need demanded by the County and working in close liaison with the LEP. The Growth Hub supports new and growing business and is an example of this closer working and is funded through the local growth fund. Future opportunities relate to the growing sectors in cyber security and nuclear industries for which the County has existing advantages.*<br><br>*Tourism*<br><br>*There are no specific allocations in the JCS for tourism-related activity but, for all of the Gloucestershire authorities, tourism is an important economic activity and is broadly supported through a range of programmes and initiatives.* | |

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| | | *Tewkesbury Borough includes the Severn Vale and the internationally-renowned Cotswolds and the Borough Council supports the tourism sector through international, national and regional marketing and through business support programmes. Tourism supports jobs in the rural economy as well as supporting the vitality and viability of the market towns of Winchcombe and Tewkesbury. The importance of tourism to the rural economy will be recognised in the emerging Tewkesbury Borough Plan (2011-2031), neighbourhood plans. and in the Tewkesbury Borough Economic Strategy.*<br><br>*Gloucester's support for tourism is set out in the Growing Gloucester's Visitor Economy 2014 document, a strategic plan for driving growth in the value of Gloucester's visitor economy. This focuses on maximizing the economic benefits of the visitor economy in terms of visitor spend and job growth, and supporting the provision of good quality hotel accommodation and larger venue space. The City Council is working to deliver a number of major regeneration projects that have the potential to contribute towards addressing these aims.*<br><br>*Cheltenham Borough is currently undertaking a review of its tourism strategy and is likely to focus on building upon the strengths of collective marketing approach with the Cotswolds (including Tewkesbury) and Gloucester.*<br><br>*Regeneration*<br><br>*The reuse and regeneration of sites within the urban areas is a high priority for Gloucester.*<br><br>*The full strategy for Gloucester is set out clearly in the Regeneration and Economic Development Strategy 2015 – 2020 document, adopted by the City Council in January 2016. The issue of city centre regeneration in particular will be at the heart of the City Plan, being the key development issue for the City over the next decade and more. Mixed use regeneration initiatives to be delivered in the next decade, including Kings Quarter, Blackfriars and Bakers Quay, will be as important as new greenfield site development on the periphery of the city.*<br><br>*The regeneration of Tewkesbury town centre is a key area of work for the Borough Council. A Tewkesbury* | |

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| | | *Town Centre Masterplan: Strategic Framework Document was approved in July 2012, which set out a range of key projects aimed at regenerating the town centre; these include specific projects, such as riverside enhancement, the regeneration of key town centre sites, a new leisure centre, and a programme of marketing and inward investment.*<br><br>*The Cheltenham Development Task Force was established in 2010 by Cheltenham Borough Council with its key partners, including Gloucestershire County Council and the Homes and Community Agency; the Task Force is an arm's length advisory body with the purpose of delivering a host of regeneration outputs loosely associated with the former Civic Pride programme. Key achievements s include delivery of additional housing, including affordable, the redevelopment of a number of town centre brownfield sites, major uplift and investment to public realm in the town centre, new fit-for purpose office accommodation to enable other sites to be redeveloped in due course, key retail projects and investment in public transport. The Task Force was originally focused on a limited area within the town centre but has recently expanded its remit to cover the wider Borough of Cheltenham; this will enable new projects, such as cyber or tech hub growth ambitions to be actively pursued, which align with both the LEP strategic economic plan, the JCS and emerging components of the Cheltenham plan.* | |
| PMM036 | 4.2.13 | **Delivery**<br><br>The JCS authorities will work collaboratively with developers, businesses and the LEP to ensure that the needs of employers and the business community are being met.<br><br>*It is essential that the JCS has sufficient flexibility to act as a catalyst for long- term growth, taking account of the aspirations of the LEP and local businesses, the understanding of extended delivery times for strategic employment sites and to provide commitment to the delivery of improvements at junctions 9 and 10 of the M5.* | |
| PMM037 | SD3 | **RETAIL ~~HIERARCHY~~ *AND CITY/TOWN CENTRES*** | Chapter title changed to |

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| | Title | | reflect that the policy contains more than just the Hierarchy of centres. "City and town centres" wording changed to reflect Gloucester City's status as a City. |
| PMM038 | 4.3.2 | The nature of these centres is changing. This is ~~partly~~ *largely* due to the *structural changes in the retail market and, in particular, the impact of internet shopping* ~~recession~~ ~~and recent changes in the behaviour of shoppers, such as the increase in online shopping~~. It is important that policies are put in place that will allow our centres the flexibility to diversify whilst supporting their vitality and viability, and also to promote competitiveness in order to provide individuality, choice and diversity. The NPPF places significant weight on the importance of designated town centres and encourages local planning authorities to put in place appropriate policies that will help to maintain and enhance their vitality and viability. It recognises that successful centres are about more than shopping and that they need a range of complementary uses to attract visitors and to prosper. | Edited to enhance clarity and update |

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| PMM039 | Policy SD3 | **Policy SD3: Retail ~~Hierarchy~~ *and city / town centres***<br><br>***1. Settlement Hierarchy***<br>The area's *city and town* centres as defined below will be supported and strengthened to ensure that they continue to be the focus of communities. Initiatives which safeguard and enhance their role and function will be supported. The hierarchy of centres in the JCS area is:<br>**Key Urban Areas**<br>Gloucester *City Centre* and Cheltenham *Town Centre*<br>**Market town**<br>Tewkesbury *Town Centre*<br>**Rural service centres serving their rural hinterland**<br>Winchcombe Town Centre and Bishop's Cleeve Village Centre.<br><br>~~2. The exact town centre boundaries and primary and secondary shopping frontages to be protected will be defined in district plans. The aim in defining boundaries and frontages will be to retain the predominance of town centre uses in general and retail uses in particular.~~<br><br>***2. Cheltenham and Tewkesbury Borough Retail Policies***<br>*Retail policies within the Boroughs of Cheltenham and Tewkesbury are set out in the saved policies of the existing Local Plans. These policies will be reviewed and taken forward through the immediate review of the JCS retail policy.*<br>*Within the Boroughs of Cheltenham and Tewkesbury, new retail development will be encouraged in accordance with the policies in the saved local plans.*<br><br>***3. Gloucester City Shopping Frontages***<br>*The city centre boundary and primary shopping area boundaries, and primary frontages and secondary frontages for Gloucester city centre are set out at Appendix X of this Plan. Within the Primary Shopping Area of Gloucester City Centre, the following approach applies:* | Policy title changed to reflect that the policy contains more than just the hierarchy of centres. (1) "City and town centres" wording changed to reflect Gloucester City's status as a City and Bishop's Cleeve's status as a village. (2) Through the examination it was agreed that the retail policies of Cheltenham and Tewkesbury Boroughs would be reviewed through the review of retail policy in the JCS and this would include boundaries and frontages. (3) The is the approach for retail set out in the draft Gloucester City Plan. (4)These reflect the latest JCS retail update, provision for accommodating the floorspace will be in accordance with the principles in the policy and reviewed further through the retail review. (5) |

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
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| | | ***i. Primary frontages***<br>*Within the primary shopping frontage identified, new A1 retail development will be encouraged. The change of use of A1 (retail) premises at ground floor level will not be permitted, unless it can be demonstrated that the unit is not suitable for continued A1 use, the proposed use will maintain or enhance the vitality of the area and it would not have a significant adverse impact on the amenity of adjacent residents or businesses.*<br><br>***ii. Secondary frontages***<br>*Within the secondary shopping frontage identified, the change of use from A1 retail use to use classes A2 (financial institutions), A3 (restaurants and cafes), A4 (pubs), A5 (hot food takeaway), D1 (non-residential institutions) and D2 (assembly and leisure) will be permitted provided that it would not have a significant adverse impact on the amenity of adjacent residents or businesses, or result in a continuous frontage of two or more non-A1 retail units*<br><br>***4. Retail Floor Space Requirements***<br>Over the plan period to 2031, provision will be made for *at least* the following new *retail* floorspace ~~requirements~~ ~~in~~ *for* the ~~existing designated centres~~ *following settlements:*<br><br>~~Convenience goods floorspace capacity (sq. m net)~~ / ~~Comparison goods floorspace capacity (sq. m net) approx.~~<br>~~Cheltenham~~ ~~0~~ ~~70,000~~<br>~~Gloucester~~ ~~0~~ ~~42,000~~<br>~~Tewkesbury~~ ~~0~~ ~~825~~ | Introduction of policy supporting regeneration strategies for centres (6) Commitment to immediate review of the JCS retail policy. |

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| | | |
|---|---|---|
| ~~Winchcombe~~ | ~~250~~ | ~~450~~ |
| ~~Bishop's Cleeve~~ | ~~1,200~~ | ~~625~~ |

***Comparison goods***

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

***Convenience goods***

| ***Location*** | ***Convenience goods (net sales area, sq m)*** | | |
|---|---|---|---|
| | ***2021*** | ***2026*** | ***2031*** |
| *Cheltenham* | *577* | *1,252* | *1,805* |
| *Gloucester* | *2,120* | *2,967* | *3,664* |

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
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|---|---|---|---|
| *Tewkesbury* | *770* | *910* | *1,025* |
| *Winchcombe* | *188* | *196* | *203* |
| *Bishops Cleeve* | *1,924* | *2,031* | *1,117* |

*The provision of the above retail floorspace will be* ~~The allocation of appropriate sites for the above floorspace requirements will be set out in the district plans,~~ *accommodated in accordance with the sequential test and impact test and* having regard to the key principles set out ~~above~~ *in this policy*.

***5. Key principles for development in centres***

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

i. New residential, retail, leisure, culture, tourism, office development and community facilities that contribute to the vitality and viability of designated centres will be promoted and supported.

ii. Town centre development will be of a scale that is appropriate to its role and function as set out above and will not compromise the health of other centres or sustainable development principles.

*iii. Proposals that help to deliver the regeneration strategies for Gloucester City Centre, Cheltenham Town Centre and Tewkesbury Town Centre will be supported.*

iv. Proposals for retail and other main town centre uses that are not located in a designated centre, or are not in accordance with a policy in either the JCS or District plans, will be robustly assessed against the requirements of the sequential test and impact test, as set out in national Planning Practice Guidance, or locally defined impact assessment thresholds as appropriate.

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| | | v. The provision of new local centres of an appropriate scale to provide for the everyday needs of new communities within the identified Strategic Allocations (see Part 6 of this document) will be permitted.<br><br>*6. Retail Review*<br>*Following adoption of the JCS, this policy will be subject to an immediate review. The single issue review will take approximately two years to complete.*<br><br>**This policy contributes towards achieving Objective 2.** | |

## JCS Table of Main Modifications

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
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| PMM040 | 4.3.6 | 4.3.6 The JCS Retail Study identified several underlying weaknesses in Gloucester that need to be addressed. This includes a lack of significant investment in new retail floorspace over the recent past as well as connections between the centre with the wider footfall generators such as Gloucester Docks/Quays, the Cathedral and the bus/rail interchange. ~~It is important therefore that key regeneration proposals, such as King's Quarter, are protected from inappropriate developments elsewhere and realised in the context of the clear strategy for the City centre in its City Plan.~~ | Elaborated on in the following paragraph. |
| PMM041 | Additional text after 4.3.6 | *Gloucester City Council has an adopted 'Regeneration and Economic Development Strategy' (January 2016), which sets out a range of regeneration sites and priorities, many of which are already making good progress. This includes for example the King's Quarter area, which will provide a new, modern bus station as part of an integrated public transport interchange, as well as other main town centre uses including retail and leisure. It is important these regeneration proposals are prioritised and protected from inappropriate developments elsewhere.* | |
| PMM042 | 4.3.7 to 4.3.9 | ~~In addition to Gloucester and Cheltenham, There are other designated centres in the JCS area that provide an important but more localised function. These include the market town of Tewkesbury which provides for the catchment of the town and the surrounding rural hinterland. Tewkesbury forms the focus for food shopping in the north of the JCS area, but offers limited comparison goods shopping, the focus for this being at the other larger centres.~~ *Tewkesbury town is an important designated centre in the JCS and the primary service centre in the Borough. However, in accordance with its status as a market town, it provides a more localised function which includes the catchment of the town and the surrounding rural hinterland. Tewkesbury has a proactive regeneration partnership with brings together public, private and community organisations to deliver economic prosperity and environmental quality for the town. The partnership works to coordinate, support and facilitate the delivery of the Tewkesbury Town Centre Masterplan and projects that contribute to the future improvement of the town including the continued improvement of its retail offer.* | Elaborating on the role of Tewkesbury Town |

## JCS Table of Main Modifications

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
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| | | *Within Tewkesbury Borough, s*~~S~~maller rural service centres, such as Winchcombe and Bishop's Cleeve, provide for their residents and the residents of surrounding rural areas. Winchcombe and Tewkesbury also function as important tourist destinations.<br><br>The policy set out above has been prepared in the context of the NPPF *and Planning Practice Guidance. It is underpinned by evidence contained in* ~~and has been informed by~~ the JCS Retail Study (Phase 1*, 2011)* ~~and Phase 1 Update~~) *and the JCS Retail Study (2015)*~~, prepared by DPDS retail consultants for the JCS authorities~~. This ~~Retail Study~~ identifie~~d~~*s* floorspace requirements for ~~convenience (food) and~~ comparison goods (clothes, furniture etc) ~~shopping~~ *and convenience goods (food) for each of the main settlements identified in the hierarchy* ~~in the existing cen~~tres until *up to* 2031. ~~Where the table in the policy shows '0', this is due to existing planning commitments already providing the required floorspace.~~ The Retail Study *(Phase 1)* also provided an analysis of the health of the different designated centres in the JCS area, ~~with the exception of the smaller local centres, which have been assessed separately~~. This understanding of the health of the different town centres has helped to inform policy at JCS level and will also form a key part of the evidence in preparing the district plans.<br><br>*Following the adoption of the JCS, this policy will be subject to an immediate review.* | Providing an update on the latest retail evidence<br><br>Reinforcing the commitment to review the retail policy |
| PMM043 | Delivery 4.3.10 | These include~~, for example, the establishment of detailed town centre boundaries, Primary and Secondary Shopping Areas,~~ the allocation of *non-strategic* sites to provide for identified need, and the identification of locally defined thresholds for impact assessments (as necessary). | JCS now makes provision for town centre boundaries and frontages, which will be covered in |

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| | | | the review and…<br><br>To provide clarity on which element of the Local Plan strategic and non-strategic sites will be considered. |
| PMM044 | SD4<br>4.4.3 | The NPPF identifies a number of ways in which planning authorities can support the move to a low carbon future. These include planning for development which reduces greenhouse gas emissions~~,~~ *and* actively supporting energy efficiency improvements in existing buildings ~~and ensuring that planning policy is consistent with the Government's zero carbon buildings policy, and adopts nationally described standards~~.<br><br>~~The Government's zero carbon buildings policy requires all new domestic developments to be zero carbon by 2016, and all commercial developments by 2019. The Building Research Establishment Environmental Assessment Method (BREEAM) is the nationally recognised standard for sustainable design and construction.~~ | These paragraphs were deleted due to changes in national legislation, policy and guidance and relevant ministerial statements which remove the national Zero Carbon Buildings Policy |
| PMM045 | SD4 - Policy | Policy SD4: Sustainable Design and Construction<br><br>1. Development proposals will demonstrate how they contribute to the aims of sustainability by increasing energy efficiency, minimising waste and avoiding the unnecessary pollution of air, harm to the water environment, and contamination of land or interference in other natural systems. In doing so, proposals (including changes to existing building) will be expected to achieve ~~and where viable, exceed applicable~~ national standards.<br>All development will be expected to be adaptable to climate change in respect of the design, layout, siting, orientation and function of both buildings and associated external spaces. Proposals must demonstrate that development is designed to use water efficiently, will not adversely affect water quality, and will not hinder the ability of a water body to meet the | 1) and (5) Changes in national legislation, policy and guidance and relevant ministerial statements have removed the provision of higher standards than those required at national level. (2) Reworded to increase |

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| | | requirements of the Water Framework directive.<br><br>~~2.~~ *All development will be expected to incorporate the principles of waste minimisation and re-use. Planning applications for major development must be accompanied by a waste minimisation statement, which demonstrates how any waste arising during the demolition, construction and subsequent occupation of the development will be minimised and sustainably managed.* ~~Waste created through the process of construction should be carefully managed and reduced wherever possible. Major planning applications must be accompanied by a waste minimisation statement which demonstrates how the development will seek to minimise waste and sustainable re-use waste materials whenever possible during the lifespan of the development.~~<br><br>~~Where viable, such developments should secure 10% or more of their energy demand from decentralised (on or near site) and renewable or low carbon energy sources (including the use of combined heat and power where appropriate).~~ | clarity in response to the Gloucestershire County Council submissions. |
| PMM046 | SD4<br>4.4.6 | **Explanation**<br><br>~~Proposals to apply the relevant elements of sustainable construction frameworks such as the 'Code for Sustainable Homes' and BREEAM could be used to corroborate higher performance.~~ | |
| PMM047 | SD4<br>4.4.9 – 4.4.10 | ~~The Gloucestershire Waste Core Strategy was formally adopted in November 2012 and forms part of the statutory development plan. It is supported by as Supplementary Planning Document entitled 'Waste Minimisation in Development Projects'. The approach set out in that document is endorsed by the JCs authorities and will be used in decision taking.~~<br><br>~~The British Geological Survey mineral resource map for Gloucestershire suggests that sand, gravel and~~ | This text was deleted because the relevant policy text was also deleted. Changes in national legislation, policy and guidance and relevant |

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| | | ~~limestone resources are present; in the JCS area. To avoid the unnecessary sterilisation of these important mineral resources, the Gloucestershire Minerals Local Plan (prepared by the County council) is required to define Minerals Safeguarding Areas along with appropriate policies for managing development. Once designated, these will be shown on the JCS proposals map when it is next reviewed. Applicants for non-mineral development that might potentially sterilise such resources will be required to carry out a mineral assessment in consultation with the Mineral Planning Authority. In the interests of sustainable development, where it is environmentally and economically viable, practical and acceptable to do so, provision should be made for prior extraction of the mineral, ideally to be used within the new development.~~<br><br>*The Gloucestershire Waste Core Strategy was adopted in November 2012 and forms part of the statutory development plan. Policy WCS2 of the Waste Core Strategy specifically sets out how waste reduction should be considered, including through new development, over the JCS area as well as the rest of the county. This policy is supported by adopted Supplementary Planning Document (SPD) entitled 'Waste Minimisation in Development Projects'. The SPD has been endorsed by the JCS authorities and will be used in decision-taking.*<br><br>*Mineral resources present within the JCS area include sand and gravel, clay and limestone. To avoid the unnecessary sterilisation of these important mineral resources, the Minerals Local Plan for Gloucestershire (prepared by the County Council as the Minerals Planning Authority – MPA) is required to define Minerals Safeguarding Areas (MSAs) and set out appropriate policies for managing development. Once designated, these will be shown on the Minerals Local Plan for Gloucestershire proposals map and incorporated into the JCS proposals map when it is next reviewed. Applicants for non-minerals development, which may sterilise mineral resources, will be required to carry out a mineral assessment in consultation with the MPA. In the interests of sustainable development, where it is environmentally and economically viable, practical and acceptable to do so, provision will need to be for the prior extraction of minerals, and wherever possible this should be used within the new development.* | ministerial statements have removed the provision of higher standards than those required at national level.<br><br>This text replaces the former version and is slightly reworded to give further clarity on the role of the Minerals Safeguarding Areas and the relationship between the JCS and the Gloucestershire Minerals Local Plan. |
| PMM048 | 4.4.12 | ~~Gloucestershire Country Council commissioned a study into renewable energy capacity across the county (Entec 2010). It provided an assessment on the potential contribution of various development scenarios in generating on-site renewable energy. In most of the development scenarios assessed, it could be~~ | Reference to the study is deleted as it is no longer referred to in the policy, |

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| | | ~~demonstrated that at least 10% reduction of CO2 emissions from energy demand could be achieved through on-site renewable energy sources without impacting on viability. Some sites were shown to have potential for even greater on-site renewable energy generation. Therefore, a baseline of 10% was judged to be appropriate to use for sites across the JCS area.~~ | and the 10% target has been removed so as to be in accordance with changes in national legislation, policy and guidance. |
| PMM049 | SD4<br>4.4.17 – 4.4.18 | ~~On occasions where it can be fully and clearly demonstrated that the 10% target is not feasible or viable due to technical or site constraints, we will consider a lower percentage contribution. In such cases, proposals will need to demonstrate the full range of renewable and low carbon technologies that they have considered, and the contribution that can be achieved from these towards energy demand.~~<br><br>Delivery of the elements of this policy will come through effective development management practices ~~and may be the subject of more detailed requirements in forthcoming District plans~~. | Reference to the 10% target is deleted as it has been removed from policy.<br><br>This text is removed as there is currently no specific intention to develop policy on this area in district plans. Despite this, district plans could develop further policy on this if sound and reasonable to do so. |
| PMM050 | SD6 Green Belt<br><br>4.6.2 | ~~The JCS authorities commissioned AMEC to carry out a Green Belt Assessment in 2011 which is available to view as part of the JCS evidence base. This work represents the most up-to-date evidence on this topic and provides an independent evaluation of the wider Green Belt within the JCS area. It is a comprehensive assessment which considers how strategic segments of the Green Belt perform against the purposes of including land within Green Belt.~~ | This text was moved to later on in the chapter to improve readability. |

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| PMM051 | 4.6.5 | ~~An alternative approach to interpreting and working with the 2011 JCS Green Belt Review, and the one which has been taken forward, is to consider the detail sitting behind the AMEC assessment of each individual segment of land assessed. The AMEC report provides a useful matrix of Green Belt assessment results which individually assesses the contribution each segment makes to:~~<br><br>~~i. Checking the unrestricted sprawl of large built-up areas~~<br><br>~~ii. Preventing nearby towns from merging into one another~~<br><br>~~iii. Assisting in safeguarding the countryside from encroachment~~<br><br>~~iv. Preserving the setting and special character of historic towns.~~<br><br>~~Those parts of the Green Belt which make a significant contribution in all four categories have not been taken forward as having potential for strategic allocation. This provides a simplistic but consistent approach to the consideration of Green Belt in the assessment of potential Strategic Allocations and therefore necessary alterations to the Green Belt to allow for sustainable development. More information on how the independent Green Belt assessment was used to identify locations for Strategic Allocations is available to view as part of the JCS evidence base in the 2013 Strategic Allocations Report.~~<br><br>*The JCS authorities commissioned AMEC to carry out a Green Belt Assessment in 2011 which is available to view as part of the JCS evidence base. This work represents the most up-to-date evidence on this topic and provides an independent evaluation of the wider Green Belt within the JCS area. It is a comprehensive assessment which considers how strategic segments of the Green Belt perform against the purposes of including land within Green Belt*<br><br>*The work of AMEC follows from and assesses the Cheltenham Green Belt Review (2007) undertaken by AERC. This earlier study assesses the Green Belt within Cheltenham Borough only.* | This text was deleted to make the introduction more concise and because the new text identifies where further information on the development of the JCS Green Belt policy can be found.<br><br>This text has been added as an overview of the consideration of Green Belt as part of the JCS, including the work undertaken through examination |

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| | | *The process by which the Green Belt Assessment was used to inform the selection of broad locations and strategic allocations for development is detailed in the JCS 2013 Strategic Allocations Report (Examination Document EBLO102).*<br><br>*The Green Belt in the JCS area was a significant topic of discussion as part of the JCS examination. Further work was undertaken by the JCS authorities and is set out in the 'Green Belt topic paper' (examination document 142) and the 'Green Belt, Safeguarded Land and Spatial Strategy Update Paper' (examination document 196). The Main Modifications draft of the JCS reflects this further work, and the Inspectors interim report of May 2016.* | |
| PMM052 | SD6 Policy | Policy SD6: Green Belt<br>To ensure the Green Belt continues to serve its key functions, it will be protected from harmful development. Within its boundaries, development will be restricted to those limited types of development which are deemed appropriate by the NPPF, unless very special circumstances can be demonstrated. *That is: 'whether very special circumstances exist to outweigh the harm automatically caused to the Green Belt by virtue of the development being inappropriate and any other harm actually caused'*<br><br>The boundaries of the reviewed Green Belt are identified on the proposed Changes to the green Belt Boundary Map (see Appendix 2).<br><br>*Consideration will be given to a limited review of the Green Belt in other locations as necessary through the Borough Plans, where this is justified by exceptional circumstances*<br><br>Gloucestershire Airport, Cheltenham Racecourse, *existing waste management facilities in the Green Belt operating in accordance with extant planning permission,* and the waste management sites allocated in | (1)Insertion of the full 'very special circumstances' test (3) This new policy provision makes clear that Borough Plans may further review the Green Belt where this is justified by exceptional circumstances (4) Additional wording to clarify that the policy provision applies to existing consented waste facilities in the Green Belt and include reference to the 'very special |

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| | | the Gloucestershire Waste Core Strategy, are designated as developed sites within the green Belt that are acknowledged as having wider benefits where the co-location of facilities can be determined as essential to their use. Notwithstanding this, further development in any of these locations will need to meet the requirements of green Belt policy in the NPPF *and/or National Planning Policy for Waste,* be in accordance with the development Plan, and not compromise the openness of the Green Belt or increase the risk of urban sprawl*, unless very special circumstances can be demonstrated.*<br><br><u>Gloucestershire Airport</u><br><br>i. Gloucestershire Airport is shown on Inset Map 1 (see Appendix 3)<br>ii. In the Essential Operational Area of the airport, new structures, buildings or extensions to buildings will only be permitted if they are essential to the operation of the airport and require an airport location<br>iii. Elsewhere within the airport, in the Non-Essential Operational area, business uses which support the airport will be permitted.<br><br><u>Cheltenham Racecourse</u><br><br>At Cheltenham Racecourse, as shown on Inset map 2 (Appendix 4), development, including extensions, will only be permitted where:<br><br>i. The development is principally related to the business of the racecourse<br>ii. The development does not extend beyond the confines of the *'Racecourse Policy Area'* (as show on Inset Map 2).<br><br><u>Waste Management Sites</u><br><br>The Gloucestershire Waste Core Strategy allocates sites for waste ~~management~~ *recovery* facilities, | circumstances' test for Green Belt development not otherwise in accordance. (7) Wording amended to clarify the nature of waste facilities in the Green Belt and specify their need to be in conformity with the Development Plan, NPPF and NPPW. (8) (i) In the submission plan the area around the Sewage Treatment Works at Hayden was known as a "Development Exclusion Zone". Odour modelling work through the statement of common ground has shown that the full area covered by the zone need not entirely exclude development, and proposals will need to do further work to demonstrate where development, with appropriate mitigation can take place. Therefore this provision has been retitled |

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| | | *including* within the Green Belt. ~~When determining planning applications, any specific need for waste treatment in a particular location, for example the co-location of related waste facilities, along with proximity to the main sources of arising and the wider environmental benefits of a proposal should be assessed as material factors in decision-taking.~~ *Future waste development on allocated sites in the green Belt should be in accordance with development Plan, and be consistent with the NPPF and National Planning policy for Waste.*<br><br><u>Safeguarded Areas</u><br><br>i. An area of land west of Cheltenham, as shown on Inset Map 4 (Appendix 6), will be safeguarded for longer-term development needs. A large area of ~~this safeguarded~~ land *at West Cheltenham* is also designated as ~~a Development Exclusion~~ *an Odour Monitoring* zone, where development which is likely to be significantly affected by odours will not be permitted<br>ii. An area of land at north west Cheltenham, as shown on strategic Allocation plan A5, will be safeguarded for longer-term development needs<br>*iii. An area of land at Twigworth, as shown on strategic Allocations Plan A1, will be safeguarded for longer-term development needs*<br>iv. Safeguarded areas are not allocated for development at the present time. Planning permission for the permanent development of safeguarded land (except for uses that would not be deemed inappropriate within the Green Belt) will only be granted if a future review of the JCS deems the release of this land necessary and appropriate and proposes the development.<br>v. Should any land be released in the safeguarded area, development proposals will be assessed against the following criteria:<br><br>- Development must be well-integrated and planned as part of any urban extension of | 'Odour Monitoring Zone'.<br><br>(iii) addition of safeguarded land at Twigworth following the inclusion on a strategic allocation at this location.<br><br>(v) Wording amended to reflect the need for physical connectivity of |

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| | | strategic scale, directly and substantially *physically* linked to the urban area of Cheltenham<br>- Development must be well-related to public transport and other existing and planned infrastructure and where it makes a positive contribution to the setting of Cheltenham<br>- Development must not lead to a piecemeal, isolated or inefficient use of land in this area. | any potential scheme |
| PMM053 | 4.6.12 – 4.6.14 | Because of the Racecourse's location in the Green Belt, new development will need to be well related to the business of the Racecourse, ~~although this would necessarily preclude its use for other activities where these are appropriate Green Belt.~~ *For example, new hotel or conferencing buildings may be permitted within the Racecourse policy Area, so long as these do not detract from or limit the current use or future growth of the area for horse racing.*<br><br>The Cheltenham Racecourse policy area has been ~~slightly~~ amended from that shown in the 2006 Cheltenham Plan to allow for further growth of facilities required for the business of the racecourse.<br><br>*The Green Belt accommodates existing waste management facilities. It also contains allocated sites for facilitating the development of strategic residual waste recovery facilities as set out in the adopted Gloucestershire Waste Core Strategy. Waste allocations within the Green Belt are for the purpose of contributing towards ensuring there is sufficient provision to meet forecast local needs for waste management infrastructure in Gloucestershire up to 2027. Future development proposals on waste allocations within the Green Belt will normally be determined by the local Waste Planning Authority (WPA).*<br><br>*All such proposals should be in accordance with the Development Plan and be consistent with the NPPF and National Planning Policy for Waste unless very special circumstances can be demonstrated. A lack of suitable and available non-Green Belt sites; the demonstration of particular locational needs such as proximity to main waste arising; and a beneficial operating relationship with existing waste management* | Text amended to clarify that new hotel or conferencing facilities could be appropriate in the Racecourse Policy Area so long as in accordance with the Development Plan as a whole.<br><br>Deleted because the Racecourse Policy Area has been increased in size since the submission of the JCS to further sustainably accommodate the needs of the Racecourse, balancing the sensitivity of the Green Belt.<br><br>Text modified to take into account the submissions |

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| | | *facilities are matters, along with the relative sensitivity of the green Belt to development in relation to its five purposes should be taken into account when determining whether very special circumstances could exist in relation to future waste management proposals.* ~~Three waste management facilities identified in the Gloucestershire Waste Core Strategy (2012) are within the Green Belt. When determining planning applications, any specific locational need for waste treatment in a particular place as well as the wider environmental benefits of a proposal should be assessed as a material factor in decision-taking. Despite this, considerable weight should be attached to the value of the green Belt designation as set out in NPPF and in this plan.~~ | from the County Council on waste sites in the Green Belt, including the role of already consented sites within the designation and an overview of some of the principles guiding future decision making. |
| PMM054 | 4.6.15 – 4.6.18 | **Other amendments to the Green Belt boundary**<br><br>~~Shurdington~~<br>~~Amendments have been made to the Green Belt boundary at Shurdington, shown on inset map 3 9appendix 5), to allow limited development and to provide a more appropriate boundary.~~<br><br>~~The amendments to the boundary at Shurdington include the existing playing field to the north of the settlement, and also land and existing built development to the south of the settlement. These amendments seek to provide a more appropriate Green belt boundary and also to allow for limited development to take place, where appropriate, and in accordance with Policies INF4 and INF5.~~<br><br>*West Cheltenham*<br>*A change has been made to the Green Belt boundary to the north of the strategic allocation at West cheltenham and to the south of the allocation at north West Cheltenham in the area of the Old Gloucester Road and Arle Nurseries. This is to provide a more appropriate Green Belt boundary after the removal of the strategic allocations from the Green Belt.*<br><br>South West Cheltenham<br>A small change has been made to the green Belt boundary at the south west of Cheltenham (known as the former M&G site) to provide a more appropriate boundary after an implemented permission. | Removed because these amendments to the Green Belt boundary are no longer being furthered through the JCS, although they may be examined again through the Tewkesbury Borough Plan. |

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| | | *A small change has been made to the green Belt boundary in the area of the Reddings to provide a more appropriate boundary after an implemented permission at Grovefield Way.* | This text was included to remove from the green belt the consented and started scheme at Grovefield way as discussed through the examination. |
| PMM055 | 4.6.21 – 4.6.22 Safeguarded Land | A significant constraint on the safeguarded land at West Cheltenham is the operation of Hayden Sewage Treatment Works, which is a long-established site with an area of around 22 hectares. The Sewage Treatment works *has been upgraded in recent years, but still* emits odours which have the potential to seriously affect any development that occur nearby.<br><br>*Currently an area in the Green Belt around Hayden Sewage Treatment Works is identified in the Cheltenham and Tewkesbury Local Plans as a Development Exclusion Zone. The JCS on adoption will replace this designation with a similar area identifying the need for Odour Monitoring. Odour modelling work through the statement of common ground between the JCS authorities and the West Cheltenham Consortium has shown that the full area covered by the zone need not entirely exclude development, and proposals will need to demonstrate where development, with appropriate mitigation, can take place.* ~~Recent works to upgrade the Sewage Treatment Works means that there is potential that the Development Exclusion Zone around the works which is currently identified in the 2006 Cheltenham Borough Local Plan could be reduced in size. However, this work is on-going and no results have yet been released.~~ *In parallel to reducing odour emissions, Severn Trent is committed to the future development opportunities associated with this site. This includes ongoing assessment of the viability of whole sale relocation of the existing treatment works. In time, this would enable the entire area of the Safeguarded Land to be released for development.*<br><br>~~On review of the JCS, some or all the land at this location may be capable of development when needed, particularly if the relocation of Hayden Sewage Treatment Works can be facilitated through~~ | Updated to show that the works is the subject to ongoing updating and upgrades<br><br>The authorities have a statement of common ground with the consortium at West Cheltenham (exam 198) which describes ongoing work regarding odour |

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| | | ~~redevelopment of the area.~~ *On review of the JCS as work advances on the West Cheltenham Site, the Odour Monitoring Zone could be reduced or removed in accordance with the evidence base and mitigating works undertaken as part of the development of the allocation.*<br><br>*The designation of the Odour Monitoring Zone in the JCS at West Cheltenham does not prevent development at the West Cheltenham strategic allocation except where such development would be significantly affected by odours. Further work through the master planning of the development along with appropriate mitigation will facilitate the development of the site. Decision takers should weigh the evidence presented as to the impact of odour on a particular proposal in this area, taking into account policy SD15 Health and Environmental Quality of the JCS, and relevant advice from the Environment Agency or other expert body.*<br><br>*An area of Safeguarded Land has been identified at Twigworth adjacent to land that has been included as a strategic allocation at this location. In making an allocation at Twigworth and removing it from the Green Belt it has been necessary to identify new Green Belt boundaries that are strong and defensible. At Twigworth the boundaries have been redrawn using the well-defined features of Frog Furlong Lane, Down Hatherley Lane and the Tewkesbury Road (A38). However, the resulting area to be removed from the Green Belt is larger than the development site that is available for allocation now through the JCS. As the remaining area is not available for development, but would be removed from the Green Belt, it was been identified as Safeguarded Land which could provide a potential development option in future through a review of the JCS.* | reduction for the site. As work advances on the West Cheltenham Site, the Odour Monitoring Zone could be reduced or removed in accordance with the evidence base and mitigating works undertaken by Severn Trent.<br><br>Explanation of the Safeguarded Land at Twigworth that has resulted from the strategic allocation in this area. |
| PMM056 | SD8 Policy | Policy SD8: The Cotswolds Area of Outstanding Natural Beauty (AONB)<br><br>All development proposals in ~~adjacent to~~ *within the setting of* the Cotswolds AONB will be required to conserve and, where appropriate, enhance its landscape, scenic beauty, wildlife, cultural heritage and other special qualities. Proposals will be required to be consistent with the policies set out in the | SD8 wording amended to "within the setting of" agreed during the examination session on the policy and in |

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| | | Cotswolds AONB Management Plan. | accordance with national policy and guidance |
| PMM057 | SD9<br>Policy no. 5 | Policy SD9: Historic Environment<br><br>Development proposals at Strategic Allocations must have regard to the findings and recommendations of the JCS Historic Environment Assessment (or any subsequent revision) *demonstrating that the potential impacts on heritage assets and appropriate mitigation measures have been assessed.* | SD9 (5) Added to reflect the representations of Historic England on the importance of assessing impacts on heritage assets. |
| PMM058 | SD10 Policy Number 2 | Policy SD10: Biodiversity and Geodiversity<br><br>This will be achieved by:<br>- Ensuring that European protected Species and National protected Species are safeguarded in accordance with the law<br>- Conserving and enhancing biodiversity and geodiversity on internationally, nationally and locally designated sites, and other assets of demonstrable value where these make a contribution to the wider network, *thus ensuring that new development both within and surrounding such sites has no unacceptable adverse impacts* | Change suggested by Natural England to capture development outside of a designated site. |
| PMM059 | 4.10.7 | The JCS provides an opportunity to deliver some of the objectives and complement the work programme of the Local nature Partnership (LNP). The three local authorities are all partner organisations of the LNP, helping to deliver actions to address the needs of priority species and habitats as well as plans for other biodiversity and geodiversity assets of local importance or interest. The Gloucestershire Nature Map *at Appendix 8* sets out spatial priorities for ecological conservation and enhancement across the county. | New map |
| PMM060 | 4.10.12 | The JCS requires developers to avoid harm to biodiversity or, where this is not possible, to incorporate | Reflecting representations |

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| | | mitigation measures into the design of developments. *Developers should also ensure that development outside designated sites will not cause reasonably foreseeable harm to those sites, and if such an effect is likely, should mitigate against it.* For situations where measures cannot be provided on-site, the local authorities may in certain circumstances consider a system of 'biodiversity offsetting'. In addressing the impacts of potential developments on geodiversity, it is intended that the councils will follow a similar approach to that proposed for biodiversity, based on avoidance, on-site mitigation and off-site compensation (for example, by improving the exposure of the geological feature). | by Natural England |
| PMM061 | SD11 Policy number 2, 3, 4 | Policy SD11: Residential Development<br><br>Housing development will be permitted *at sites allocated for housing through the development plan, including* Strategic Allocations and *allocations in* ~~on sites that are allocated for housing by~~ district and neighbourhood plans.<br><br>On sites that are not allocated, housing development and conversions to dwellings will be permitted on previously-developed land in the existing built-up areas of Gloucester City, *the Principal Urban Area of* Cheltenham and Tewkesbury towns, rural service centres and service villages *except where otherwise restricted by policies within district plans.*<br><br>Housing development on other sites will only be permitted where:<br>- It is for affordable housing on a rural exception site in accordance with Policy SD13 or<br>- It is infilling within the existing built-up areas of *the City of Gloucester* ~~cities,~~ *the Principal urban Area of Cheltenham, Tewkesbury Borough's* towns and villages *except where otherwise restricted by policies within district plans,* or | 2) provide clarification that policy relates to sites that are allocated for housing development. (3) clarification that housing development must be balanced other policies within the district plans. (4ii) To better define the areas where infilling may be appropriate. |
| PMM062 | 4.11.4 | In accordance with Policy SP2, new housing will be delivered within the two main urban centres of Cheltenham and Gloucester and through urban extensions to those centres to meet needs where they arise. Development is directed to Tewkesbury town in accordance with its role as a market town and to rural service centres and service villages. This will include sites allocated in district or neighbourhood plans and additional windfall sites. Windfall development on previously-developed land within cities, towns, rural service centres and service villages is supported in principle, subject to the other policies in | More detailed policies on this issue will be dealt with through district plans. |

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| | | this strategy and the relevant district and neighbourhood plans. ~~In addition to this, proposals that will bring empty space back into use are encouraged.~~ | |
| PMM063 | 4.11.5 | Outside cities, towns, rural service centres and service villages, there are generally insufficient facilities to support development and so they are not considered sustainable locations for residential development. Hence, new residential development is not considered appropriate unless specific exceptions are made within JCS, district or neighbourhood plan policies. For the purpose of this policy (4 ii), infill development means the development of an under-developed plot well related to existing built development. Additional special circumstances where housing development may be acceptable are listed in NPPF Paragraph 55. | |
| PMM064 | 4.11.10 | The JCS local authorities carry out an annual assessment of land availability, incorporating the ~~SHLAA~~ *SALA* , to identify sites that may be suitable for housing or other uses. This includes a record of brownfield and greenfield sites within the main settlement areas that may have potential for housing development. The assessment is therefore an important part of the evidence base for the planning of future housing delivery. ~~The JCS authorities are committed to developing a shared methodology with other local authorities in the Housing Market area and using this work to inform local site allocations and housing supply policies.~~ | Shared approach to SALA already in place between JCS authorities. A working group has been established across Gloucestershire. |
| PMM065 | SD12<br>4.12.3 | **Explanation**<br><br>It is important to ensure that housing provision is responsive to local market changes and the needs of the local area, providing accommodation for people with different needs and at different stages in their lives. Local authorities are required by the NPPF to plan for a mix of housing and to identify the size, type, tenure and range of housing that is required. This information is contained in the local housing evidence base, which includes the JCS Assessment of Housing Requirements, the Gloucestershire SHMA 2014 *and 2015 JCS update,* and other data held by local authorities and their partners. Developers should refer to this evidence base to ensure that their proposals will contribute to mixed and balanced communities and a balanced housing market across the county of Gloucestershire. | Provides the most up to date evidence on the SHMA. |

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| PMM066 | 4.12.6 | New housing should be designed in a way that enables households, including older people *and those with disabilities* to live comfortably. This will include having adequate space to allow home working or study, space for visitors in housing for older people, and space to allow ease of movement in specialist accommodation. Within the JCS area this will be achieved by meeting *or* ~~and~~ exceeding minimum space standards (see Delivery section below). New housing should also be built to high standards of sustainable design and construction in accordance with Policy SD4. | To encourage homes suitable for people throughout their lives.<br><br>Clarification that standards could be met or exceeded. |
| PMM067 | After 4.12.8 | *This policy also considers the needs of Gypsy, Travellers and Travelling Showpeople as part of the wider housing mix and needs in the area. Policy SD14 specifically deals with the needs of these communities who are covered by the Government's definition set out within the Planning policy for traveller Sites. However, there is still a housing requirement for those members of the community who do not meet the definition and provision for this type of accommodation should be considered as part of the general housing mix. These needs will be explored further through future work on the SHMA and district plans.* | Additional explanatory text to include that the needs of the Gypsy, Traveller and Travelling Showpeople communities should be considered as part of the housing mix in the area. This is particularly relevant as Policy SD14 now only covers those people who meet the Governnment's new definition within the Planning Policy for Traveller Sites. Other housing needs for these communities is to be considered as part of the general mix through the |

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| | | | SHMA. |
| PMM068 | 4.12.10 – 4.2.12 Delivery | The ~~Gloucestershire~~ *updated 2015* SHMA ~~2014~~ provides an indication of the number and proportion of housing of different sizes and tenures that are likely to be required in the county over the plan period. Equivalent data for each local authority area is provided within the document appendices. Developers should refer to this information (or any subsequent publication) and engage with the relevant local authority in drawing up their proposals. For development at Strategic Allocations, it will usually be necessary to consider the needs of more than one local authority area.<br><br>*The Government's housing standards review was completed in 2015 which presents a single set of national space standards. These are optional standards that can only be applied where there is a local plan policy based on evidence local need and where viability is not compromised.* ~~Subject to the findings of the government's Housing standards review~~ *The* district plans may in future *include such a policy or potentially* adopt *locally*-specific space standards. *However,* until such standards are adopted, the JCS authorities will refer to the minimum space standards employed by the Homes and Communities Agency and apply these to all types of housing.<br><br>As well as meeting minimum space standards, housing proposals will need to demonstrate how accessibility and adaptability have been considered as part of the design of the scheme. This may include providing a proportion of housing to a recognised standard, such as Lifetime Homes, where it is appropriate in the view of the local authority. For development at Strategic Allocations, the standards and proportions to be delivered should be agreed with the local authority. ~~Subject to~~ *Following* the findings of the Government's Housing Standards Review, district plans may in future *also* adopt specific standards for accessibility and adaptability. | Provides most up to date evidence on the SHMA.<br><br>Provides an update on progress of the Government's Housing Standards Review. |
| PMM0069 | SD13 Background 4.13.2 | There are three main classifications of affordable housing *as set out in Annex 2 of the NPPF:*<br><br>Housing that does not meet the above definition of affordable housing, such as 'low cost market housing', is not defined as affordable housing for the purpose of this policy. | Provides reference to currently definition of Affordable Housing contained within the NPPF. |

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| | | • Social rented housing is owned by local authorities and private registered providers (as defined in Section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime.<br>• Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).<br>• Intermediate housing is housing for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the affordable housing definition above. These can include shared equity (shared ownership and equity loans), other low-cost housing for sale and intermediate rent, but not affordable rented housing.<br><br>*The Government, through the Housing & Planning Act 2016, has also set out a duty for Local Authorities to promote the supply of Starter Homes. The Starter Homes initiative is aimed at increasing opportunities for home ownership and therefore this particular tenure of housing is to be offered for at least 20% below their market value for people who have not previously been a home buyer and want to own and occupy their own home. The Housing and Planning Act 2016 includes Starter Homes within the definition of affordable housing, however, the mechanism for introducing of the wider definition is to be subject to further legislation. Therefore, currently the definition provided within Annex 2 of the NPPF remains the most relevant.* | Provides an update on the latest position regarding Starter Homes. |
| PMM0070 | SD13 Policy Number 1, 2, 6, 7, 9 & 10 | ~~The JCS local authorities will seek through negotiation to deliver new affordable housing as follows:~~<br><br>~~1. On sites of 5-9 dwellings 9or covering 0.2 hectares or more of land), 20% affordable housing will be sought~~<br>~~2. On sites of 10 or more dwellings 9or covering 0.4 hectares of more of land), 405 affordable housing will be sought~~<br><br>1. The JCS authorities will seek, through negotiation*, for new development* to deliver new affordable | Policy altered to reflect latest JCS evidence on CIL/viability and changes to national policy and guidance on affordable housing contributions. (6) To reflect the potential that not all affordable housing tenures (such as |

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| | | housing on a sliding scale approach as set out below:<br><br>*i. Within the Strategic Allocation sites a minimum of 35% affordable housing will be sought.*<br>*ii. Outside of the Strategic Allocation sites, on sites of 11 dwellings or more, or sites with a maximum combined gross floor space of greater than 1000sqm; a minimum of 20% affordable housing will be sought on developments within the Gloucester City administrative area and a minimum of 40% will be sought within the Cheltenham Borough and Tewkesbury Borough administrative areas.*<br>*iii. On sites of 10 dwellings or less, no contribution towards affordable housing will be sought.*<br>*iv. Notwithstanding the above, affordable housing policy for sites of 10 dwellings or less may be applied under policies set out within district plans.*<br><br>2. ~~For the purpose of this policy, residential units are dwelling houses~~ This policy applies to dwellings (as defined by use class C3) and also any self-contained units of accommodation within a residential institution (use class C2). Where a development site has been divided into parts, or is being delivered in phases, the site will be considered as a whole for the purpose of determining the appropriate affordable housing requirement.<br><br>6. Provision should be made*, where possible,* to ensure that housing will remain at an affordable price for future eligible households, or that subsidy will be recycled for alternative affordable housing provision.<br><br>7. In certain circumstances, where there is clear evidence of a local housing need that cannot be met elsewhere, affordable housing will be permitted on rural exception sites. A rural exception site must be within, or on the edge of, a rural settlement. It should be of a ~~small~~ scale ~~and~~ well related to the | Starter Homes) can meet this requirement. (7) to provide clarity on the definition of the scale of new development |

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| | | settlement both functionally and in terms of design.<br><br>*9.* If a development cannot deliver the full affordable housing requirement, a viability assessment, *conforming to an agreed methodology*, in accordance with Policy INF7 will be required. *Viability assessments will be published in full prior to determination for all non-policy compliant schemes. Where necessary the JCS authorities will arrange for them to be independently appraised at the expense of the applicant.*<br><br>*10. The viability of a site may enable additional levels of affordable housing to be delivered above the requirements set out in this policy. The JCS authorities will negotiate with developers to find an appropriate balance to deliver affordable housing and infrastructure needs.*<br><br>~~For the purpose of~~ This policy, ~~residential units are dwelling~~ ~~houses~~ applies to dwellings (*as defined by* use class C3) and also any self-contained units of accommodation within a residential institution (use class C2). Where a development site has been divided into parts, or is being delivered in phases, the site will be considered **as a whole** for the purpose of determining the appropriate affordable housing requirement<br><br>Provision should be made, *where possible*, to ensure that housing will remain at an affordable price for future eligible households, or that subsidy will be recycled for alternative affordable housing provision.<br><br>**Rural exception sites**<br>In certain circumstances, where there is clear evidence of a local housing need that cannot be met elsewhere, affordable housing will be permitted on rural exception sites. A rural exception site must be within, or on the edge of, a rural settlement. It should be of a ~~small~~ scale ~~and~~ well related to the settlement both functionally and in terms of design. | |

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| | | If a development cannot deliver the full affordable housing requirement, a viability assessment, *conforming to an agreed methodology*, in accordance with Policy INF7 will be required. *Viability assessments will be published in full prior to determination for all non-policy compliant schemes Where necessary the JCS authorities will arrange for them to be independently appraised at the expense of the applicant.*<br><br>*The viability of a site may enable additional levels of affordable housing to be delivered above the requirements set out in this policy. The JCS authorities will negotiate with developers to find an appropriate balance to deliver affordable housing and infrastructure needs.* | |
| PMM0071 | 4.13.4 onwards | The Gloucestershire SHMA 2014, *updated in September 2015*, provides evidence relating to affordable housing needs in the JCS area. It includes a Long-Term Balancing Housing Markets (LTBHM) model which informs this policy by providing an indication of the levels of affordable housing required from 2013-2031 to achieve a balanced housing market. Policy SD13 has also been informed by:<br><br>• Planning commitments at the base date of the LTBHM model (2013)<br>• The composition (by site size) of expected housing delivery over the plan period, based on Policy SP2. This includes assumptions about district capacity and windfall development that are informed by assessments of land availability and past trends in housing delivery.<br>• An assessment of the viability of the JCS affordable housing policy and of the JCS as a whole, taking account of the cumulative requirements of all policies *and the potential for Section 106 and Community Infrastructure Levy contributions*.<br><br>The policy reflects a strategic partnership approach to affordable housing delivery across the JCS area. This consistency of approach will help to ensure that full housing needs can be met in a way that supports urban regeneration and does not place onerous requirements on any individual local authority. *The latest evidence from the 2015 SHMA, which emerged through the JCS examination, determined that* | Provides updated evidence on the SHMA<br><br>To reflect latest JCS |

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| | | *there is a need for 638 affordable houses per year across the JCS area.* ~~Taking account of the factors listed above, the JCS authorities together will need to deliver 39% affordable housing on sites of five or more residential units. Although some sites will deliver 100% affordable housing (for example where the developer is a specialist provider), in recent years many sites have not delivered the full affordable housing requirement due to viability. For these reasons, in order to allow some flexibility in meeting the full affordable housing need, a requirement of 40% is set for development of 10 or more residential units, subject to the viability of development.~~ | evidence on viability. Updated to include latest affordable need figure and abbreviated to aid readability. Further narrative is provided in the evidence base documents. |
| | | *Viability is key factor in a sites ability to contribute towards affordable housing needs and an important consideration in setting the appropriate level of contributions from new development. The latest viability evidence presented by the 'Plan Viability, Community Infrastructure Levy and Affordable Housing Study' (February 2016) demonstrates that viability across the JCS area and between different development types can differ significantly. Sites across the JCS area will be able to contribute to affordable housing a greater or lesser degree depending on the circumstances of each case. The viability and infrastructure challenges need to be taken into account when considering how we meet the overall need for affordable housing across the wider area.* | Provides explanatory text on the issues of viability across housing developments in the JCS area. |
| | | *Policy SD13 reflects the need to ensure that smaller residential developments remain viable while still contributing towards essential infrastructure needs. For this reason, affordable housing is not required on sites of 0-10 residential units. This is in accordance with national policy and guidance. The policy also reflects the viability of differing value areas that exist across the JCS and as such requires that sites of 11 or more dwellings provide a 40% contribution within Cheltenham and Tewkesbury, but only a 20% contribution within Gloucester.* | Provides justification of the approach to affordable housing across the JCS area. |
| | | *The Strategic Allocations in the JCS present altogether different viability considerations from the rest of the area. The latest viability work evidences that, for Strategic Allocations, a 35% affordable housing contribution could be viable. However, it is recognised that each of these allocations will have their own* | |

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| | | *individual deliverability and viability challenges. Therefore there will need to be balance between infrastructure provision and affordable housing in the context of deliverability. Some development proposals on the Strategic Allocations may be able to achieve greater than 35% affordable housing, while others may require a greater focus on infrastructure provision to deliver the site leading to a lower affordable housing contribution. Each proposal will be submitted with a detailed viability evidence to determine the appropriate balance.*<br><br>~~Policy SD13 reflects the need to ensure that smaller residential developments remain viable. For this reason, affordable housing is not required on sites of 0-4 residential units. On sites of 5-9 residential units there is a lower affordable housing requirement of 20%.~~<br><br>*The national Planning Practice Guidance states that affordable housing contributions should not be sought from developments of 10 units or less and this has been reflected in this policy. However, the guidance also sets out that, in designated rural areas (section 157(1) of the Housing Act 1985), local planning authorities may choose to apply a lower threshold of 5 units or less. Where a lower threshold is applied developments of between 6 and 10 units would be subject to affordable housing contributions but in the form of commuted cash payments only. There are areas within the JCS that would fall under this rural area designation, such as the Cotswold AONB, and therefore each authority may choose to apply a lower threshold where appropriate. Further detail and policies may be provided through the district-level plans.*<br><br>In accordance with Policy SD12, a flexible approach is taken to the mix of housing tenures, types and sizes to be provided. This will allow local authorities and developers to refer to the most up-to-date evidence on housing need and to take account of the local context. For development at Strategic Allocations it will usually be necessary to consider the needs of more than one local authority area.<br><br>*As part of the mix of affordable housing, developments should also consider the needs of specialist* | Provide justification of the approach to affordable housing at Strategic Allocations.<br><br>Provides explanatory text on the issues of viability across housing developments in the JCS area. |

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| | | *accommodation and how a site could contribute towards delivering them. This may include provision for affordable Gypsy, Traveller and Travelling Showpeople pitches and/or plots in line with any needs identified through the latest Gypsy and Traveller Accommodation Assessment and the SHMA. This would include the needs of these communities who are identified either within or outside the Government's definition set out through the Planning Policy for Traveller Sites.* | Additional explanatory text to include that the affordable needs of the Gypsy, Traveller and Travelling Showpeople communities should be considered as part of this policy. This is particularly relevant as Policy SD14 now only covers those people who meet the Government's new definition within the Planning Policy for Traveller Sites. Other housing needs for these communities is to be considered as part of the general mix through the SHMA. |
| PMM0072 | **Policy SD14**<br><br>4.14.1, 2 & 3 | 'Planning Policy for Traveller Sites' *(PPTS)* was *first* published by the Government in March 2012 and ~~aligns~~ *aligned* planning policy for traveller communities more closely with other forms of housing. It introduced, for example, the requirement for councils to demonstrate a five-year supply of pitches/plots against locally-assessed targets based on robust local evidence. *A replacement to the original 2012 PPTS was first published on the 31 August 2015 by the Department of Communities and Local Government, which provides a new definition of Gypsies, Travellers and Travelling Showpeople for planning purposes. Under the new guidance only those people of nomadic habit of life, including those that have ceased to travel temporarily on grounds only of their own/ their family or dependants educational or health needs* | New background text to reflect the Government's latest Planning Policy for Traveller Sites. |

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| | | *or old age, are defined as Travellers in planning terms. All other accommodation needs for those members of the community that have ceased travelling permanently must now be considered in the context of the Strategic Housing Market Assessment (SHMA). Therefore, Policy SD12 ensures that the needs of those no longer meeting the definition in planning terms are planned for in appropriate accommodation in line with Government Guidance on the periodical review of housing needs: Caravans and Houseboats (July 2016). For the purposes of establishing the need for sites and yards in light of the change to the definition and to identify the resulting needs of both travelling households and non-travelling households, an up to date Gypsy and Traveller Accommodation Assessment (GTAA) was undertaken in early 2016, replacing the Gloucestershire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTTSAA) 2013.*<br><br>The JCS area has long-established Gypsy, Traveller and Travelling Showpeople communities. There are many reasons for this, including excellent road connections, proximity of land close to the urban areas for access to services and employment opportunities, and strong family ties. ~~There are particular concentrations in~~ Tewkesbury Borough *is home to the majority of communities within the JCS area*~~, close to the urban areas of Gloucester and Cheltenham.~~ .<br><br>~~A Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTTSAA), published in 2013, identifies the need for additional pitches/plots for different traveller communities for Gloucestershire between 2013 and 2031. A summary of these needs for the JCS authorities is provided at paragraph 4.130 and Table C4 of that report, which can be downloaded in full from the JCS website.~~ *The GTAA 2016 Update provides a robust and credible evidence base to be used to guide the implementation of development plan policies and the provision of new Gypsy and Traveller pitches and Travelling Showpeople plots for the period 2016-2031.* | Modified to enhance readability.<br><br>Updated to reflect new assessment based on Governments latest Planning Policy for Traveller Sites. |
| PMM0073 | SD14 Policy | **Policy SD14: Gypsies, Travellers and Travelling Showpeople**<br><br>*1. Existing permanent residential and transit Gypsy, Traveller and Travelling Showpeople sites,* | (1) To ensure the protection of existing GTTS sites. (2) clarification that |

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| | | *identified on the proposals map, will be protected from development to alternative uses.*<br>2. ~~All~~ Proposals for new *permanent and temporary, residential and transit* Gypsy, Traveller and Travelling Showpeople sites will be assessed against the following criteria:<br><br>~~There is a proven need for the development and/or the capacity of the site can be justified to meet needs for further gypsy traveller and travelling showpeople sites, or extensions to existing sites.~~<br><br>i. Proposals on sites in areas of sensitive landscape will be considered in accordance with Policy SD7 (Landscape Policy) and Policy SD8 (The Cotswolds Area of Outstanding Natural Beauty). In all other locations the proposal ~~will~~ *must* not have an unacceptable impact on the character and appearance of the landscape and the amenity of neighbouring properties, and ~~is~~ *should be* sensitively designed to mitigate any impact on its surroundings. | it includes permanent, temporary, residential and transit sites (3) provide additional protection against the development of sites subject to hazards. |
| PMM0074 | Explanation 4.14.4 | The Gloucestershire *GTAA 2016* sets out the need for new pitches/plots resulting from existing traveller communities in Gloucestershire *between a new base date of 2016* ~~2013~~ and *the plan end date of* 2031. Within the JCS area, the assessment sets out the requirement for provision of ~~151 permanent~~ *8* pitches for Gypsies and Travellers (as shown in Table C4 below) *who meet the 2015 definition of Travellers for planning purposes.* ~~Of these, 147 pitches relate to communities that currently reside in Tewkesbury Borough~~ *All of this confirmed need is within Tewkesbury borough and has been identified as a need for privately owned sites. However regardless of planning status, under the Housing Act 1985 the local authority must assess and plan for the housing needs of all communities residing in their area. The assessment, therefore, also sets out the accommodation needs for those who have been confirmed to no longer meet the 2015 definition and an estimate of the type and level of accommodation required by those who are unknown as a result of either being unwilling or unavailable for interview. The assessment also sets out a requirement for the provision of 29 plots for Travelling Showpeople who meet the 2015 definition. Of these, 21 plots are identified for communities that currently reside in Tewkesbury borough,* | Provide explanation of the impact of the latest Government guidance on Planning Policy for Traveller Sites on the latest GTTA 2016. |

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>with 8 in Gloucester City.<br><br>The housing needs of the Gypsy, Traveller and Travelling Showpeople households who do not meet the new definition of a Traveller, or whose status is unknown, will now be assessed as part of the wider housing needs of each area through the SHMA. The affordable requirement of this community, identified as ‘public’ in the GTAA, along with other forms of affordable provision, will be addressed as part of the overall affordable housing requirement as set out in Policy SD13.</td><td>Clarification that the needs of those who do not meet the new PTTS definition will be dealt with through the SHMA. Any affordable need will be met through Policy SD13.</td></tr>
<tr><td>PMM0075</td><td>Table C4 and C5</td><td>Table C4 – Permanent Gypsy and Traveller Pitch Requirements in the JCS area
<table>
<tr><td>~~Local Authority~~</td><td colspan="2">~~2013-2017~~</td><td colspan="2">~~2018-2022~~</td><td colspan="2">~~2023-2027~~</td><td colspan="2">~~2028-2031~~</td><td>~~Total~~</td></tr>
<tr><td></td><td>~~Public~~</td><td>~~Private~~</td><td>~~Public~~</td><td>~~Private~~</td><td>~~Public~~</td><td>~~Private~~</td><td>~~Public~~</td><td>~~Private~~</td><td></td></tr>
<tr><td>~~Cheltenham~~</td><td>~~0~~</td><td>~~1~~</td><td>~~0~~</td><td>~~0~~</td><td>~~0~~</td><td>~~0~~</td><td>~~0~~</td><td>~~1~~</td><td>~~2~~</td></tr>
<tr><td>~~Gloucester~~</td><td>~~0~~</td><td>~~1~~</td><td>~~0~~</td><td>~~0~~</td><td>~~0~~</td><td>~~0~~</td><td>~~0~~</td><td>~~1~~</td><td>~~2~~</td></tr>
<tr><td>~~Tewkesbury~~</td><td>~~20~~</td><td>~~44~~</td><td>~~12~~</td><td>~~15~~</td><td>~~13~~</td><td>~~16~~</td><td>~~12~~</td><td>~~15~~</td><td>~~147~~</td></tr>
<tr><td>~~Total~~</td><td>~~20~~</td><td>~~46~~</td><td>~~12~~</td><td>~~15~~</td><td>~~13~~</td><td>~~16~~</td><td>~~12~~</td><td>~~17~~</td><td>~~151~~</td></tr>
</table></td><td></td></tr>
</table>

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*Meet the PPTS 2015 Definition*

| *Local Authority* | *2016-2021* | | *2021-2026* | | *2026-2031* | | *Total* |
|---|---|---|---|---|---|---|---|
| | *Public* | *Private* | *Public* | *Private* | *Public* | *Private* | |
| *Cheltenham* | *0* | *0* | *0* | *0* | *0* | *0* | *0* |
| *Gloucester* | *0* | *0* | *0* | *0* | *0* | *0* | *0* |
| *Tewkesbury* | *0* | *5* | *0* | *1* | *0* | *2* | *8* |
| *Total* | *0* | *5* | *0* | *1* | *0* | *2* | *8* |

***Table C5 – Permanent Travelling Showpeople Plot Requirements in the JCS area***

*Meet the PPTS 2015 Definition*

| *Local Authority* | *2016-2021* | | *2021-2026* | | *2026-2031* | | *Total* |
|---|---|---|---|---|---|---|---|
| | *Public* | *Private* | *Public* | *Private* | *Public* | *Private* | |
| *Cheltenham* | *0* | *0* | *0* | *0* | *0* | *0* | *0* |
| *Gloucester* | *0* | *7* | *0* | *0* | *0* | *1* | *8* |
| *Tewkesbury* | *0* | *17* | *0* | *2* | *0* | *2* | *21* |
| *Total* | *0* | *24* | *0* | *2* | *0* | *3* | *29* |

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| PMM0076 | 4.14.5 | ~~The report also sets out that if transit pitches are considered necessary, a transit site of at least 10 pitches should be provided within Gloucestershire, but in a location in proximity to main road networks such as the M5 and A40. However, it also recommends that 'tolerated temporary stopping places' are used by some authorities as an alternative way of providing for temporary accommodation needs.~~ *The GTTSAA 2013 stated that if transit pitches are considered necessary, a transit site of at least 10 pitches should be provided within Gloucestershire. Alternatively, the report recommended the use of a formal 'temporary toleration' policy, to meet the needs of Gypsies and Travellers moving through the County, without the need to establish a formal transit site, which can often be difficult to manage and maintain. Since the GTTSAA was published in 2013, two transit sites have been granted planning permission in Gloucestershire, one at Morton Valence in Stroud District for six pitches and one at Minsterworth for eight pitches; 14 transit pitches in total. The suggested need arising from the GTTSAA has therefore been exceeded.* ~~In addition, the JCS authorities are pursuing a policy of 'temporary toleration' as opposed to publicly owned transit sites.~~<br><br>The nature of existing provision in Gloucestershire means that a very significant proportion of the needs arise in Tewkesbury Borough. However, ~~the government policy document 'Planning Policy for Traveller Sites (2012)~~ *PPTS* sets out that where there are special or strict planning constraints across an area, local planning authorities should consider working together through the 'Duty to Co-operate' to provide for traveller needs, in order to provide more flexibility in the identification of sites, including the preparation of joint development plans. Further to this, the assessment confirms issues with the ability to bring forward sites for traveller communities in urban areas for reasons such as limited land availability and site viability. Depending on the availability of deliverable sites, it may also be necessary to work with other Gloucestershire authorities to address needs arising from their communities.<br><br>~~In terms of the JCs, significant development will be coming forward through the Strategic Allocation and urban extensions and the need for affordable accommodation for all members of the community will~~ | Clarification on the position of transit sites within the JCS.<br><br>The JCS no longer requires a specific commitment for GTTS pitches on strategic allocations, but instead |

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| | | ~~need to be addressed through these developments. It may be possible for sites for traveller communities to be provided as part of well-masterplanned Strategic Allocations, as required at Policy SA1, and the potential for such provision will be fully considered through the planning process. Further non-strategic site allocations will be considered by each of the JCS authorities in district plans, in the context of locally set targets.~~<br><br>~~'Planning Policy for Traveller Sites' PTTS requires that local planning authorities provide a criteria against which potential site allocations will be assessed. It will also form the policy against which other speculative applications that may come forward should be assessed.~~ | affordable requirements will be met through Policy SD13.<br><br>Criteria based policy provided through Policy SD14. District plans may wish to development further detailed policy and guidance if required.. |
| PMM0077 | Delivery 4.14.8 & 9 | The purpose of Policy SD14 is to set out the overall numbers of pitches and plots required within the JCS area for gypsies, travellers and travelling showpeople, and to set out a criteria-based policy for use in the assessment of potential sites. ~~Policy SA1 provides detail with regard to site provision through the JCS.~~<br><br>In order to bring forward adequate numbers of sites for Gypsies, Travellers and Travelling Showpeople communities, it ~~will~~ *may* also be necessary for provision to come forward through smaller non-strategic sites~~, particularly during the first five years of the plan.~~ This will be ~~established~~ *examined* through the lower-level district plans. | |
| PMM0078 | **Policy SD15** Policy number 3 | Proposals for development at Strategic Allocations, and other development proposals *as appropriate* ~~at the discretion of the local planning authority~~, must be accompanied by a health impact assessment. | SD15 (3) Edited to wording agreed during the examination session on this policy to increase its readability and effectiveness |
| PMM0079 | Delivery After 4.15.8 | *Applications which may require health impact assessments should first be screened to determine whether* | Text added to clarify the need for screening for |

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>it is necessary for a full assessment to take place</td><td>Health Impact Assessments where required.</td></tr>
<tr><td>PMM0080</td><td>Part 5 Policy INF1 and INF 2 5.2.2 - 5.2.5</td><td>INF1 ~~and INF2~~ –TRANSPORT NETWORK<br><br>Background<br>The NPPF states ~~in Paragraph~~ 29 that ‘The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel’. The ONS data on commuting patterns collected from the Annual Population Survey (2010 and 2011) indicates a high proportion of people both living and working within the JCS area. This self-containment highlights the potential for short-distance trips to transfer where appropriate to non-car modes, such as public transport, walking or cycling – something which the NPPF considers~~, at Paragraph 17,~~ to be a core planning principle ~~,reiterated at part 4 of the document~~. Enabling the transfer to non-car modes requires a co-ordinated approach across several policy and delivery areas, and the JCS seeks to achieve this through its policies on design and infrastructure ~~(see, for example, criterion vii of Policy SD5).~~. This policy contributes to the delivery of the strategy’s ambitions and strategic objectives including:<br><br><table><tr><th>~~Ambition~~</th><th>~~Strategic Objective~~</th></tr><tr><td>~~A thriving economy~~</td><td>~~1)Building a strong and competitive urban economy~~<br>~~2)Ensuring vitality of town centres~~</td></tr><tr><td>~~A sustainable natural and built environment~~</td><td>~~4)Conserving and enhancing the environment~~<br>~~5)Delivery excellent design in new developments~~<br>~~6)Meeting the challenges of climate change~~</td></tr><tr><td>~~A healthy, safe and inclusive community~~</td><td>~~7)Promoting sustainable transport~~<br>~~9)promoting healthy communities~~</td></tr></table><br>The preparation and implementation of transport strategy is primarily a matter for the Local Transport</td><td>Section title changed to better reflect policy provisions.<br><br>Removal of specific NPPF references in line with the rest of the JCS.<br><br>Table deleted to not duplicate reference to objectives in policy and to bring in line with the rest of the JCS.<br><br>Clarification on the role of development plans in</td></tr>
</table>

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| | | *Plan* ~~policy and proposals are not primarily matters for the development plan (in this case the JCS and emerging district plans)~~. The role of the development plan is to reflect, support and enable the implementation of transport objectives through its land-use policies and proposals.<br><br>In the JCS area, the Local Highway Authority is Gloucestershire County Council. The County Council manages and maintains the local road network, supports non-commercial passenger transport services, and promotes safe and sustainable travel. The Local Transport Plan (LTP) is prepared by the County Council and sits alongside the JCS. In order to get a 'full picture' of transport policy and its implementation, the two documents need to be read together. *The LTP is the key strategy for the delivery of essential transport infrastructure to support the delivery of growth identified through the JCS.* The preparation of this and other relevant parts of the JCS are the result of co-operation between the planning authorities and the Local Highway Authority.<br><br>~~The~~ Highways England ~~Agency, an executive agency of the Department for Transport~~*, is a government company that is charged with operating, maintaining and improving* ~~manages and maintains~~ the strategic road network *in the area* including the M5, M50, A40, A46 and A417. ~~The Highways Agency also~~ *Highways England also* contributes to local transport policy formulation and implementation by engaging with the Local Highway Authority through the periodic LTP review process and other relevant consultations. Ongoing partnership working also happens through regular liaison and operation meetings. | developing the transport strategy.<br><br>Clarification on the role of the LTP.<br><br>Updated to provide information on the change from Highways Agency to Highways England. |
| PMM0081 | Policy INF1 and INF 2 | ~~**Policy INF1: Access to the Transport Network**~~<br><br>~~1. Developers should aim to provide safe and accessible connections to the transport network to enable travel choice for residents and commuters. All proposals must ensure that:~~<br>~~a. The development provides safe vehicular access to the highway network~~<br>~~b. Any increased level of car use derived from the development does not result in severe increases in congestion on the network. Severe increase in congestion in~~ | |

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| | | ~~this context relates to highway junctions no longer operating within their design capacity~~<br>~~c. Any severe increase in congestion likely to arise from development must be mitigated to ensure highway junctions operate within their design capacity, and~~<br>~~d. Connection should be provided where appropriate to existing walking, cycling and passenger transport networks and should be designed to enable and encourage maximum potential use~~<br><br>~~2. Where a significant amount of new trips is anticipated from a proposed development the local planning authority may require application to be accompanied by a Travel Plan that has full regard to the criteria set out in paragraph 35 of the National Planning policy Framework.~~<br><br>~~**This policy contributes towards achieving Objectives 1, 2, 3, 6, 7 and 9.**~~<br><br>~~**Policy INF2 – Safety and Efficiency of the Transport Network**~~<br><br>~~1. Developers will be required to assess the impact of proposals on the transport network to ensure that they will not detrimentally affect its safety or efficiency. All proposals will demonstrate the impact of prospective development on:~~<br>~~i. Congestion at network pinch-points~~<br>~~ii. Travel safety within the vicinity of the development, and~~<br>~~iii. Noise and/or atmospheric pollution within the vicinity of the development.~~<br><br>~~2. Planning permission will be granted only where the impact of development is not considered to be severe, or where severe impact is considered likely, can be mitigated to the satisfaction of the local planning authority in consultation with the Local Highway Authority.~~<br><br>~~**This policy contributes towards achieving Objectives 4, 5, 6, 7 and 9**~~ | Policy INF1 and INF2 have |

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| | | *Policy INF1: Transport Network*<br><br>*1. Developers should provide safe and accessible connections to the transport network to enable travel choice for residents and commuters. All proposals should ensure that:*<br><br>*a. Safe and efficient access to the highway network is provided for all transport modes*<br>*b. Connections are provided, where appropriate, to existing walking, cycling and passenger transport networks and should be designed to encourage maximum potential use*<br>*c. All opportunities are identified and taken, where appropriate, to extend and/or modify existing walking, cycling and public transport networks and links, to ensure that credible travel choices are provided by sustainable modes*<br><br>*2. Planning permission will be granted only where the impact of development is not considered to be severe. Where severe impacts that are attributable to the development are considered likely, including as a consequence of cumulative impacts, they must be mitigated to the satisfaction of the Local Planning Authority in consultation with the Highway Authorities and in line with the Local Transport Plan.*<br><br>*3. Developers will be required to assess the impact of proposals on the transport network through a Transport Assessment. The assessment will demonstrate the impact, including cumulative impacts, of the prospective development on:*<br><br>*a. Congestion on the transport network*<br>*b. Travel safety within the zone of influence of the development*<br>*c. Noise and/or atmospheric pollution within the zone of influence of the development*<br><br>*4. Where appropriate the local planning authority may require applications to be accompanied by a* | been amalgamated following discussions at examination that there was duplication between them.<br><br>(1b) recommended addition following engagement with Gloucestershire County Council<br><br>(1c) recommended addition following engagement with Stagecoach bus operator.<br><br>(2)Amalgamation of previous policy INF1 1.ii and INF2 2.<br><br>(3)Developed from Policy INF2 1. Specific reference to transport assessments and cumulative impacts of development.<br><br>(3a) Widening the definition to include the transport network as a whole which could be |

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| | | *Travel Plan that has full regard to the criteria set out in the NPPF.*<br><br>***This policy contributes towards achieving Objectives 1, 2, 3 4, 5, 6, 7 and 9.*** | affected.<br><br>(3b& 3c) Terminology changed from vicinity to zone of influence to clarify where reasonable impacts should be assessed.<br><br>(4) Developed from Policy INF1 2. Reworded to allow travel plans to be requested in a broader range of circumstances. |
| PMM0082 | Explanation 5.2.7 - 5.2.8 | The desired outcome from all development remains a safe and efficient transport network where people feel safe and they have a reasonable variety of travel choices. The degree of choice must be realistic in relation to the proposed development in terms of use, affordability and ongoing maintenance. Policy SD5 ~~Criterion vii 'Movement and connectivity'~~ sets out the approach to sustainable travel modes and choice in new development *in regards to masterplanning, design and layout.*<br><br>The need to mitigate the impact of car-based travel in respect of road congestion, health and atmospheric pollution is a key objective of the NPPF. It underpins the requirement in ~~Paragraph 32 of~~ the NPPF for development that generates significant amounts of movement to be supported by Transport Statements or Transport Assessments. Proposals should fully consider measures, where feasible, to encourage individuals to walk or cycle for appropriate short distance trips (less than three miles) or use passenger transport for longer distance journeys. The impact on passenger transport services needs to be considered to ensure site sufficient capacity exists on services and/or car-parking facilities at rail stations. | Clarify link between transport policy and SD5<br><br>Removal of specific policies in the NPPF to be consistent with the rest of the JCS.<br><br>Further explanation of the role of travel plans to support policy. |

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| | | *The local planning authority may require a site-wide travel plan to be submitted with proposals to address sustainable transport strategy for a development. Travel plans are a useful tool when considering how best to mitigate the impact of car-based transport and to promote a shift towards more sustainable modes. Travel plans will be expected to conform to the guidance set out in the NPPF and the PPG.* ~~A site-wide travel plan, as detailed in paragraphs 35 and 36 of the NPPF, is a useful tool when considering how this is best achieved and monitored, and the local planning authority may require one to be submitted with proposals.~~ *They should form long-term management strategies to put in place measures to actively manage the transport impacts of development and promote and encourage sustainable travel. This should take into account all journeys likely to result from a development. Travel plans will be expected to identify specific outcomes, targets and measures and set out clear future monitoring and management arrangements.* | Removal of specific policies in the NPPF to be consistent with the rest of the JCS. |
| PMM0083 | Delivery 5.2.11 | The County Council has provided a number of useful documents which provide advice for developers. These are all available through Gloucestershire County Council's website (www.gloucestershire.gov.uk) and are periodically updated and added to ensure they remain fit for purpose.<br><br>• ~~**Local Developer Guide 2013** – provides a brief overview for developers on the type of infrastructure considerations that should be taken into account when making a planning application~~<br><br>• **Local Transport Plan** ~~**2012-2026**~~ ***2015-2031*** – provides an overview of the strategic context of the transport network within the county, *setting out strategy, policies and investment priorities. The LTP is a living document which will be updated and amended to reflect changing policy at the national and local level. This would enable the LTP to be responsive to any significant transport infrastructure needs that may arise through* | Text on Local Developer Guide moved below LTP point. |

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| | | *the JCS plan period, including future reviews.*<br>• ***Local Developer Guide 2013*** *– provides a brief overview for developers on the type of infrastructure considerations that should be taken into account when making a planning application* | Further explanation of role of the LTP. |
| PMM0084 | **Policy INF3** 5.3.2 | The majority of flood risk in Gloucester City arises from the smaller river catchments. While the Severn is capable of coming out of its bank and flooding a large area, flood risk is reduced by the presence of defences. Nevertheless, the Severn may contribute to flooding as the effects of high flows in the smaller streams may be worsened by the elevated levels in the Severn, making it difficult for them to discharge. *The Environment Agency is working with Gloucester City Council, the County Council and landowners to secure improved flood defences around lower Westgate in Gloucester. This will need a co-ordinated approach to development particularly at key regeneration sites in the area if wider flood benefits are to be realised.* | To clarify ongoing flood defence work in Gloucester city |
| PMM0084a | Policy INF3 | *iii.* Requiring new development that could cause or exacerbate flooding to be subject to a flood risk assessment which conforms to national policy and incorporates the latest available *updates to* modelling and historic data and information and guidance contained in the authorities' Strategic Flood Risk Assessments and Supplementary Planning Documents, in order to demonstrate it will be safe, without increasing flood risk elsewhere | iii) Included to ensure that the flood risk information available to decision takers is as up to date as possible taking into account model updates. More detail is given in explanation text 5.3. |
| PMM0085 | Explanation 5.3.5 | The Environment Agency regularly updates the 'Flood Map for Planning' showing areas at high (1 in 100 year), medium (1 in 1,000 year) and low (less than 1 in 1,000 year) risk of flooding (these are Flood Zones 3, 2 and 1 respectively). To complement these maps, Gloucestershire County Council, the Lead Local Flood Authority *(LLFA),* prepared a SFRA Level 1 for the county (September 2008). This assessed all | |

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| | | forms of flood risk: fluvial (rivers), tidal (sea), surface water, groundwater, sewers and impounded water bodies (reservoirs and canals), in the context of the situation at the time and taking into account the likely impacts of climate change in the future. Gloucestershire County Council also produces Surface Water Management Plans which seek to identify areas more vulnerable to surface water flooding and indicate measures to mitigate this, recognising that it is not economically viable to eliminate flooding altogether. | |
| PMM0085a | After 5.3.6 | *To ensure that flood information is up to date when taking planning decisions about flood risk, planning allocations will be required to ensure that the modelling and flood flows used to justify the flood zones set out in any application take account of updates and changes to the models used. Particular regard should be had to changes and updates to models relating to rainfall predictions and climate change data.* | Included to ensure that the flood risk information available to decision takers is as up to date as possible taking into account model updates. Relevant Policy is set out in 2 (iii) |
| PMM0086 | 5.3.7<br>Bullet points 4 and 5 | • Careful site design, including reconfiguring ground levels or site access points, culvert improvements, channel restoration, the use of planting, and existing woods and trees to manage flood risk and incorporating SuDS. Suitable SuDS solutions will vary according to location, for example under-ground water storage tanks may not necessarily be suitable or desirable. Developers will need to think creatively about the most sustainable SuDS solutions, taking into account principles of good design and the effect of the scheme on the development as a whole and its surroundings. *For more information see the LLFA guidance on SuDS*<br>• *Where a Surface Water Management Plan shows the presence of pluvial flooding, the development will need to compensate for the pluvial flood volume lost by providing additional flow and storage capacity within the developments surface water drainage system and attenuation storage.*<br>• *Ensuring that all flood management designs which form part of planning applications are fully implementable and free from legal or design impediments which are likely to affect their usefulness.*<br>• Considering *and acting on* the cumulative impact of existing and new development*, for example:* | Additional information added as further explanation of policy 2 (iv).<br><br>Explanation text added that flood risk management solutions should be demonstrated to be realistic and implementable during the planning process.<br><br>Included to give an example of considering the impacts of new development infrastructure on upstream |

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| | | *Ensuring that works to raise the highway levels where the highway is subject to fluvial flooding will only be permitted if provision is made at the same time to provide additional flood flow capacity under the highway to ensure no adverse impacts upstream.* | flood risk |
| PMM0087 | Delivery After 5.3.15 | *Developers should follow guidance from the LLFA when considering SuDS schemes. This can be found in its November 2015 publication 'Gloucestershire SuDS design and maintenance guide'* | Signposting to latest guidance on SuDS. |
| PMM0088 | Policy INF4 Explanation 5.4.6 & 7 | The JCS authorities have produced a Green Infrastructure Strategy based on an assessment of the area's environmental assets. The strategy identifies two key regional/sub-regional green infrastructure assets in the area: The Cotswolds AONB to the east and the River Severn and its washlands to the west. *The River Severn area has been promoted by the JCS authorities as a potential Regional Park. This would recognise the special habitat qualities of the area as well as its importance for the quiet enjoyment of the countryside.* Below this, at an intermediate level, the strategy seeks to link these two assets and the main urban areas through a number of green corridors, most of which are watercourses. At a local level, the strategy identifies watercourse corridors as key green infrastructure assets in the urban areas. Ideally, all green infrastructure should link with these areas and form a co-ordinated network. The Green Infrastructure Strategy therefore includes a vision that everyone living in the JCS area can, within 300 metres (five minutes' walk-time), access a green infrastructure corridor or asset. From there, people will be able to travel through interconnected and multi-functional green spaces to ultimately emerge into the strategic assets of The Cotswolds AONB or the Severn and its washlands.<br><br>Enhancement of green infrastructure and ecological networks will require existing assets to be retained (where appropriate), improved and better managed, and new features to be created. *It is recognised that the growth to be delivered through the JCS may increase demands on green spaces through increased recreational use. This will require careful management, particularly for ecologically sensitive sites.* This could include requiring developer contributions for such provision (for example, a contribution towards the management of the Cotswolds Beechwoods Special Area of Conservation [SAC]). *The JCS authorities will work together with key stakeholders, such as Natural England and the Environmental* | Signposting the potential regional park<br><br>Text added to reflect submissions by Natural |

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| | | *Agency, to develop management and mitigation packages for important green and ecological networks and to discuss how future development can contribute to this.* Policy on developer contributions is set out in Policy INF7. New green infrastructure should combine with established green spaces to thread through and surround the built environment, connecting urban areas and villages with the natural and agricultural areas beyond. This will require delivery of both large- and small-scale interventions at local, intermediate and strategic/landscape level. Development at Strategic Allocations will need to deliver connectivity through the site, linking urban areas with the wider rural hinterland. | England. |
| PMM0089 | Delivery After 5.4.12 | *The indicative site layout for the strategic allocation at North West Cheltenham indicates where a green buffer should be retained near Swindon Village when master planning this area in accordance with Policy SA1. The Cheltenham Plan will allocate the specific boundaries of Local Green Space in this area, along with any other Local Green Space to be allocated in the Borough.* | Text added to reference the "Swindon Village Green Buffer/ Indicative Local Green Space area for allocation in the Cheltenham Plan" as referenced in Policy SA1 and on the indicative site layout for this allocation. |
| PMM0090 | Policy INF5 Delivery 5.5.6 | Delivery will primarily be through the development management process. Through preparation and implementation of the JCS IDP, the three JCS councils, Parish Councils and Neighbourhood Forums will continue to work collaboratively with infrastructure providers, developers and partnership groups to ensure that social and community infrastructure needs of existing and future communities are met. *Existing social sustainability initiatives including the partnership between Cheltenham Borough Homes, the Barnwood Trust, Bromford and Sovereign, as well as the Asset Based Community Development (ABCD) initiative at Gloucester city, will be taken forward by the JCS authorities, including through the district level plans.* | Providing an update on ongoing social sustainability initiatives in the JCS area |
| PMM0091 | Policy INF6 Background | Commercial renewable energy installations tend to be large as they have to capture the available natural energy from the environment around them and, as such, they have tended to be controversial. ~~Wind~~ | |

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| | 5.6.3 – 5.6.5 | ~~farm development in particular has been perceived as visually intrusive, although generally wind generation is supported by the vast majority of the population 9NOP DTI commissioned survey 2006).~~<br><br>The drive for renewable/low carbon sources of energy is not just about reducing greenhouse gas emissions; it also concerns a more secure energy market, long- term cheaper energy costs, and importantly for the JCS, retaining money within the local economy. Installation of plant can also support local job creation.<br><br>~~This policy~~ *Policy INF6* applies to proposals concerning ~~all~~ renewable energy or low carbon energy-generating technologies, including ~~wind turbines,~~ biomass generators, anaerobic digestion plants and other energy from waste technologies, hydropower turbines, and ground-mounted solar photovoltaic arrays. *The one exception to this is with wind turbines. Locations for these, unless government guidance changes to the contrary, will be allocated through district level plans or neighbourhood plans where appropriate.* | Potential wind farm development will now be addressed through District –level plans in accordance with national guidance. |
| PMM0092<br>NOT USED | | | |
| PMM0093 | INF6<br>Policy<br>Number 1<br>point iii. | Policy INF6: Renewable Energy/Low Carbon Energy Development<br><br>1. Proposals for the generation of energy from renewable resources, or low carbon energy development *(with the exception of wind turbines),* will be supported, provided the wider environmental, social or economic benefits of the installation would not be outweighed by a significant adverse impact on the local environment, taking into account the following factors:<br><br>iii. Any unacceptable adverse impacts on users and residents of the local area, including emissions, noise, odour and visual amenity~~, including shadow flicker~~. | Potential wind farm development will now be addressed through District –level plans in accordance with national guidance.<br><br>Shadow flicker relates |

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| | | | primarily to wind turbines. |
| PMM0094 | Explanation 5.6.8 | The NPPF suggests that local planning authorities consider identifying suitable areas for renewable energy. Gloucestershire County Council commissioned ENTEC to undertake a study into renewable energy capacity across the county in 2010. ~~It established that 10% on-site energy generation was feasible in most development scenarios, which has been set out in Policy SD4.~~ It ~~also~~ considered renewable/low carbon development at a commercial level and identified wind and biomass as potential resources for the JCS area. Furthermore, it identified that there were no significant grid constraints within the JCS area, and that electric and gas grid availability was generally good. The ENTEC study does not provide sufficiently strong evidence on its own to enable the JCS authorities to identify suitable areas for developing renewable energy; however, district plans may seek to identify these based on more detailed local evidence, or may seek to provide further guidance on the issue. | See changes to SD4 which removes this target in accordance with national guidance |
| PMM0095 | **Policy INF7** Background 5.7.1 | Government says that *'Infrastructure is the foundation upon which our economy is built. The government remains determined to deliver better infrastructure in the UK to grow the economy and improve opportunities for people across the country.' (National Infrastructure Delivery Plan 2016–2021 Executive Summary.)* ~~'The quality of a nation's infrastructure is one of the foundations of its rate of growth and the living standards of its people. That is why the government has put long-term investment in roads, railways, energy, telecommunications and flood defences at the heart of its growth plan' (National Infrastructure Plan 2013, page 3)~~ This standpoint is mirrored in the NPPF. There is little further to add in emphasising the importance of infrastructure in all its forms to the community as a whole. | Updated to the National Infrastructure Plan wording |
| PMM0096 | Policy | **Policy INF7: Infrastructure Delivery**<br>1. Where ~~need is~~ *infrastructure requirements are* generated as a result of individual site proposals and/or ~~as a consequence of~~ *having regard to* cumulative impact, new development will be served and supported by adequate and appropriate on- and/or off-site infrastructure and services. In identifying infrastructure requirements, development proposals will also demonstrate that full regard has *been* given, where appropriate, to implementing the requirements of the Joint Core Strategy Infrastructure Delivery Plan. | (1) Wording change to assist readability and increase plan flexibility<br><br>Changes to wording to reflect national guidance |

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| | | 2. Where need for additional infrastructure and services and/or impacts on existing infrastructure and services is expected to arise, the local planning authority will seek to secure appropriate ~~and proportionate~~ infrastructure ~~provision in respect of~~ *which is necessary, directly related, and fairly and reasonably related to the scale and kind of the development proposal, including*:<br><br>i. ~~Affordable housing~~ *Broadband infrastructure*<br>ii. Climate change mitigation/adaptation<br>iii. Community *and cultural* facilities *and initiatives*<br>iv. Early Years and Education<br>v. Health and well-being facilities<br>vi. The highway network, traffic management, sustainable transport and disabled people's access<br>vii. Protection of cultural and heritage assets and the potential for their enhancement<br>viii. Protection of environmental assets and the potential for their enhancement<br>ix. Provision of Green Infrastructure including open space<br>x. Public realm, and<br>xi. Safety and security including emergency services<br>xii. Flood risk management infrastructure<br><br>This list *of potential infrastructure items* is neither exhaustive, *sequential* nor are its elements mutually exclusive. | (i) Affordable housing provision is dealt with in Policy SD13. Broadband Infrastructure links in with delivery of Strategic Objective 1 and reflects examination hearings on the vison and objectives. (iii) Community and Cultural facilities and initiatives were introduced to the policy to deliver Objective 8 and changes to Policy INF5 Social and Community Infrastructure allowing for the provision of Community Building Projects. The list of infrastructure items should not be considered to be sequential or in priority order. |
| PMM0097 | Explanation 5.7.4 | It follows, from the preceding paragraphs and from the background to this policy, that the provision of infrastructure is a matter of critical importance in the consideration and determination of applications for planning permission. Existing infrastructure may have sufficient capacity to absorb some if not all the envisaged impact of new development. However, in many instances this may not be the case. Furthermore, where additional provision is needed, the JCS authorities acknowledge that it may not be practical and/or economically viable to require a developer to make provision for all required infrastructure identified with their proposal at the outset. Consequently a phased approach to | |

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| | | provision and maintenance, *that is* fully justified within the *planning* application, may be acceptable. Nevertheless, if sufficient provision cannot be adequately demonstrated both in terms of infrastructure items and necessary maintenance, planning permission is likely to be refused. For the avoidance of doubt, references to 'new development' in*clude development of all scales and types.* ~~Policy INF7 are not necessarily subject to considerations of scale.~~ | Altered to improve clarity |
| PMM0098 | Delivery 5.7.5 | This policy will primarily be delivered through the development management process. Prospective developers should begin identification of infrastructure requirements at an early stage in the formulation of a proposal, seeking advice and guidance from infrastructure providers, local authorities and local communities where necessary. *This includes the Gloucestershire County Council 'Local Developer Guide: Infrastructure & Services with New Development' (adopted February 2013).* There are several policies elsewhere in the JCS that directly or indirectly relate to the provision of infrastructure. ~~including all those in park 5 Infrastructure Policies., Prospective~~ Developers should read the JCS as a whole. | Signposting readers to the Gloucestershire Document<br><br>Altered to improve clarity |
| PMM0099 | **Policy INF8** Policy | **Policy INF8: Developer Contributions**<br>*1.* Arrangements for direct implementation or financial contributions towards the provision of infrastructure and services required as a consequence of development, including its wider cumulative impact, and provision where appropriate for its maintenance, will be negotiated with developers before the grant of planning permission. *Financial contributions will be sought through the S106 and CIL mechanisms as appropriate.*<br><br>*2.* Where, having regard to the on- and/or off-site provision of infrastructure, there is concern relating to the viability of the development, an independent viability assessment, funded by the developer and in proportion with the scale, nature and/or context of the proposal, will be required to accompany planning ~~applications. The submitted assessment and its methodology may be~~ | Policy INF 8 "Financial contributions…" to aid clarity and make clear S106 or CIL mechanisms could be used.<br><br>Publication of viability |

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| | | ~~independently appraised.~~ *applications. Viability assessments will be undertaken in accordance with an agreed methodology and published in full prior to determination for all non-policy compliant schemes Where necessary the JCS authorities will arrange for them to be independently appraised at the expense of the applicant.* | assessments will be required for non-compliant schemes in line with best practice and for reasons of transparency. Publication of such assessments will allow communities to assess the robustness of the appraisal and empower decision makers. |
| PMM0100 | After 5.8.5 | *Publication of viability assessments will be required for non-compliant schemes in line with best practice and for reasons of transparency. Publication of such assessments will allow communities to assess the robustness of the appraisal and empower decision makers.* | As above, explanatory text related to the need to publish viability assessments for non policy compliant schemes. |
| PMM0101 | **Policy SA1** Background 6.1.1.- 6.1.3 | Strategic Policies SP1 and SP2 in Part 3 of this plan set out the scale and distribution of development to be delivered across the JCS area in the period to 2031. The identification and delivery of eight Strategic Allocations on the edges of existing urban areas is an important part of the delivery of the JCS as a whole.<br><br>Policy SA1 formally designates these eight Strategic Allocations and focuses on the need to deliver comprehensive development in each of these areas. Comprehensive development is critical in ensuring that large-scale proposals use land efficiently, maximise the efficient and effective delivery of infrastructure over the life of the development, and ensure the protection and enhancement of natural resources.<br><br>The Strategic Allocations Report details the process by which the approximate capacity of the sites in Table SA1 was calculated, *except for allocations at Twigworth, Winnycroft and West Cheltenham. The* | |

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| | | *capacity of these sites has been informed through the JCS evidence base as it progressed after submission* . The approach took into account extensive work carried out over a number of years on the developable areas within these allocation boundaries. Once these areas were identified, the yield of housing predicted to arise from the site was reduced to take into account infrastructure and green space requirements. These reductions in yield are in addition to reductions made to allow for areas already identified solely for green infrastructure within the allocation boundaries. Where available, detailed work from prospective developers was assessed and considered along with other available technical reports to ensure that the numbers in Table SA1 are as accurate and achievable as possible. | Updated for new strategic allocations not previously covered by the Strategic Allocations report. |
| PMM0102 | Policy | **Policy SA1: Strategic Allocations Policy**<br><br>1. New development will be provided within Strategic Allocations in order to deliver the scale and distribution of development set out in Policies SP1 and SP2.<br><br>2. The Strategic Allocations are listed in Table SA1 and delineated on Plans A1-A11~~9~~ below and are marked on the *proposals map* ~~proposed submission policies map~~. The red lines on Plans A1–A11~~9~~ (not including *A2, A6,* A7 *and A8 which have been removed from the JCS*) mark the boundaries of the allocations and are separately and collectively part of this policy.<br><br>3. *Each Strategic Allocation is supported by site specific policies A1-A11 (not including A2, A6, A7 and A8) which have been removed from the JCS) below to provide further detailed guidance on the development of these sites. These site policies also form part of this policy.*<br><br>4. *Development proposals should enable a comprehensive scheme to be delivered across the developable area within each Strategic Allocation. Developers must ensure that the sites provide an appropriate scale and mix of uses, in suitable locations, to create sustainable developments that support and complement the role of existing settlements and communities.*<br><br>5. Proposals must be accompanied by a comprehensive masterplan for the *entire* Strategic Allocation. This should demonstrate how new development will integrate with and complement its surroundings in an appropriate manner, in accordance with Policy SD5. | (2) Changes to reflect new and removed sites and numbering.<br><br>(3) Addition to policy to link to new individual site policies which are parts of the whole SA1 policy.<br><br>(4) Policy point altered to remove infrastructure which is dealt with in more detail under a specific policy point.<br><br>(5) Clarification to make clear that policy points apply to the whole red line boundary of a Strategic Allocation.<br><br>(former point 4) |

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| | | ~~4. Proposals will be required to demonstrate how the provision of new gypsy, traveller and travelling Showpeople sites will be incorporated into development proposals for Strategic Allocations.~~<br><br>6. Strategic Allocations ~~which include residential development~~ should seek in all cases to retain and enhance areas of local green space within the boundary of the allocation, which meet the criteria in ~~the~~ NPPF *and relevant national guidance* ~~Paragraph 77~~ whilst delivering the scale and distribution of development required by this policy. This is in addition to the requirements of Policy INF4.<br><br>*7.* ~~Development proposals should enable a comprehensive scheme to be delivered across the developable area within each Strategic Allocation.~~ *Infrastructure should be planned and provided comprehensively across the site taking into account of the needs of the whole Strategic Allocation. Developers must engage with the relevant infrastructure regulators and providers to ensure the implementation of the Infrastructure Delivery Plan and the provision of any other necessary infrastructure in accordance with Policies INF7 and INF8.* ~~Developers must engage with the relevant infrastructure regulators and providers to ensure implementation of the Infrastructure Delivery Plan or provision of other necessary infrastructure, as appropriate, and in accordance with Policies INF7 and INF8. Developers must ensure that Strategic Allocations provide an appropriate scale and mix of uses, in suitable locations, to create sustainable urban extensions that support and complement the role of existing settlements and communities.~~<br><br>*8. The transport strategy to support the delivery of Strategic Allocations should align with and where appropriate contribute to the wider transport strategy contained within the Local Transport Plan, including priority transport corridors and junctions. The development of Strategic Allocations must encourage the use of walking, cycling and the use of public transport and ensure that transport demands arising from the development can be effectively mitigated in accordance with Policy INF1.*<br>**This policy contributes towards achieving Objectives 1, 2, 4, 6, 7, 8 and 9** | Requirement for gypsy and traveller provision removed and dealt with under Policy SD14.<br><br>(6) Removed restriction of only applying to Strategic Allocations which include residential development and reworded for clarity.<br><br>(7) Reinforcing the need for a comprehensive approach to infrastructure provision across Strategic Allocations.<br><br>(8) To emphasise the need for Strategic Allocations to address transport impact and sustainable transport modes. |
| PMM0103 | Table SA 1 | **Table SA 1** | Table modified to reflect the removal and inclusion of Strategic Allocations and |

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| | | | to update with latest capacity figures. |

| | Indicative Housing Site Total | Indicative Housing to be delivered up to 2031 | Hectares of Employment Land to be delivered up to 2031 |
|---|---|---|---|
| A1 Innsworth | *1300* ~~1250~~ | *1300* ~~1250~~ | 9.1 |
| *A1a Twigworth* | *995* | *995* | N/A |
| ~~A2 North Churchdown~~ | ~~532~~ | ~~532~~ | ~~N/A~~ |
| A3 South Churchdown | *1100* ~~868~~ | *1100* ~~868~~ | 17.4 |
| A4 North Brockworth | 1500 | 1500 | *3* ~~N/A~~ |
| A5 North West Cheltenham | *4285* ~~4785~~ | *4285* ~~4785~~ | 23.4 |
| ~~A6 South Cheltenham Leckhampton~~ | ~~1124~~ | ~~1124~~ | ~~N/A~~ |
| ~~A8 MoD Site at Ashchurch~~ | ~~2726 (*2125 up to 2031)~~ | ~~2125~~ | ~~20 *~~<br>~~*(this is replacement of existing use)~~ |
| A9 Ashchurch | N/A | N/A | 14.3 |
| *A10 Winneycroft* | *620* | *620* | *N/A* |

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>A11 West Cheltenham</td><td>1100</td><td>1100</td><td>45</td></tr>
<tr><td>Total</td><td>~~13,993~~ 10,900</td><td>~~12,284~~ 10,900</td><td>~~64.2~~ 112.2</td></tr>
</table>
</td><td></td></tr>
<tr><td>PMM0104</td><td>6.1.4</td><td>Proposals for development at Strategic Allocations must have regard to all relevant planning policies in the plan as well as Policy SA1, including site specific policies A1-A11. ~~The JCS identifies a number of specific requirements for Strategic Allocations and other major developments, which include the following :~~
<table>
<tr><th>~~Policy~~</th><th>~~Requirement~~</th></tr>
<tr><td>~~SD3~~</td><td>~~The provision of new local centres of an appropriate scale to provide for the everyday needs of new communities.~~</td></tr>
<tr><td>~~SD4~~</td><td>~~Major planning applications must be accompanied by a waste minimisation statement and an Energy Statement.~~</td></tr>
<tr><td>~~SD5~~</td><td>~~Policy SD5 sets out design requirements including masterplanning. Masterplans are required for all Strategic Allocations by Policy SA1.~~</td></tr>
<tr><td>~~SD7~~</td><td>~~Planning applications will be supported by a Landscape and Visual Impact Assessment where, at the discretion of the local planning authority, one is required.~~</td></tr>
<tr><td>~~SD9~~</td><td>~~Development proposals at Strategic Allocations must have regard to the findings and recommendations of the JCS Historic Environment Assessment (or any subsequent revision).~~</td></tr>
<tr><td>~~SD14~~</td><td>~~Policy SD14 sets criteria for proposals for new Gypsy, Traveller and Travelling Showpeople sites. Policy SA1 requires proposals at Strategic Allocations to consider provision of these sites at these locations.~~</td></tr>
</table>
</td><td>Earlier versions of the JCS did not include site specific policies for each strategic allocation. This table was intended to re-inforce the most relevant parts of the plan for strategic allocation purposes, but has been superseded by these policies. The plan must be read and applied as a whole in each case.</td></tr>
</table>

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| | | ~~SD15~~ ~~Proposals for development at Strategic Allocations must be accompanied by a health impact assessment.~~<br>~~INF3~~ ~~The cumulative impact of the proposed development on flood risk in relation to existing settlements, communities or allocated sites must be assessed and effectively mitigated.~~<br>~~INF4~~ ~~Development at Strategic Allocations will be required to deliver connectivity through the site linking urban areas with the wider rural hinterland.~~ | |
| PMM0105 | Strategic Allocations Information | **Strategic Allocations** ***Policies & Maps*** ~~**Information**~~<br><br>~~Red line plans and descriptions~~<br><br>The red lines on each of the Strategic Allocations plans show the policy allocation area, and are drawn to follow identifiable boundaries such as roads and watercourses wherever available. Areas of land and buildings which may not be suitable or available for *development or* redevelopment are included within these boundaries. However, site allocations work has indicated that a development of the scale set out in Table SA1 will be achievable within these locations.<br><br>*Proposals should also take into account the indicative site layouts presented for each allocation as part of this document, integrating key elements into site masterplanning where practical.*<br><br>Full regard must be given to the requirements of the NPPF and the development plans of each of the three councils when assessing development options for these locations. ~~Proposals should take account of the indicative site layouts prepared as part of this document and ensure that key elements are wherever possible integrated into masterplanning.~~ *Furthermore, in order to ensure the sustainable development of the allocations, a site specific policy has been prepared which sets out the key principles and* | Reworded to improve clarity and emphasise the introduction of site specific policies. |

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| | | *infrastructure requirements.* | |
| PMM0106 | Plan A1 Innsworth | ***POLICY A1 - Innsworth & Twigworth***<br><br>*The Strategic Allocation identified at Innsworth & Twigworth (as shown on Proposals Map Plan A1) will be expected to deliver:*<br><br>*i. Approximately 2,295 new homes*<br>*ii. Approximately 9 hectares of employment generating land*<br>*iii. A local centre including the provision of an appropriate scale of retail, healthcare and community facilities to meet the needs of the new community*<br>*iv. New primary and secondary education schools and facilities*<br>*v. A green infrastructure network of approximately 100 hectares, corresponding with flood zones 2 and 3.*<br>*vi. Protection to key biodiversity assets, including a new nature reserve with the green infrastructure area to support the restoration of the SSSI and improve the ecology of the area.*<br>*vii. Adequate flood risk management across the site and ensure that all vulnerable development is located wholly within flood zone 1. This includes measures to reduce flood risk downstream through increasing storage capacity.*<br>*viii. Flood risk management will be a critical part of master planning the site in linking the Innsworth and Twigworth areas, avoiding overland flow routes and addressing surface water flooding. Detailed flood risk assessments must utilise the latest flood risk modelling information for the whole site and any other areas impacted by the development in terms of flood risk.*<br>*ix. A layout and form of development that respects the landscape character as well as the character and setting of heritage assets and the historic landscape.*<br>*x. A layout and form that integrates, where appropriate, important hedgerows within the development.*<br>*xi. A layout and form that reduces the impact of electricity pylons and high voltage lines; with the siting of residential development being a particular consideration.*<br>*xii. Primary vehicle accesses from A38, Innsworth Lane and explore the potential for a new main* | Each Strategic Allocation has been given a site specific policy to covered detailed issues to be considered in bringing forward development. These delivery issues are based the JCS evidence base and is what is considered necessary to enable sustainable development. |

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| | | *junction onto the A40 to the south of the site.*<br>*xiii. The potential for a highway link through both the Innsworth and Twigworth sites linking the A38 and A40.*<br>*xiv. Measures necessary to mitigate the traffic impact of the site, including the use of travel plans to encourage the use of more sustainable transport modes.*<br>*xv. High quality public transport facilities and connections within and adjacent to the site*<br>*xvi. Safe, easy and convenient pedestrian and cycle links within the site and to key centres, providing segregated links where practical.* | |
| PMM0107 | Plan A1 Innsworth | **Plan A1 – Innsworth *& Twigworth***<br><br>This Strategic Allocation lies to the north of Gloucester and is bounded by Innsworth Lane and Innsworth Technology Park to the south, open countryside to the west, *Down Hatherley Lane* ~~the Hatherley Brook and its associated floodplain~~ to the north, and Frogfurlong Lane and Imjin Barracks to the east. The residential settlement of Innsworth lies to the south of the site *and Twigworth and Down Hatherley to the north*. *The Hatherley Brook and its associated floodplain run through the centre of the site which also includes* ~~A~~*a* Site of Special Scientific Interest. ~~is situated within the Strategic Allocation to the north west of the site.~~ | Site description amended to include reference to the Twigworth site. |
| PMM0108 | Plan A2 North Churchdown | ~~**Plan A2 – North Churchdown**~~<br><br>~~This Strategic Allocation lies to the north of Churchdown and is bounded by the A40 Golden Valley to the south, Parton Road and residential development to the south west, the B4063 to the west, and Normans Brook and the Gloucestershire Airport to the north east. The site is located to the north of the built-up area of Churchdown village.~~ | Site removed as a strategic allocation. |
| PMM0109 | Plan A3 South Churchdown | ***POLICY A3 - South Churchdown***<br><br>*The Strategic Allocation identified at South Churchdown (as shown on Proposals Map Plan A3) will be expected to deliver:*<br><br>*i. Approximately 1,100 new homes.*<br>*ii. Approximately 17 hectares of employment generating land.* | Each Strategic Allocation has been given a site specific policy to covered detailed issues to be considered in bringing forward development. These delivery issues are |

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

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| PMM0110 | Plan A4 – North Brockworth | ***POLICY A4 - North Brockworth***<br><br>*The Strategic Allocation identified at North Brockworth (as shown on Proposals Map Plan A4) will be expected to deliver:*<br><br>*i. Approximately 1,500 new homes.*<br>*ii. Approximately 3 hectares of employment generating land.*<br>*iii. Provision of an appropriate scale of retail, healthcare and community facilities to meet the needs of the new community.*<br>*iv. New primary and secondary education schools and facilities*<br>*v. A green infrastructure network of approximately 27 hectares including provision across the A46 and along Court Road towards Churchdown and along Horsbere Brook.*<br>*vi. The retention of the small traditional orchard to the east of the allocation.*<br>*vii. A layout and form of development that respects the character and setting of the heritage asset at Brockworth Court and integrates, where appropriate, historically important hedgerows within the development.*<br>*viii. Adequate flood risk management across the site and ensure that all vulnerable development is located wholly within flood zone 1.*<br>*ix. Protection to key biodiversity assets, including facilitating the active management of Horsbere Brook.*<br>*x. Primary vehicle accesses from Delta Way, Valiant Way and Court Road.*<br>*xi. Measures necessary to mitigate the traffic impact of the site, including the use of travel plans to encourage the use of more sustainable transport modes.*<br>*xii. High quality public transport facilities and connections within and adjacent to the site*<br>*xiii. Safe, easy and convenient pedestrian and cycle links within the site and to key centres, providing segregated links where practical. Particular consideration should be given to the upgrading of the pedestrian and cycle crossing on Valiant Way between residential and employment areas.* | Each Strategic Allocation has been given a site specific policy to covered detailed issues to be considered in bringing forward development. These delivery issues are based the JCS evidence base and is what is considered necessary to enable sustainable development. |
| PMM0111 | Plan A5 North West Cheltenham | ***POLICY A5 - NORTH WEST CHELTENHAM***<br><br>*The Strategic Allocation identified at North West Cheltenham (as shown on Proposals Map Plan A5) will* | Each Strategic Allocation has been given a site specific policy to covered |

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| | | *be expected to deliver:*<br><br>*i. Approximately 4,285 new homes*<br>*ii. Approximately 23 hectares of employment generating land, including a 10 hectare B-class office park*<br>*iii. Local centre(s) including the provision of an appropriate scale of retail, healthcare and community facilities to meet the needs of the new community,*<br>*iv. New primary and secondary education schools and facilities*<br>*v. A green infrastructure network of approximately 100 hectares which will conserve the River Swilgate and Hyde Brook corridors, protecting important trees and hedgerows where appropriate.*<br>*vi. Protection to key biodiversity assets including through the development of a Biodiversity Management Plan.*<br>*vii. Adequate flood risk management across the site and ensure that all vulnerable development is located wholly within flood zone 1.*<br>*viii. A layout and form of development that respects the landscape character and separation of the villages of Brockhampton, Elmstone Hardwicke, Swindon and Uckington.*<br>*ix. A layout and form that respects the character and setting of heritage assets that may be affected by development.*<br>*x. A layout and form that respects area of high landscape character and visual sensitivity, including key views into the site from the surrounding key visual and landscape receptors*<br>*xi. Primary vehicle accesses from the A4019 Tewkesbury Road, secondary access from Runnings Road/Manor Road, and public transport only access to Swindon village via Quat Goose Lane.*<br>*xii. Measures necessary to mitigate the traffic impact of the site, including the use of travel plans to encourage the use of more sustainable transport modes.*<br>*xiii. High quality public transport facilities and connections within and adjacent to the site, including a multi-use transport hub with circa 350 parking spaces.*<br>*xiv. Safe, easy and convenient pedestrian and cycle links within the site and to key centres, providing segregated links where practical.*<br>*xv. Take into account of the indicative Local Green Spaces identified on the Proposals Map with consideration of the special features of that area which make it suitable for this designation.* | detailed issues to be considered in bringing forward development. These delivery issues are based the JCS evidence base and is what is considered necessary to enable sustainable development. |

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| PMM0112 | Plan A6 South Cheltenham Leckhampton | ~~**Plan A6 – South Cheltenham – Leckhampton**~~<br><br>~~The Strategic Allocation area is located to the south of Cheltenham, south of Shurdington Road and north of Church Road, on the lower slopes of Leckhampton Hill, adjoining the Cotswolds AONB. The land is divided by Hatherley Brook and crossed diagonally from north-west to south-east by Kidnappers Lane. The area to the north of the Strategic Allocation contains a mixture of paddocks, allotments, small holdings, nurseries and some dwellings. It is divided by hedges with few specimen trees. This Strategic Allocation is of local historical importance to Leckhampton, which has long been an area of settlement. The Church, The Rectory, Field Cottage and Moat Cottage are all listed buildings, and the moated site is an ancient monument.~~ | Site removed as a strategic allocation. |
| PMM0113 | Plan A7 South Cheltenham Up Hatherley Way | ~~**Plan A7 – South Cheltenham – Up Hatherley Way**~~<br>~~Removed.~~ | Site removed as a strategic allocation at Pre-Submission stage. |
| PMM0114 | Plan A8 MoD Site at Ashchurch | ~~**Plan A8 – MOD Site at Ashcurch**~~<br><br>~~Land at this location covers a large area which extends from the A46 northwards to Aston Carrant Lane. The mainline railway provides the western boundary for this Strategic Allocation. Most of the site is previously developed land, which comprises an army camp. It also has a railway spur which extends into the site from the south west. The northern part of the allocation is greenfield land which is currently largely agricultural land. The residential area of Ashchurch is situated to the west of the site, and there is open countryside to the north, east and south of the site.~~ | Site removed as a strategic allocation. |
| PMM0115 | Plan A9 Ashchurch | ***POLICY A9 - Ashchurch***<br><br>*The Strategic Allocation identified at Ashchurch (as shown on Proposals Map Plan A9) will be expected to deliver:*<br><br>*i. Approximately 14 hectares of employment generating land.*<br>*ii. A green infrastructure network of approximately 5 hectares including a green corridor along the route of the Tirle Brook and a woodland belt at the southern boundary of the site to minimise harm* | Each Strategic Allocation has been given a site specific policy to covered detailed issues to be considered in bringing forward development. These delivery issues are based the JCS evidence |

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| | | *to views from Oxenton Hill.*<br>*iii. Adequate flood risk management across the site and ensure that all vulnerable development is located wholly within flood zone 1.*<br>*iv. Primary vehicle access from the A46 and a secondary access from Fiddington Lane.*<br>*v. Measures necessary to mitigate the traffic impact of the site, including the use of travel plans to encourage the use of more sustainable transport modes. This shall include consideration of the operation of the Strategic Road Network.*<br>*vi. Development that does not prejudice future highway improvements to the A46. This may include requirements to safeguarded sufficient land to allow for the delivery of future highway infrastructure improvements around the A46 and M5 Junction 9.*<br>*vii. High quality public transport facilities and connections within and adjacent to the site. This may include measures that will help facilitate an enhanced rail passenger service from Ashchurch for Tewkesbury station and bus advantage measures long the A438/A46 corridor where practical.*<br>*viii. Safe, easy and convenient pedestrian and cycle links within the site and to key centres and the railway station, providing segregated links where practical.* | base and is what is considered necessary to enable sustainable development |
| PMM0116 | Strategic Allocations Information | ***POLICY A10 - Winneycroft***<br><br>*The Strategic Allocation identified at Winneycroft (as shown on Proposals Map Plan A10) will be expected to deliver:*<br><br>*i. Approximately 620 new homes*<br>*ii. A comprehensive green infrastructure network will be provided on site, including the provision of on-site allotments, a new on-site community orchard, and the retention of protected trees.*<br>*iii. Areas of informal and formal recreation space on-site including the provision of permanent changing facilities.*<br>*iv. Adequate flood risk management across the site, including betterment works to the Sudbrook to provide downstream attenuation.*<br>*v. A layout and form that integrates, where appropriate, important hedgerows within the development.*<br>*vi. A layout and form that respects the landscape character of the edge of city setting and the* | Each Strategic Allocation has been given a site specific policy to covered detailed issues to be considered in bringing forward development. These delivery issues are based the JCS evidence base and is what is considered necessary to enable sustainable development |

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| | | *transition to suburban and rural character to south and east of the site.*<br>*vii. A layout and form that respects the setting of the heritage asset at Winneycroft Farm and the adjacent historic orchard area.*<br>*viii. A layout and form that reduces the impact of electricity pylons and high voltage lines; with the siting of residential development being a particular consideration.*<br>*ix. Primary vehicle accesses from Corncroft Lane and Winneycroft Lane.*<br>*x. Measures necessary to mitigate the traffic impact of the site, including the use of travel plans to encourage the use of more sustainable transport modes.*<br>*xi. High quality public transport facilities and connections within and adjacent to the site.*<br>*xii. Safe, easy and convenient pedestrian and cycle links within the site and to key centres and the wider green infrastructure network, providing segregated links where practical.* | |
| PMM0117 | Strategic Allocations Information | ***PLAN A10 - Winnycroft***<br><br>*Winnycroft is an area located to the south east of Gloucester city where the existing urban fringe of Gloucester meets the semi-rural area. The area is bounded by Winnycroft Lane to the west, Corncroft Lane to the north and the M5 motorway to the east and south. The existing land use is agricultural land.* | Site description added for Winnycroft Strategic Allocation |
| PMM0118 | Strategic Allocations Information | ***POLICY A11 – West Cheltenham***<br><br>*The Strategic Allocation identified at West Cheltenham (as shown on Proposals Map Plan A11) will be expected to deliver:*<br><br>*i. Approximately 1,100 new homes*<br>*ii. Approximately 45 hectares of B-class led employment land to be focussed upon a cyber security hub and other high technology and high 'Gross Value Added' generating development and ancillary employment uses*<br>*iii. All development should be employment led, delivery of housing must be in tandem with employment development*<br>*iv. A comprehensive masterplan and development strategy for the strategic allocation, set within the context of the safeguarded land at West Cheltenham, which includes:*<br>*a. a delivery strategy for employment focussed land release* | Each Strategic Allocation has been given a site specific policy to covered detailed issues to be considered in bringing forward development. These delivery issues are based the JCS evidence base and is what is considered necessary to enable sustainable development |

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| | | *b. a positive impact on the regeneration of neighbourhoods in west Cheltenham*<br>*c. Integrates built form and a comprehensive network of accessible green infrastructure, including local green space. The network will incorporate and protect notable natural features, including the Hatherley Brook, the Fiddlers Green Key Wildlife Site and important trees and hedgerows.*<br>*v. Primary vehicle accesses from Fiddlers Green Lane and B4634 Old Gloucester Road.*<br>*vi. Measures necessary to mitigate the traffic impact of the site, including the use of travel plans to encourage the use of sustainable transport modes.*<br>*vii. High quality public transport facilities and connections within and adjacent to the site.*<br>*viii. Safe, easy and convenient pedestrian and cycle links within the site, to key centres and with neighbouring existing development and the wider green infrastructure network*<br>*ix. A distribution of development that takes account of the proximity of the Hayden sewage treatment works and incorporates appropriate spatial planning arrangements and mitigation measures designed to minimise material impacts on residential properties and commercial premises. Development which is likely to be significantly affected by odours will not be permitted within the Odour Monitoring Zone identified on the proposals*<br>*x. A landscape buffer to the western boundary of the site which will provide screening between the development and the Hayden sewage treatment works.* | |
| PMM0119 | Strategic Allocations Information | ***PLAN A11 – West Cheltenham***<br><br>*Land to the west of Cheltenham is relatively flat land drained by the River Chelt. The West Cheltenham Strategic Allocation is adjacent to the urban edge of Cheltenham and has an urban fringe character. The area is bounded by Old Gloucester Road to the north, Hayden Lane to the east and Pheasant lane to the South. To the east of the allocation is land safeguarded for the further growth of Cheltenham well beyond the plan period, which includes the Hayden Sewage Treatment works. The land within the allocation is predominately in agricultural use.* | Site description added for West Cheltenham Strategic Allocation |
| PMM0120 | Indicative site layouts | **Indicative site layouts**<br><br>~~The indicative site layouts have not yet been revised following draft JCS consultation. New, more indicative and diagrammatic place-shaping layouts will replace these graphics to indicate our work on options for identifying sustainable and achievable developments on the sites. These layouts have been~~ | Deleted as the Indicative site layouts have now been revised to take into account the outputs of the examination sessions and |

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| | | ~~generated using only a specific set of constraints as set out in Strategic Allocations Report and therefore are subject to these limitations. These layouts will not be included in policy and are intended only as guidance.~~ | from the Interim Report. |
| PMM0121 | Part 7 Monitoring & Review<br>7.1<br>7.2<br>7.3<br>7.4 | PART 7 – *Delivery,* Monitoring & Review<br><br>*Delivery (including Housing Implementation Strategy)*<br><br>*Whilst the JCS can allocate sites and local authorities can discuss with landowners and developers how best to bring their sites forward in the allocated locations, there is always a risk that sites may not come forward as planned during the anticipated timescale. Therefore the NPPF states the need for a Housing Implementation Strategy (HIS) which explains what the JCS authorities will do should there be any barriers to delivering development as proposed by Policies SP1 and SP2 (see Pages 25 and 29), and also how to respond to changing circumstances. The HIS (which takes forward the Housing Background Paper – EBLO 101) sets out the trajectory and delivery for both market and affordable housing.*<br><br>*The JCS sets out key principles, but many proposals need to be developed through more detailed policy documents, such as the district plans and development briefs which will take time to prepare. Large sites will take time to masterplan and commence development, especially where significant infrastructure is required. There is likely to be a contingency supply of housing from unallocated sites, including capacity delivered through the urban areas and across rural service centres and service villages. This provides some buffer for slippage in the anticipated delivery of larger sites.*<br><br>*Delivering the strategy will also require a wide range of private, public sector and voluntary bodies working together. In preparing the strategy, the JCS authorities have worked with infrastructure providers and landowners/developers to establish that the allocated strategic sites are deliverable. If circumstances change, the JCS authorities will implement the measures set out below to ensure that the required housing and employment needs will still be met during the plan period. Any requirement to bring forward additional sites or alternative strategies in local plans will need to be in line with the distribution strategy of this plan as set out in this document in Policies SP1 and SP2.* | Text has been taken from the Delivery part of the Introduction, but has been amended to include reference to the Housing Implementation Strategy |

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| PMM0122 | 7.1<br>7.2<br>7.3<br>7.4 | *Monitoring* ~~Background~~<br><br>Monitoring the performance of the Plan is essential to assess the effectiveness of the JCS and to record whether proposals and policies are being implemented and delivered. The outputs of appropriate monitoring will enable the councils to be fully informed of the progress of development in the area and whether a full or partial review of the plan is necessary.<br><br>The NPPF sets out that plans should be flexible to adapt to changing circumstances. ~~As detailed in the introduction to this plan, t~~The councils are committed to reviewing the plan if delivery issues emerge through monitoring, and will implement measures to ensure that housing, employment and infrastructure needs are met during the plan period.<br><br>In order to ensure effective monitoring, a *Monitoring* Framework has been prepared, setting out key indicators that will track the delivery of the plan.<br><br>The tables below set out the indicators in relation to each JCS objective. They include any specifically-identified target, the source of the data, and the frequency of monitoring. The range of indicators reflects the JCS's relationship with other plans and programmes and therefore includes *relevant national* indicators ~~required by Government as part of the 'Single List', 'Contextual Indicators' (CI) which relate to local characteristics and issues of the locality~~ and other 'Local Indicators' such as those from the Local Transport Plan (LTP).<br><br>*The monitoring outcomes will be reported through a single JCS Authority Monitoring Report (AMR) which will be regularly updated*. ~~The monitoring outcomes for each Development Plan Document will be reported in each Authority's Monitoring Report (AMR).~~ The AMR is required to outline the progress in preparing the documents and assess the extent to which the policies are being implemented and their effectiveness. Where a policy is not meeting its objective, the AMR will explain why and suggest what action should be taken. The monitoring framework itself will be reviewed as part of the AMR.<br><br>*The NPPF requires plans to be flexible and responsive to change. If monitoring indicates that delivery* | Section moved from the Introduction and expanded<br><br>These changes reflect the discussions at the hearings around the trigger mechanisms and the Gloucestershire devolution bid. Includes the inspector request for an immediate review of the retail topic.<br><br>Provides for clarification as AMR's are no longer required annually. |

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| | | *problems are emerging or that circumstances are changing in other ways, the JCS authorities will consider implementing some or all the following measures to bring forward development:*<br><br>• *working with developers and infrastructure providers to remove obstacles to the delivery of sites*<br><br>• *seeking alternative sources of funding if problems with infrastructure provision is delaying development of key strategic sites*<br><br>• *the early release of safeguarded land*<br><br>• *identifying alternative site(s) in general accordance with the distribution strategy of this plan as set out in Policies SP1 and SP2 which may be delivered through District Plans*<br><br>• *working with other authorities under the Duty to Co-operate to address any unmet needs. This will include continued cross-boundary working with Stroud District Council and Wychavon District Council.* | |
| PMM0123 | Part 7 Monitoring & Review<br>7.1<br>7.2<br>7.3<br>7.4 | *Review*<br><br>*Housing Supply Review Mechanism*<br>*To reflect the government's emphasis on flexibility, the methodology for a JCS review will be reviewed in whole or in part is based upon a trigger mechanism.*<br><br>*The trigger mechanism solely for monitoring purposes is a 10% buffer applied to the Housing Requirement of each JCS Authority on an annual basis. This mechanism will serve as an early warning to the JCS Authorities when a housing land supply shortfall could be imminent and corrective action is required. Thus the mechanism would be triggered where completions in any year fell below 110% of the Trajectory.*<br><br>***In the event of the strategic allocations cumulatively delivering less than 75% of their projected housing completions (considered annually), over three consecutive years (based on the trajectories set*** | These changes reflect the discussions at the hearings around the trigger mechanisms and the Gloucestershire devolution bid. Includes the inspector request for an immediate review of the retail topic. |

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| | | ***out in the Housing Implementation Strategy), this will trigger the need for the consideration of a partial or full JCS review.***<br><br>*In line with the Gloucestershire devolution bid to the Government, any full or partial review is intended to be aligned with the other Gloucestershire authorities. This is intended to begin within 5 years of adoption of the JCS in line with national guidance.*<br><br>*"We will work together to achieve … core strategies and local plans … and coordination of plan reviews by 2020" (Gloucestershire Devolution Bid - September 2015)*<br><br>*Retail Review*<br>*Notwithstanding the above trigger mechanism, a single issue review of the JCS will be undertaken for the Retail and Town Centres policy (SD3) immediately after the adoption of the JCS. This single issue review will take approximately 2 years to complete.* | |
| PMM0123a | Part 7 Monitoring & Review | *Gloucester Housing Supply Review*<br><br>*As presented in the housing trajectories below, Gloucester City has an identified shortfall against the total JCS housing requirement of 1,313 dwellings. Despite this shortfall, Gloucester City can maintain at least a 5.8 years supply of housing land and sufficient sites to delivering housing in the short to medium term. However, it is critical that the shortfall is addressed over the plan period and the JCS authorities are providing an approach to dealing within this in a strategic and plan-led way.*<br><br>***To deal with the shortfall the JCS authorities will undertake an early review of Gloucester's housing supply following the adoption of the JCS.***<br><br>*It has not been possible to identify sites within the JCS now to meet all of Gloucester's housing requirements for the entire plan period. However, the JCS authorities are committed to continue to working, through a review of the plan, to identify and allocate sites that will deliver housing growth. A review of the plan will explore the further potential for sites to meet Gloucester's needs in the latter part of the plan period.* | Modification included to set out the commitment to deal with Gloucester's housing shortfall through an early review. |

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| | | *This review will allow consideration of any other development options that become available, both within and outside the JCS area. This could include further development opportunities within the urban area that are not currently deliverable, as well as exploring the potential for urban extensions. The JCS authorities have a Statement of Cooperation in place with Stroud District regarding the need to explore meeting unmet needs arising from the JCS area within Stroud District where it is reasonable to do so and consistent with achieving sustainable development. As such, it is important than any review is undertaken in tandem with the review of the Stroud Local Plan so that all potential development alternatives are comprehensively explored using agreed site assessment criteria through the plan-making process.* | |
| PMM0123b | Part 7 Monitoring & Review | *Tewkesbury Housing Supply Review*<br><br>*As presented in the housing trajectories below, Tewkesbury Borough has an identified shortfall against the total JCS housing requirement of 2,843 dwellings. This shortfall has been significantly exacerbated by a recent decision by the Defence Infrastructure Organisation regarding the now delayed release of the MoD Ashchurch strategic allocation which was expected to deliver 2,125 dwellings to 2031. Despite this shortfall, Tewkesbury Borough can maintain at least a 5.3 years supply of housing land and sufficient sites to deliver housing in the short to medium term*. However, it is critical that the shortfall is addressed over the plan period and the JCS authorities are providing an approach to dealing with this in a strategic and plan-led way.*<br><br>***To deal with the shortfall the JCS authorities will undertake a review of Tewkesbury's housing supply immediately after the adoption of the JCS.***<br><br>*There remains development potential within the Tewkesbury town and Ashchurch area to meet the housing requirements of the Borough. However, there exists barriers and uncertainty over delivery/availability of sites at the current time which means any alternative strategic allocations are not possible within the JCS now. However, the JCS authorities are committed to continue to working, through a review of plan, to identify and allocate sites that will deliver housing and employment growth.* | Modification included to set out the commitment to deal with Tewkesbury's housing shortfall through an early review. |

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| | | *The MoD Ashchurch allocation area continues to be an option for sustainable development. The DIO have confirmed the intention to release part of the site for development and there is land that was within the allocation that is not in the DIO/MoD ownership. These land parcels have the potential for release within the plan period and could deliver up 1,600 dwellings. The challenge for these sites that remain available is around access, masterplanning and infrastructure provision which would need to be overcome before an allocation could be made.*<br><br>*A site at Fiddington has been presented as an omission site through the JCS examination and, as concluded in the Inspector's Interim Report (May 2016), it is the only other sustainable strategic site around Tewkesbury town within the JCS area. The site does therefore have potential to meet the development needs of the Borough, however, there are concerns about deliverability at the current time. This revolves around the highway infrastructure needs of the area and investigations into a new 'off-line' alternative to the A46 through Ashchurch. Until more is known about the delivery of this infrastructure then allocation of the site at Fiddington in the JCS now is not considered to be appropriate.*<br><br>*In addition to this, there is potential within the wider Tewkesbury town and Ashchurch area that present options to meeting housing requirements. This includes sites not discussed through the JCS to date, including those presented through the Tewkesbury Strategic Assessment of Land Availability. However, more site investigation and evidence gathering would need to be undertaken to assess whether they are sustainable options and provide certainty over their deliverability.*<br><br>*The Borough Council have submitted a bid for the HCA Capacity Fund in order to support the delivery of growth in this area and unlock housing sites both within and beyond the current plan period. This will include facilitating the earlier release of sites where possible, particularly exploring the potential to bring forward the remaining development parcels on the MoD strategic allocation where access and place making are challenges. However it will also involve support for developing a strategy for longer-term growth, looking beyond sites that have been identified through the JCS process and incorporating the impact and opportunities of an off-line A46 route. This will include support for a Development Delivery Plan, including strategic masterplanning, to provide a comprehensive approach which addresses issues such as place making, transport, community building, social infrastructure and green infrastructure. This* | |

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| | | *work will help to inform the review of the JCS and the issue of Tewkesbury's housing supply.*<br><br>*Outside of the JCS area a site Mitton, in Wychavon District, has been promoted to the JCS examination as an omission site which could help meet the requirements of Tewkesbury Borough. The JCS authorities are working with Wychavon on the delivery of this site and have an agreed planning statement in place to deal with a first phase of the site coming forward to meet Tewkesbury's needs. The JCS authorities will continue to work with Wychavon on the potential delivery of the site.*<br><br>**The 5 year supply calculations and housing trajectories provided in the main modifications JCS do not yet include a full update of permissions granted in 2016/17. Tewkesbury Borough has resolved to permit sites that would deliver 269 dwellings that have not yet been taken into account.* | |
| PMM0124 | Part 7 Monitoring & Review | *Trajectories*<br><br>*Under each Council, the table gives the delivery by year split into other delivery and strategic allocations, followed by the total and cumulative calculations. This is then followed by the annual requirements, which for the case of Cheltenham has a stepped approach. The last two columns give the net difference between requirements and completions and annual requirement taking into account past/projected completions.*<br><br>*Then again for each Council is a chart which graphically illustrate the requirement versus completions on a cumulative basis.*<br><br>*For each Council, the 5 years supply calculation is provided.*<br><br>***Approach to Previous Delivery Shortfalls Against the Housing Requirement***<br><br>*The JCS examination included a discussion regarding whether any plan period shortfalls in delivery could be spread over the remainder of the plan period (Liverpool approach), allowing time for sites to begin delivery to address it. The Submission JCS was accompanied by 5 year supply calculations that included the entire shortfall within the first 5 years (Sedgefield approach). However, it is considered that there is* | Information is from the HIS. This would remain in the HIS on issuing. |

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
|---|---|---|---|
| | | *real merit in using the Liverpool approach and spreading the shortfall across the plan period.*<br><br>*The use of the Liverpool approach has been found to be acceptable in a recent Inspector's report on the Basingstoke and Deane Local Plan 2011-2029 dated 6th April 2016. In his report, the Inspector states (at paragraph 94):*<br>*"The Council's reasons for pursuing the Liverpool approach are linked to its partial reliance on several large sites, which require the provision of significant infrastructure prior to the completion of the first dwellings. These major allocations, which I deal with below in more detail, are sustainably located, near to the main urban areas, especially Basingstoke; they can achieve economies of scale and important community and environmental provision. In my view, these benefits outweigh the delay in their implementation. I therefore support the use of the Liverpool approach for Basingstoke and Deane."*<br><br>*In this case it was noted that the larger allocations would be delivering a significant proportion of the area's housing need. However, the challenge in delivering these allocations was recognised and that it would take more time for maximum delivery of housing to occur on these sites, particularly due to infrastructure provision. In this Inspector's view the shortfall should be spread across the plan period to allow time for the larger allocations to deliver. The situation at Basingstoke and Dean is comparable and relevant to the JCS.*<br><br>*The JCS strategic allocation sites are anticipated to start delivering at different years during the plan period and the delivery on each site is staggered to make an allowance for sites to build up to maximum annual delivery over a number of years. The use of the Liverpool approach, as per the Basingstoke and Dean example, would allow time for these sites to come forward to help meet the previous shortfall and deliver the ongoing annual requirements.*<br><br>*The JCS authorities have therefore prepared trajectory scenarios that use both the Sedgefield and Liverpool approaches to demonstrate the impact that each would have on the 5 year supply calculations. The Inspector has accepted that the Liverpool approach is justified within the JCS area and supports the use of this approach in her Interim Report (Exam 232, Para 26).* | |

## JCS Table of Main Modifications

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
|---|---|---|---|
| PMM0125 | Part 7 Monitoring & Review | *Gloucester*<br><br>*The charts below for Gloucester, illustrates a historic undersupply, but an over-supply in the middle plan period which gives a comfortable 5-year supply using the Liverpool method. The latter 3 years of the plan period shows the shortfall. However, an early review of Gloucester's housing supply will enable sites to be identified to meet the full requirement.* | Delivery and supply calculations provided for each authority area. |

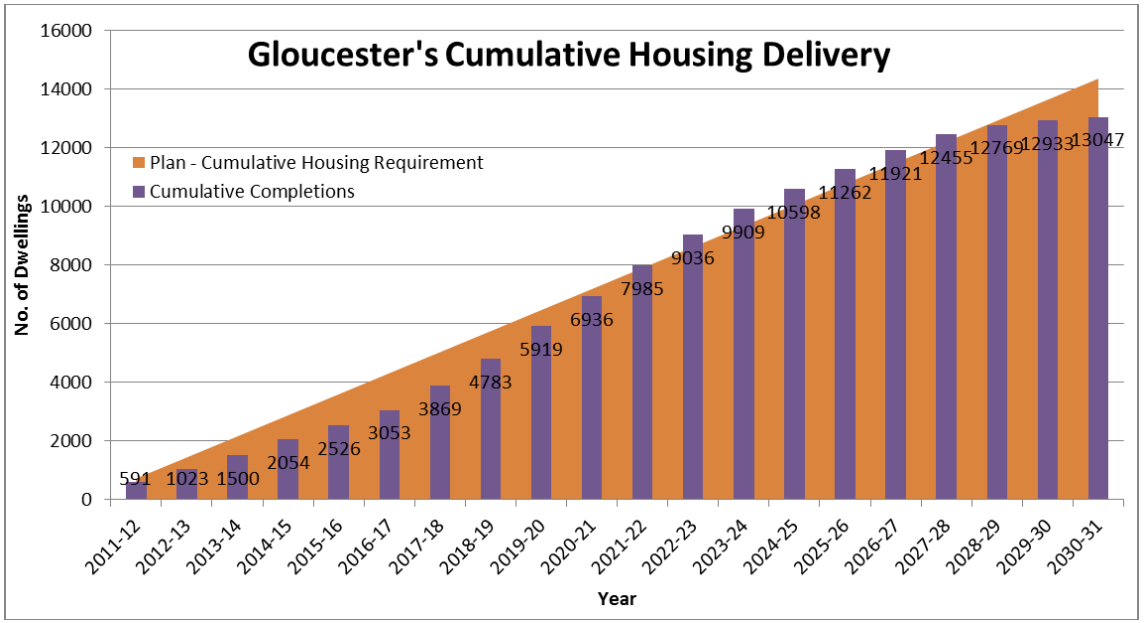
## JCS Table of Main Modifications

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
|---|---|---|---|
| | | *(NEW TABLE)* | |

**Gloucester** — **Liverpool**

| Year | Other Delivery | SA Delivery | Total Projected Completions | Cumulative Completions | **Plan** - Annual Housing Requirement | **Plan** - Cumulative Housing Requirement | **Monitor** - No. of dwellings above or below cumulative requirement | **Manage** - annual requirement taking account of past/projected completions |
|---|---|---|---|---|---|---|---|---|
| 2011-12 | 591 | 0 | 591 | 591 | 718 | 718 | 127 | 718 |
| 2012-13 | 432 | 0 | 432 | 1023 | 718 | 1436 | 413 | 724 |
| 2013-14 | 477 | 0 | 477 | 1500 | 718 | 2154 | 654 | 740 |
| 2014-15 | 554 | 0 | 554 | 2054 | 718 | 2872 | 818 | 754 |
| 2015-16 | 472 | 0 | 472 | 2526 | 718 | 3590 | 1064 | 766 |
| 2016-17 | 527 | 0 | 527 | 3053 | 718 | 4308 | 1255 | 785 |
| 2017-18 | 741 | 75 | 816 | 3869 | 718 | 5026 | 1157 | 802 |
| 2018-19 | 689 | 225 | 914 | 4783 | 718 | 5744 | 961 | 801 |
| 2019-20 | 761 | 375 | 1136 | 5919 | 718 | 6462 | 543 | 792 |
| 2020-21 | 567 | 450 | 1017 | 6936 | 718 | 7180 | 244 | 763 |
| 2021-22 | 524 | 525 | 1049 | 7985 | 718 | 7898 | -87 | 740 |
| 2022-23 | 451 | 600 | 1051 | 9036 | 718 | 8616 | -420 | 709 |
| 2023-24 | 273 | 600 | 873 | 9909 | 718 | 9334 | -575 | 671 |
| 2024-25 | 89 | 600 | 689 | 10598 | 718 | 10052 | -546 | 646 |
| 2025-26 | 64 | 600 | 664 | 11262 | 718 | 10770 | -492 | 640 |
| 2026-27 | 64 | 595 | 659 | 11921 | 718 | 11488 | -433 | 636 |
| 2027-28 | 64 | 470 | 534 | 12455 | 718 | 12206 | -249 | 631 |
| 2028-29 | 64 | 250 | 314 | 12769 | 718 | 12924 | 155 | 656 |
| 2029-30 | 64 | 100 | 164 | 12933 | 718 | 13642 | 709 | 770 |
| 2030-31 | 64 | 50 | 114 | 13047 | 718 | 14360 | 1313 | 1073 |

## JCS Table of Main Modifications

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
|---|---|---|---|
| | | *(NEW CHART)*  | |

## JCS Table of Main Modifications

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
|---|---|---|---|
| | | *(NEW TABLE)* | |

**5 year supply calculation**

| **Pre Adoption Delivery** | | | |
|---|---|---|---|
| GCC Annual Housing Requirement | a | 718 | 718 |
| Number of years into the plan period to adoption | b | 6 | 6 |
| Requirement to plan adoption | c | 4308 | 4308 |
| Actual Delivery 2011-2016 | d | 2526 | 2526 |
| Anticipated Delivery to Plan adoption (2016 to 2017) | e | 505 | 505 |
| Total anticipated Delivery to Plan adoption | f = d + e | 3031 | 3031 |
| | | | |
| Anticipated shortfall on adoption | g = c - f | 1277 | 1277 |
| | | | |
| **5YHLS from Adoption** | | **Sedgefield** | **Liverpool** |
| 5 Year Requirement | h = a x 5 | 3590 | 3590 |
| Remainder of plan period 2022 to 2031 | i | 14 | 14 |
| Plan Period Shortfall to be met within the five year period | j, Sedge = g, Liv = (g/i) x 5 | 1277 | 456 |
| NPPF Buffer | k = 5% of (h + j) | 243 | 202 |
| Total no. of dwellings required | m = h + j + k | 5110 | 4248 |
| Total anticipated supply | n | 4945 | 4945 |
| Percentage of total requirement met | p = n/m | **96.8%** | **116.4%** |
| Supply in Years | p = n/m*5 | **4.8** | **5.8** |

## JCS Table of Main Modifications

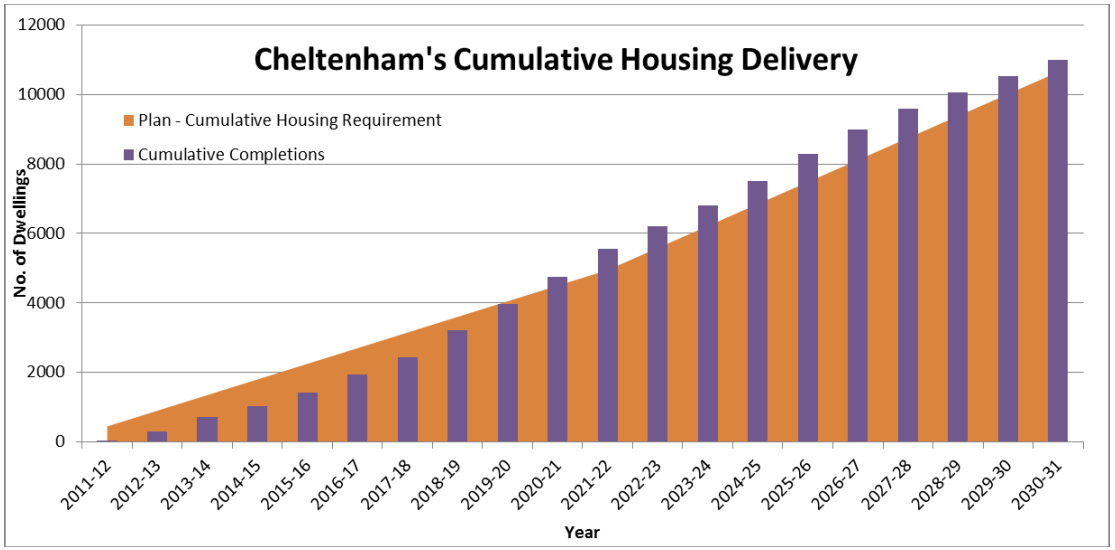
| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
|---|---|---|---|
| PMM0126 | Part 7 Monitoring & Review | *Cheltenham*<br><br>*The charts below for Cheltenham, illustrates a historic undersupply, but an over-supply in the middle and later plan period giving comfortable 5-year supply.*<br><br>*A step trajectory has been employed up to 2021/2022, which improves the 5 year supply.* | Delivery and supply calculations provided for each authority area. |

## JCS Table of Main Modifications

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
|---|---|---|---|
| | | *(NEW TABLE)* | |

| Cheltenham | | | | | | | | Liverpool |
|---|---|---|---|---|---|---|---|---|
| Year | Other Delivery | SA Delivery | Total Projected Completions | Cumulative Completions | **Plan** - Annual Housing Requirement | **Plan** - Cumulative Housing Requirement | **Monitor** - No. of dwellings above or below cumulative requirement | **Manage** - annual requirement taking account of past/projected completions |
| 2011-12 | 33 | 0 | 33 | 33 | 450 | 450 | 417 | 450 |
| 2012-13 | 267 | 0 | 267 | 300 | 450 | 900 | 600 | 471 |
| 2013-14 | 413 | 0 | 413 | 713 | 450 | 1350 | 637 | 482 |
| 2014-15 | 316 | 0 | 316 | 1029 | 450 | 1800 | 771 | 485 |
| 2015-16 | 397 | 0 | 397 | 1426 | 450 | 2250 | 824 | 495 |
| 2016-17 | 526 | 0 | 526 | 1952 | 450 | 2700 | 748 | 502 |
| 2017-18 | 415 | 75 | 490 | 2442 | 450 | 3150 | 708 | 500 |
| 2018-19 | 440 | 340 | 780 | 3222 | 450 | 3600 | 378 | 501 |
| 2019-20 | 433 | 310 | 743 | 3965 | 450 | 4050 | 85 | 479 |
| 2020-21 | 487 | 310 | 797 | 4762 | 450 | 4500 | -262 | 457 |
| 2021-22 | 471 | 335 | 806 | 5568 | 450 | 4950 | -618 | 426 |
| 2022-23 | 282 | 360 | 642 | 6210 | 633 | 5583 | -627 | 388 |
| 2023-24 | 238 | 360 | 598 | 6808 | 633 | 6216 | -592 | 563 |
| 2024-25 | 218 | 485 | 703 | 7511 | 633 | 6849 | -662 | 559 |
| 2025-26 | 188 | 580 | 768 | 8279 | 633 | 7482 | -797 | 538 |
| 2026-27 | 140 | 580 | 720 | 8999 | 633 | 8115 | -884 | 500 |
| 2027-28 | 83 | 510 | 593 | 9592 | 633 | 8748 | -844 | 456 |
| 2028-29 | 93 | 380 | 473 | 10065 | 633 | 9381 | -684 | 422 |
| 2029-30 | 79 | 380 | 459 | 10524 | 633 | 10014 | -510 | 405 |
| 2030-31 | 92 | 380 | 472 | 10996 | 633 | 10647 | -349 | 378 |

## JCS Table of Main Modifications

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
|---|---|---|---|
| | | *(NEW CHART)*  | |

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>

*(NEW TABLE)*

<table>
<tr><td colspan="4">5 year supply calculation</td></tr>
<tr><td colspan="4"></td></tr>
<tr><td>Pre Adoption Delivery</td><td></td><td></td><td></td></tr>
<tr><td>CBC Annual Housing Requirement</td><td>a</td><td>450</td><td>450</td></tr>
<tr><td>Number of years into the plan period to adoption</td><td>b</td><td>6</td><td>6</td></tr>
<tr><td>Requirement to plan adoption</td><td>c</td><td>2700</td><td>2700</td></tr>
<tr><td>Actual Delivery 2011-2016</td><td>d</td><td>1426</td><td>1426</td></tr>
<tr><td>Anticipated Delivery to Plan adoption (2016 to 2017</td><td>e</td><td>496</td><td>496</td></tr>
<tr><td>Total anticipated Delivery to Plan adoption</td><td>f = d + e</td><td>1922</td><td>1922</td></tr>
<tr><td></td><td></td><td></td><td></td></tr>
<tr><td>Anticipated shortfall on adoption</td><td>g = c - f</td><td>778</td><td>778</td></tr>
<tr><td></td><td></td><td></td><td></td></tr>
<tr><td>5YHLS from Adoption</td><td></td><td>Sedgefield</td><td>Liverpool</td></tr>
<tr><td>5 Year Requirement</td><td>h = a x 5</td><td>2250</td><td>2250</td></tr>
<tr><td>Remainder of plan period 2022 to 2031</td><td>i</td><td>14</td><td>14</td></tr>
<tr><td>Plan Period Shortfall to be met within the five year period</td><td>j, Sedge = g, Liv = (g/i) x 5</td><td>778</td><td>278</td></tr>
<tr><td>NPPF Buffer</td><td>k = 20% of (h + j)</td><td>606</td><td>506</td></tr>
<tr><td>Total no. of dwellings required</td><td>m = h + j + k</td><td>3634</td><td>3034</td></tr>
<tr><td>Total anticipated supply 2017 to 2022</td><td>n</td><td>3615</td><td>3615</td></tr>
<tr><td>Percentage of total requirement met</td><td>p = n/m</td><td>99.5%</td><td>119.2%</td></tr>
<tr><td>Supply in Years</td><td>p = n/m*5</td><td>5.0</td><td>6.0</td></tr>
</table>

</td><td></td></tr>
<tr><td>PMM0127</td><td>Part 7 Monitoring & Review</td><td>

*Tewkesbury*

*The charts below for Tewkesbury, demonstrates sufficient housing land supply, including a 5 year supply, until the middle of the plan period where there is a shortfall. A step has been introduced from 2024/25 to*

</td><td>Delivery and supply calculations provided for each authority area.</td></tr>
</table>

## JCS Table of Main Modifications

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
|---|---|---|---|
| | | *provide Tewkesbury with a sufficient supply until 2028/29. This will enable adequate time to undertake an immediate review of Tewkesbury's housing supply while maintaining a 5 year supply. It should be noted that the 5 year supply calculations and housing trajectories provided in the main modifications JCS do not yet include a full update of permissions granted in 2016/17. Tewkesbury Borough has resolved to permit sites that would deliver 269 dwellings that have not yet been taken into account. This will reduce the housing shortfall and increase the 5 year supply.* | |

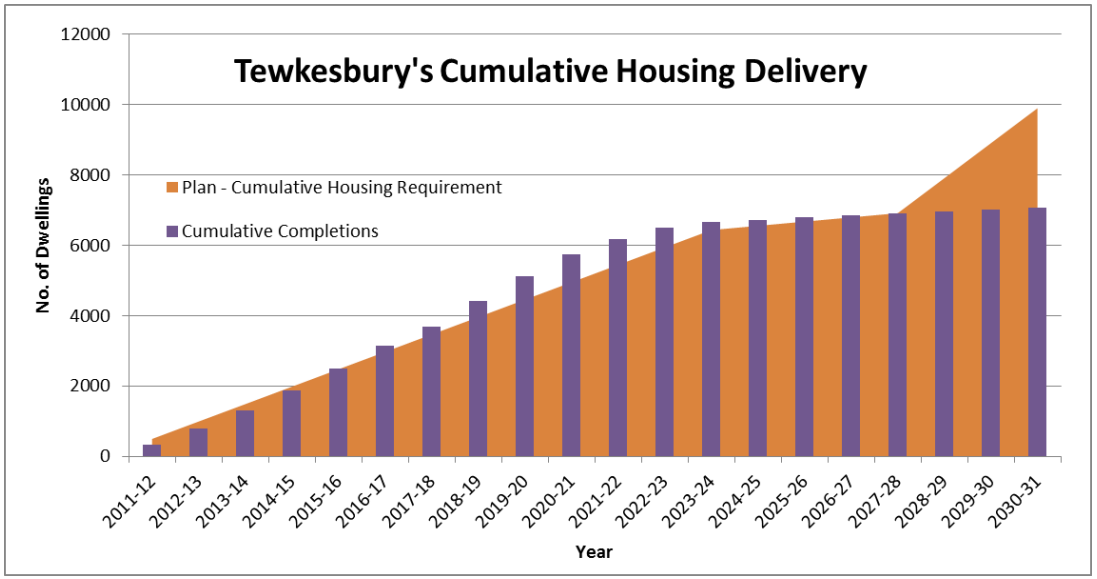
## JCS Table of Main Modifications

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
|---|---|---|---|
| | | *(NEW TABLE)* | |

**Tewkesbury**

| Year | Other Delivery | SA Delivery | Total Completions and Projected Completions | Cumulative Completions | **Plan** - Annual Housing Requirement | **Plan** - Cumulative Housing Requirement | **Monitor** - No. of dwellings above or below cumulative requirement | **Manage** - annual requirement taking account of past/projected completions |
|---|---|---|---|---|---|---|---|---|
| 2011-12 | 318 | 0 | 318 | 318 | 495 | 495 | 177 | 495 |
| 2012-13 | 462 | 0 | 462 | 780 | 495 | 990 | 210 | 530 |
| 2013-14 | 513 | 0 | 513 | 1293 | 495 | 1485 | 192 | 537 |
| 2014-15 | 573 | 0 | 573 | 1866 | 495 | 1980 | 114 | 533 |
| 2015-16 | 630 | 0 | 630 | 2496 | 495 | 2475 | -21 | 518 |
| 2016-17 | 635 | 0 | 635 | 3131 | 495 | 2970 | -161 | 491 |
| 2017-18 | 565 | 0 | 565 | 3696 | 495 | 3465 | -231 | 463 |
| 2018-19 | 688 | 25 | 713 | 4409 | 495 | 3960 | -449 | 449 |
| 2019-20 | 598 | 125 | 723 | 5132 | 495 | 4455 | -677 | 405 |
| 2020-21 | 496 | 125 | 621 | 5753 | 495 | 4950 | -803 | 360 |
| 2021-22 | 294 | 125 | 419 | 6172 | 495 | 5445 | -727 | 334 |
| 2022-23 | 222 | 100 | 322 | 6494 | 495 | 5940 | -554 | 350 |
| 2023-24 | 156 | 0 | 156 | 6650 | 495 | 6435 | -215 | 384 |
| 2024-25 | 76 | 0 | 76 | 6726 | 120 | 6555 | -171 | 452 |
| 2025-26 | 76 | 0 | 76 | 6802 | 120 | 6675 | -127 | 86 |
| 2026-27 | 61 | 0 | 61 | 6863 | 120 | 6795 | -68 | 95 |
| 2027-28 | 56 | 0 | 56 | 6919 | 120 | 6915 | -4 | 106 |
| 2028-29 | 46 | 0 | 46 | 6965 | 995 | 7910 | 945 | 119 |
| 2029-30 | 46 | 0 | 46 | 7011 | 995 | 8905 | 1894 | 1184 |
| 2030-31 | 46 | 0 | 46 | 7057 | 995 | 9900 | 2843 | 1374 |

## JCS Table of Main Modifications

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
|---|---|---|---|
| | | *(NEW CHART)*  | |

## JCS Table of Main Modifications

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
|---|---|---|---|
| | | *(NEW TABLE)* | |

**5 Year Supply Calculation**

| **Pre Adoption Delivery** | | |
|---|---|---|
| TBC Annual Housing Requirement | a | 495 |
| Number of years into plan adoption | b | 6 |
| Requirement to plan adoption | c | 2970 |
| Actual Delivery 2011-2016 | d | 2496 |
| Anticipated Delivery to Plan adoption (2016 to 2017) | e | 560 |
| Total anticipated Delivery to Plan adoption (2011 to 2017) | f = d + e | 3056 |
| | | |
| Anticipated over supply on adoption | g = f- c | -86 |
| | | |
| **5YHLS from Adoption** | | |
| 5 Year Requirement | h = a x 5 | 2475 |
| Remainder of plan period 2022 to 2031 | i | 14 |
| Plan Period over supply to offset over the five year period | j = g | -86 |
| NPPF Buffer | k = 20% of h | 478 |
| Total no. of dwellings required | m = h + j + k | 2867 |
| Total anticipated supply 2017 to 2022 | n | 3041 |
| Percentage of total requirement met | p = n/m | **106.1%** |
| Supply in Years | p = n/m*5 | **5.3** |

| | | | |
|---|---|---|---|
| PMM0128 | Part 7 Monitoring & Review | *Strategic Allocations Trajectory (including Mitton in Wychavon)* | Updated strategic allocations trajectory provided. |

## JCS Table of Main Modifications

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>

*(NEW TABLE)*

<table>
<tr><th>Site Name</th><th>JCS Period Delivery</th><th>2017-18</th><th>2018-19</th><th>2019-20</th><th>2020-21</th><th>2021-22</th><th>2022-23</th><th>2023-24</th><th>2024-25</th><th>2025-26</th><th>2026-27</th><th>2027-28</th><th>2028-29</th><th>2029-30</th><th>2030-31</th></tr>
<tr><td>Land at West Cheltenham</td><td>1100</td><td></td><td>25</td><td>50</td><td>50</td><td>75</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td></tr>
<tr><td>North West Cheltenham - CBC</td><td>2225</td><td></td><td>60</td><td>60</td><td>60</td><td>60</td><td>60</td><td>60</td><td>185</td><td>280</td><td>280</td><td>280</td><td>280</td><td>280</td><td>280</td></tr>
<tr><td>A5 North West Cheltenham - TBC</td><td>2060</td><td>75</td><td>255</td><td>200</td><td>200</td><td>200</td><td>200</td><td>200</td><td>200</td><td>200</td><td>200</td><td>130</td><td>0</td><td>0</td><td>0</td></tr>
<tr><td>Innsworth</td><td>1300</td><td></td><td>25</td><td>50</td><td>50</td><td>125</td><td>150</td><td>150</td><td>150</td><td>150</td><td>150</td><td>150</td><td>150</td><td></td><td></td></tr>
<tr><td>Twigworth</td><td>995</td><td></td><td></td><td>25</td><td>50</td><td>50</td><td>125</td><td>150</td><td>150</td><td>150</td><td>150</td><td>145</td><td></td><td></td><td></td></tr>
<tr><td>South Churchdown</td><td>1100</td><td></td><td></td><td>50</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>100</td><td>50</td></tr>
<tr><td>North Brockworth</td><td>1500</td><td>75</td><td>150</td><td>150</td><td>150</td><td>150</td><td>150</td><td>150</td><td>150</td><td>150</td><td>150</td><td>75</td><td></td><td></td><td></td></tr>
<tr><td>Winnycroft</td><td>620</td><td></td><td>50</td><td>100</td><td>100</td><td>100</td><td>75</td><td>50</td><td>50</td><td>50</td><td>45</td><td></td><td></td><td></td><td></td></tr>
<tr><td>Mitton (Phase One)</td><td>500</td><td></td><td>25</td><td>125</td><td>125</td><td>125</td><td>100</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td>Total Delivery</td><td>11400</td><td>150</td><td>590</td><td>810</td><td>885</td><td>985</td><td>1060</td><td>960</td><td>1085</td><td>1180</td><td>1175</td><td>980</td><td>630</td><td>480</td><td>430</td></tr>
</table>

</td><td></td></tr>
<tr><td>PMM0129</td><td>Monitoring Framework</td><td>

*Monitoring Framework*

*Below is a list of monitoring indicators that will be collected by the JCS Authorities and other external organisations that may be included within the AMR, where data is available in any given year.*

<table>
<tr><th colspan="4">Building a strong and competitive urban economy</th></tr>
<tr><th>Indicator</th><th>Target</th><th>Source</th><th>Period</th></tr>
<tr><td>Net additional jFobs created by sector (employment generating uses)</td><td>A minimum of ~~28,000~~ *39,500* jobs created over the plan period</td><td>GCC Inform</td><td>Annually</td></tr>
<tr><td>Economically inactive persons aged 16-64</td><td>Maintain levels close to the south west and national average</td><td>ONS</td><td>Annually</td></tr>
</table>

</td><td>Section updated to reflect the JCS Modifications and the removal of those indicators that are considered more appropriate for monitoring district level plans</td></tr>
</table>

## JCS Table of Main Modifications

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>Net amount of employment floorspace created by use class (employment-generating uses)</td><td>~~34-60ha~~ 192ha of employment land ~~floorspace created~~ delivered over the plan period.</td><td>Annual Employment Monitoring</td><td>Annually</td></tr>
<tr><td>Amount of employment land lost to other non-employment-generating uses</td><td>No target but annually assessed</td><td>Annual Employment Monitoring</td><td>Annually</td></tr>
<tr><td>Gross weekly earnings of full- time workers.</td><td>Maintain levels close to the south west and national average</td><td>ONS/NOMIS</td><td>Annually</td></tr>
<tr><td>Percentage of residents with NVQ Level 4 qualification and above</td><td>Maintain levels close to the south west and national average</td><td>ONS</td><td>Annually</td></tr>
<tr><td>Net new business start-ups</td><td>To increase business start-ups in the JCS area, improving on the rate of start-ups per 10,000 working age people against other English districts</td><td>GCC Inform</td><td>Annually</td></tr>
</table>
</td><td></td></tr>
<tr><td>PMM0130</td><td>Monitoring Framework</td><td>
<table>
<tr><th colspan="4">Meeting the challenges of climate change</th></tr>
<tr><th>Indicator</th><th>Target</th><th>Source</th><th>Period</th></tr>
</table>
</td><td>Section updated to reflect the JCS Modifications and the removal of those indicators that are considered more</td></tr>
</table>

## JCS Table of Main Modifications

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | | | | | Reason |
|---|---|---|---|---|---|---|---|
| | | Per capita reduction in $CO_2$ emissions by local authority area | 60% reduction in $CO_2$ emissions across Gloucestershire by 2020/21 from the 2005 baseline year | Greenhouse Gas Report~~/LTP3 Annual Progress Report~~ | Annually | | appropriate for monitoring district level plans |
| | | New developments incorporating Sustainable Drainage Systems (SuDS) development | No target but monitoring progress | Internal monitoring (SA indicator) | Annually | | |
| | | Installed Renewable Capacity for Gloucestershire | No target but monitoring progress | RegenSW Renewable Energy Progress Report – Annual Survey (SA indicator) | Annually | | |
| | | ~~10% of energy demand from major sites delivered from decentralised, renewable or low carbon sources~~ | ~~All developments over 10 residential units or non-residential development over 1000m2~~ | ~~Internal monitoring~~ | ~~Annually~~ | | |
| | | Number of planning permissions granted contrary to Environment Agency advice on flooding or water quality grounds. | No permissions granted contrary to EA advice | Internal monitoring | Annually | | |

## JCS Table of Main Modifications

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>
<table>
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</table>
</td><td></td></tr>
<tr><td>PMM0131</td><td>Monitoring Framework</td><td>
<table>
<tr><th colspan="4">~~Meeting the challenges of climate change~~ Promoting Sustainable Transport</th></tr>
<tr><th>Indicator</th><th>Target</th><th>Source</th><th>Period</th></tr>
<tr><td>~~Local bus passenger journeys~~ Increase use of bus</td><td>~~Maintain and increase journeys from a base year of 2011/12 (21,361)~~ Increase number of bus passenger journeys</td><td>LTP~~3~~ Annual Progress Report.</td><td>Annually</td></tr>
<tr><td>~~Annualised index of cycling trips~~ Increase use of cycling</td><td>~~No target but monitoring progress~~ Increase the number of cycle users at sites across the county</td><td>LTP~~3~~ Annual Progress Report.</td><td>Annually</td></tr>
<tr><td>Increase use of rail</td><td>Increase the number of rail ticket sales from railway stations</td><td>LTP~~3~~ Annual Progress Report.</td><td>Annually</td></tr>
<tr><td>~~Average journey time per mile during morning peak~~ Journey time reliability on primary strategic routes</td><td>~~Maintain and improve journey time~~ Maintain average journey times at 2015/16 levels</td><td>LTP~~3~~ Annual Progress Report.</td><td>Annually</td></tr>
</table>
</td><td>Section updated to reflect the JCS Modifications and the removal of those indicators that are considered more appropriate for monitoring district level plans</td></tr>
</table>

## JCS Table of Main Modifications

<table>
<tr><th>Proposed Modification Number</th><th>Paragraph in Pre-Submission JCS</th><th>JCS Pre-Submission original text with track changes</th><th>Reason</th></tr>
<tr><td></td><td></td><td>
<table>
<tr><td>~~Morning peak period traffic – number of vehicles travelling towards urban centres~~ Number of peak hour vehicle journeys</td><td>~~Traffic to remain at current levels compared with 2077-2010 average AM peak period traffic: Gloucester 5539 vehicles Cheltenham 12936 vehicles~~ Restrict growth in the number of peak hour vehicle journeys on local access routes</td><td>*LTP~~3~~ Annual Progress Report.*</td><td>Annually</td></tr>
<tr><td>~~Levels of self containment~~</td><td>~~Continue to improve on 2011 levels: Gloucester 66% Cheltenham 77% Tewkesbury 39%~~</td><td>~~Census returns~~</td><td>~~10 year census~~</td></tr>
</table>
</td><td></td></tr>
<tr><td>PMM0132</td><td>Monitoring Framework</td><td>
<table>
<tr><th colspan="4">Delivering a wide choice of quality homes</th></tr>
<tr><th>Indicator</th><th>Target</th><th>Source</th><th>Period</th></tr>
<tr><td>Net dwelling completions, based on the set housing requirements and 5-year housing supply</td><td>To deliver against the established objectively assessed need over the plan period.</td><td>Annual Housing Monitoring</td><td>Annually</td></tr>
<tr><td>Net completions of Gypsy, Traveller and Travelling Showpeople accommodation</td><td>To deliver against the established objectively assessed need over the plan</td><td>Annual Housing Monitoring</td><td>Annually</td></tr>
</table>
</td><td></td><td>Section updated to reflect the JCS Modifications and the removal of those indicators that are considered more appropriate for monitoring district level plans</td></tr>
</table>

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | | | | | Reason |
|---|---|---|---|---|---|---|---|
| | | against requirements, based on the set target | period. | | | | |
| | | Net affordable housing completions against annual requirements | To deliver against the established objectively assessed need over the plan period. | Internal monitoring | Annually | | |
| | | *Cumulative housing completions on JCS Strategic Allocations.* | *Minimum 75% of the annual cumulative requirement of the three districts.* | *Internal monitoring* | *Annually* | | |
| PMM0133 | Monitoring Framework | **Promoting healthy communities** | | | | | Section updated to reflect the JCS Modifications and the removal of those indicators that are considered more appropriate for monitoring district level plans |
| | | **Indicator** | **Target** | **Source** | **Period** | | |
| | | Number of Air Quality Management Areas | Reduce the number of Air Quality Management Areas. | LTP~~3~~ Annual Progress Report | Annually | | |
| | | ~~Access to services and facilities by public transport, walking and cycling~~ *Maintain bus passenger access to facilities* | ~~90% of Gloucestershire residents to be able to access services and facilities within a 30-45 minute journey time by public transport, walking and cycling~~ *Maintain level of access to GP services and facilities by public transport within 45 minutes* | LTP~~3~~ Annual Progress Report | Annually | | |
| | | ~~Amount of public open space provided~~ | ~~All schemes to meet policy standards for the~~ | ~~Internal monitoring~~ | ~~Annually~~ | | |

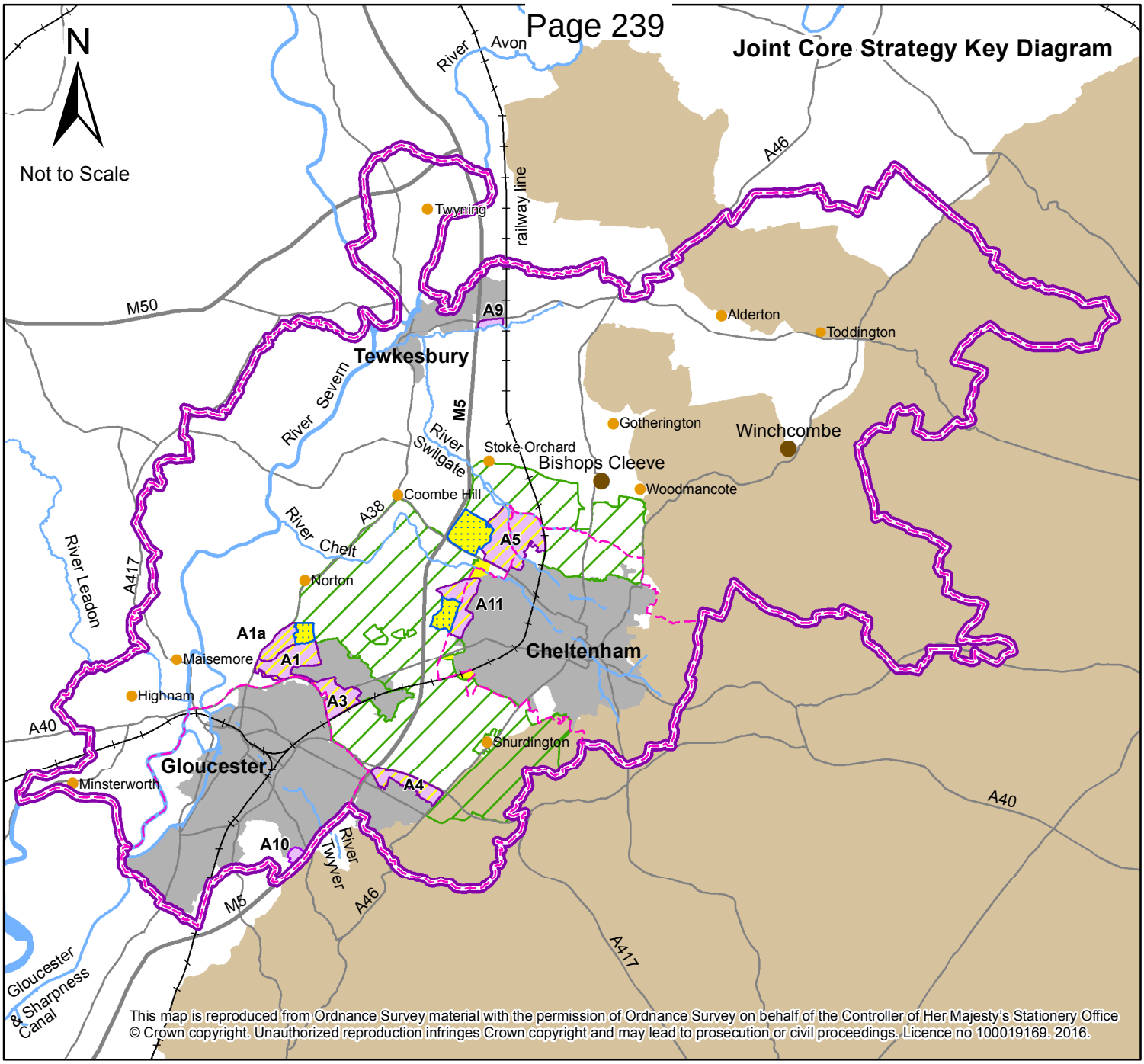
| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | | | | | Reason |
|---|---|---|---|---|---|---|---|
| | | ~~in new developments~~ | ~~provision of public open space~~ | | | | |
| | | ~~Number of Lower Super Output Areas in the 20% most deprived in England and Gloucestershire~~ | ~~To reduce the number of Lower Super Output Areas amongst the 20% most deprived in Gloucestershire and England~~ | ~~South West Observatory, Indices of Deprivation~~ | ~~Annually~~ | | |
| | | Number of essential community facilities lost or gained through the development process | No loss of community facilities | Internal monitoring | Annually | | |
| | | ~~Provision of sporting facilities~~ | ~~Increase sports facilities in the JCS area as a percentage of regional provision: JCS area - 6% in January 2013~~ | ~~Sport England Local Sport Profiles~~ | ~~Annually~~ | | |
| | | ~~Access to green space - % of dwellings *having access to:*~~<br><br>~~*- well-maintained, high- quality and versatile green space within 300 metres*~~<br>~~*- 20ha green space site within 2km*~~ | ~~Maintain and improve the % of dwellings with sufficient access to green space~~ | ~~Internal monitoring~~ | ~~Annually~~ | | |

## JCS Table of Main Modifications

| Proposed Modification Number | Paragraph in Pre-Submission JCS | JCS Pre-Submission original text with track changes | Reason |
|---|---|---|---|
| | | ~~- 100ha green space site within 5km~~<br>~~- 500ha green space site within 10km~~ | |
| PMM0134 | Appendices (Maps) 2, 3, 4, 5, 6, 7 | *SEE APPENDIX 2A*<br>*Update to JCS Appendices Maps 2, 3, 4 and 5*<br>*Removal of JCS Appendices Maps 6 & 7*<br>*Addition of Gloucestershire Nature Map Strategic Nature Areas and City of Gloucester Proposed Primary Shopping Area, Primary Frontage and Secondary Frontage Map* | Updated |
| PMM0135 | Superseded Policies | *SEE APPENDIX 3* | To comply with regulation 8(5) of the Town and Country Planning (Local Planning)(England) Regulations 2012 |

**Appendix 1**



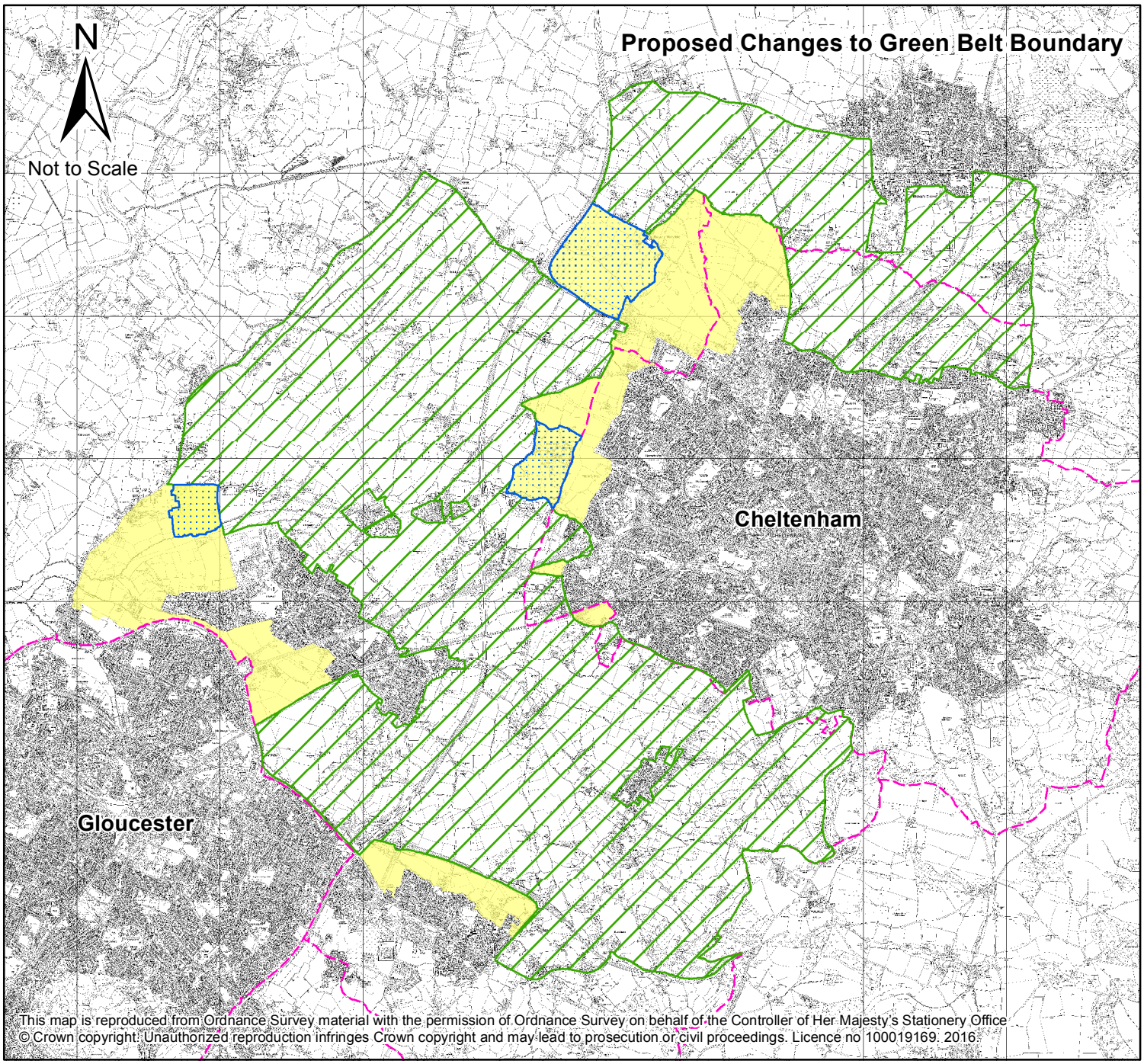



## Key

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

**Appendix 2**





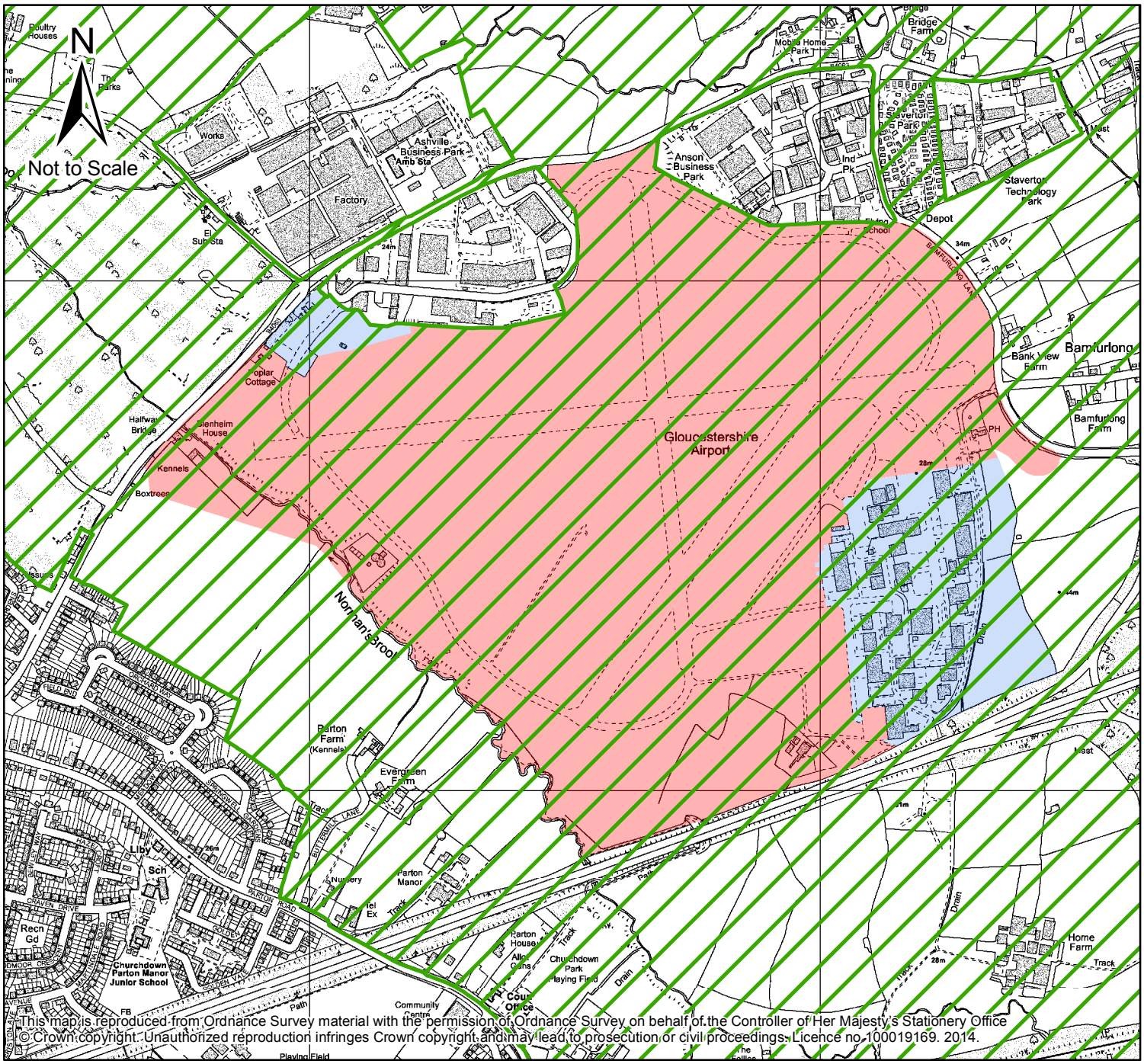

**Key**

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

**Appendix 3**



# 1 - Clarification of Green Belt Boundary at Gloucestershire Airport

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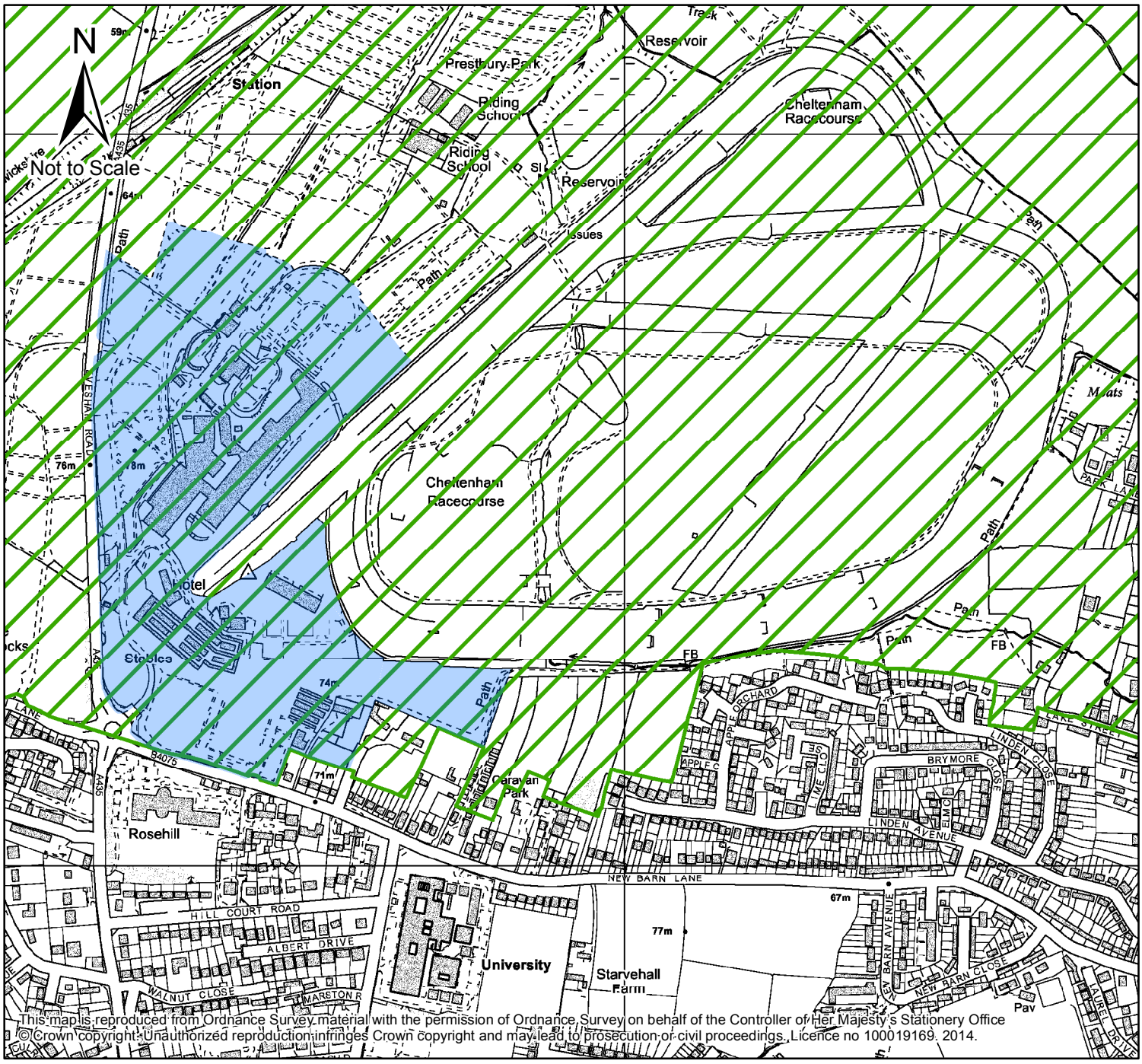
## Key

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

**Appendix 4**

## Inset 2 - Cheltenham Racecourse Policy Area

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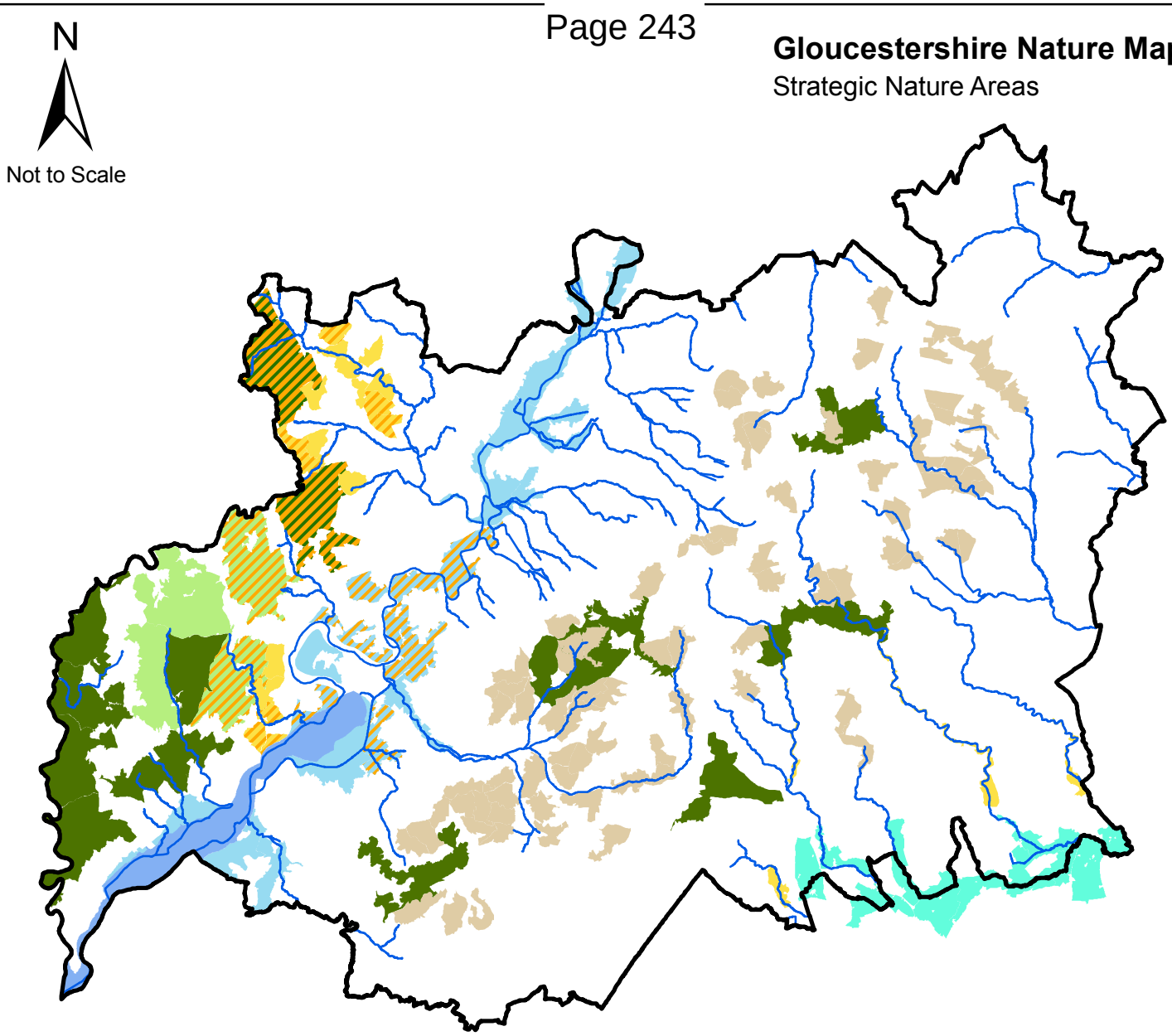
**Key**

- Existing Green Belt Boundary
- Racecourse Policy Area

# Gloucestershire Nature Map

Strategic Nature Areas

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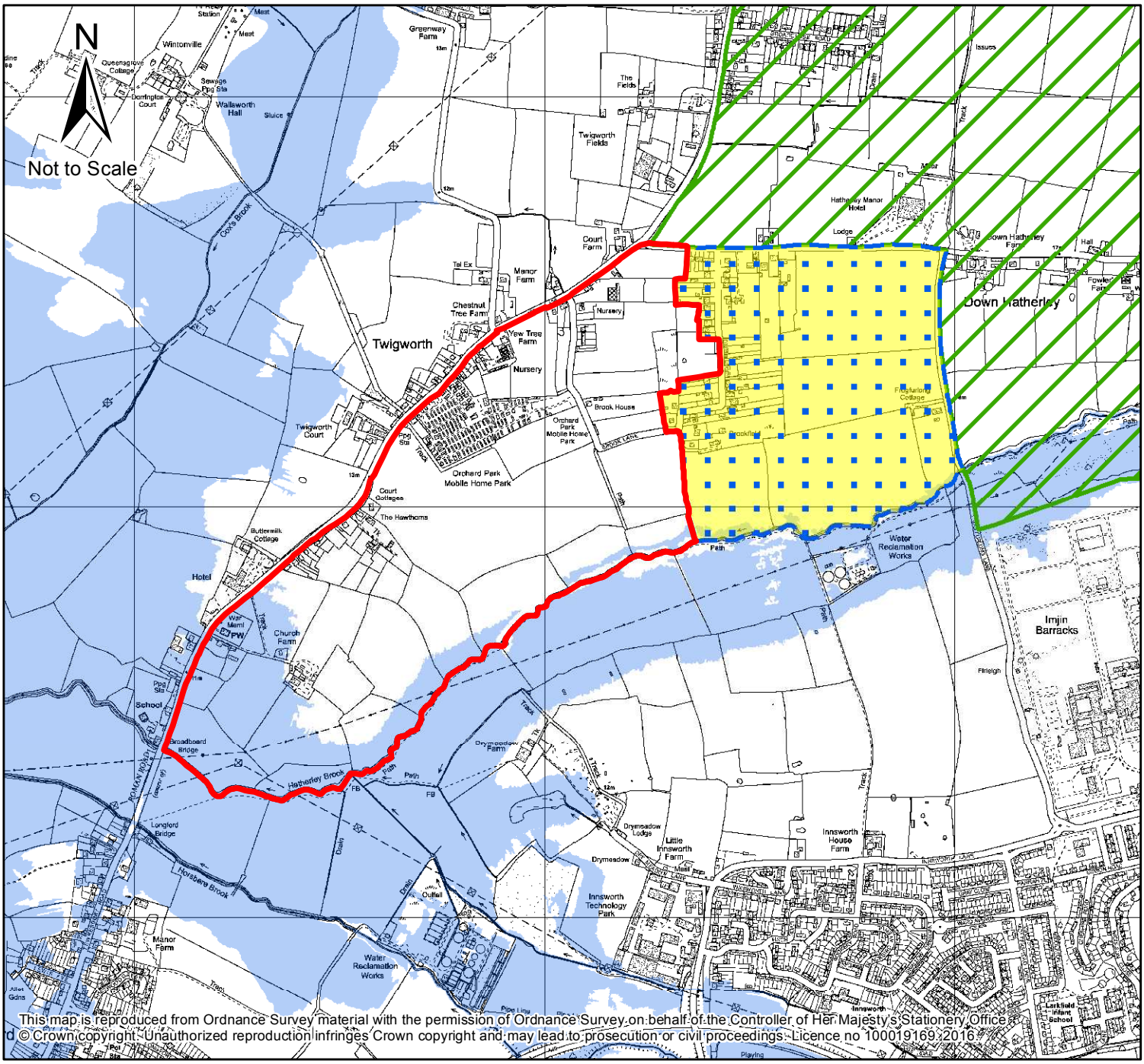
## Key

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

## Joint Core Strategy Strategic Allocations - A1a

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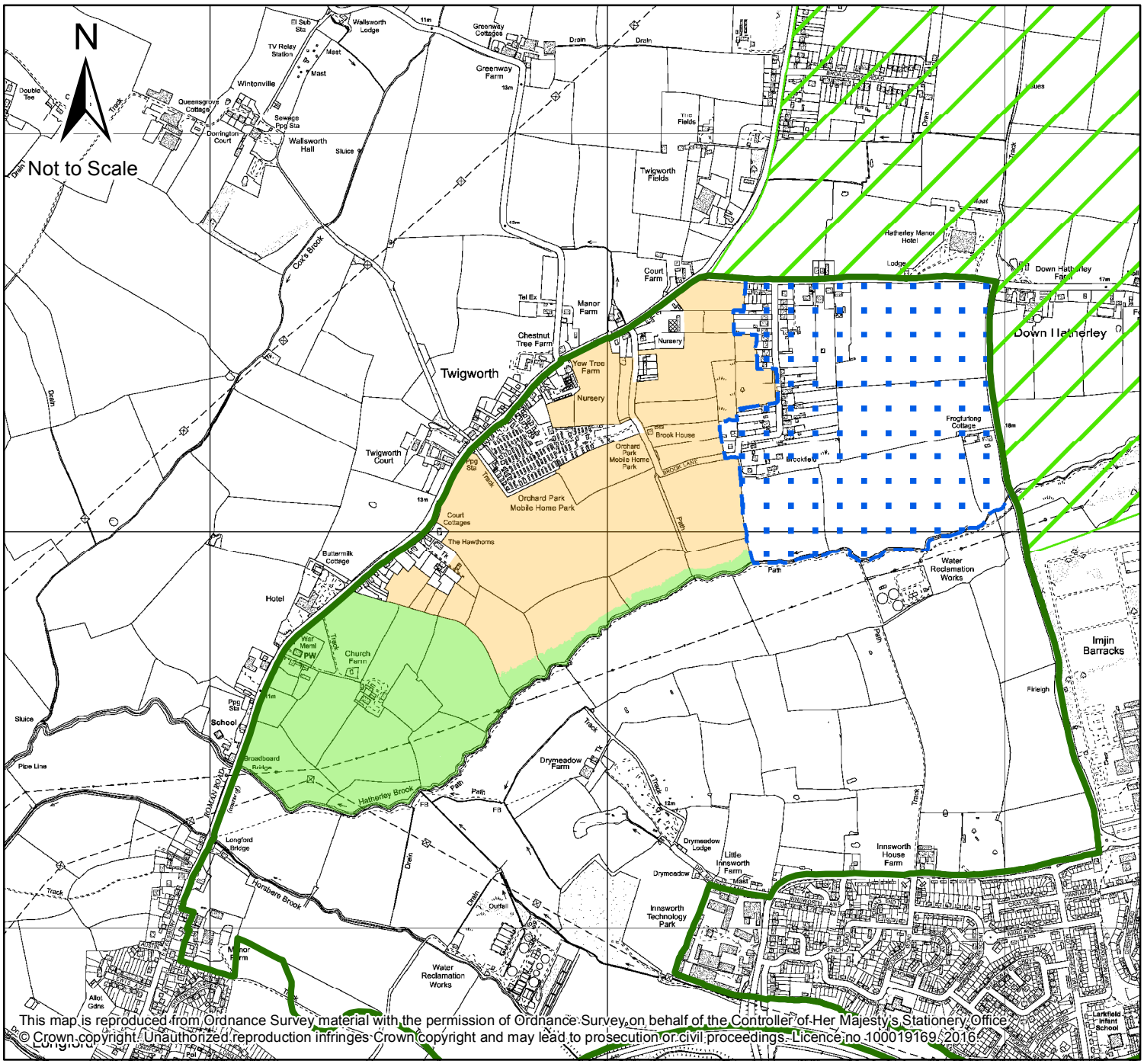
**Key**

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

# Layout A1a -Twigworth Urban Extension

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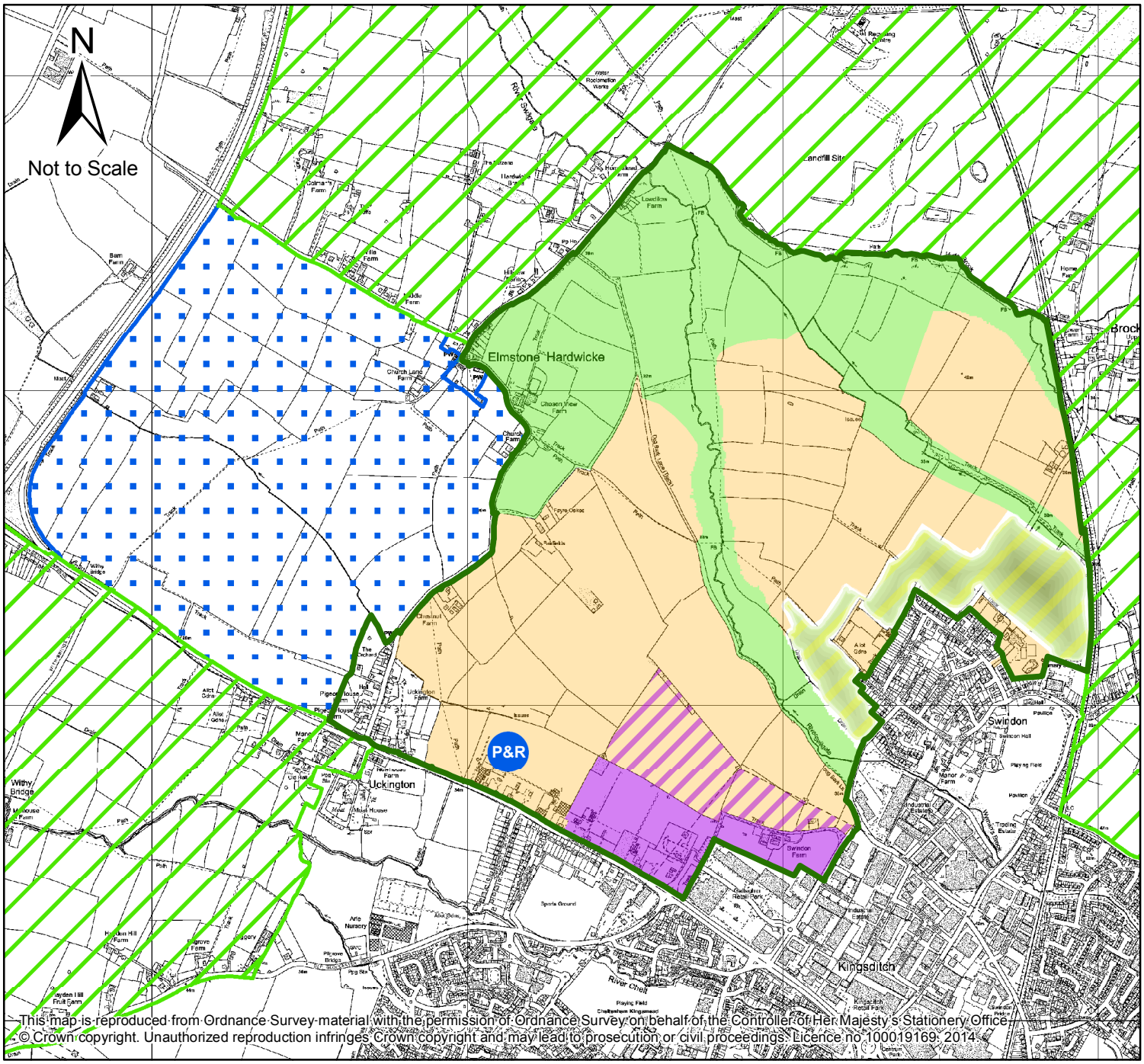
## Key

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

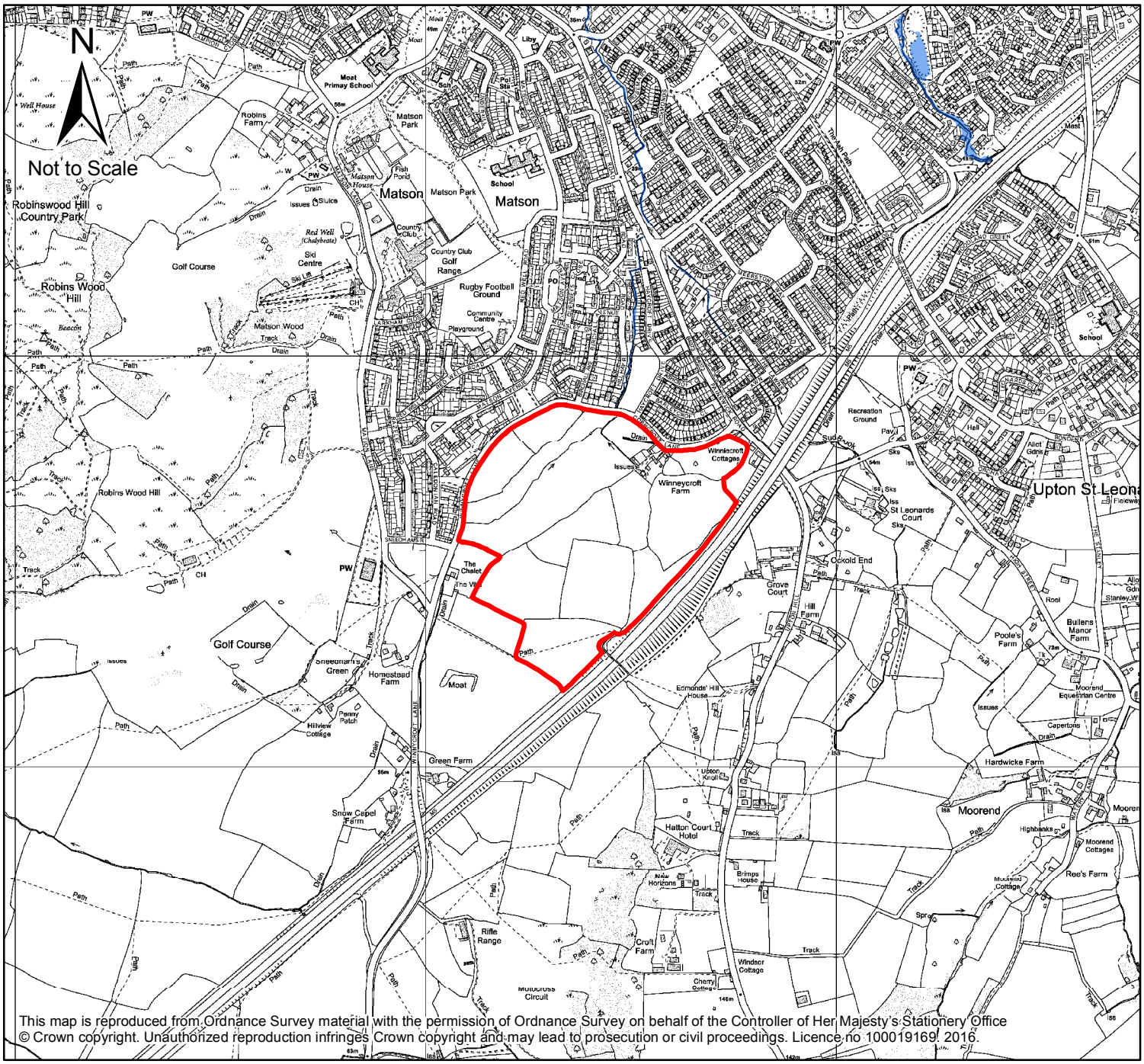
# Indicative Site Layout North West Cheltenham Urban Extension




## Key

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

**Joint Core Strategy Strategic Allocations A10**

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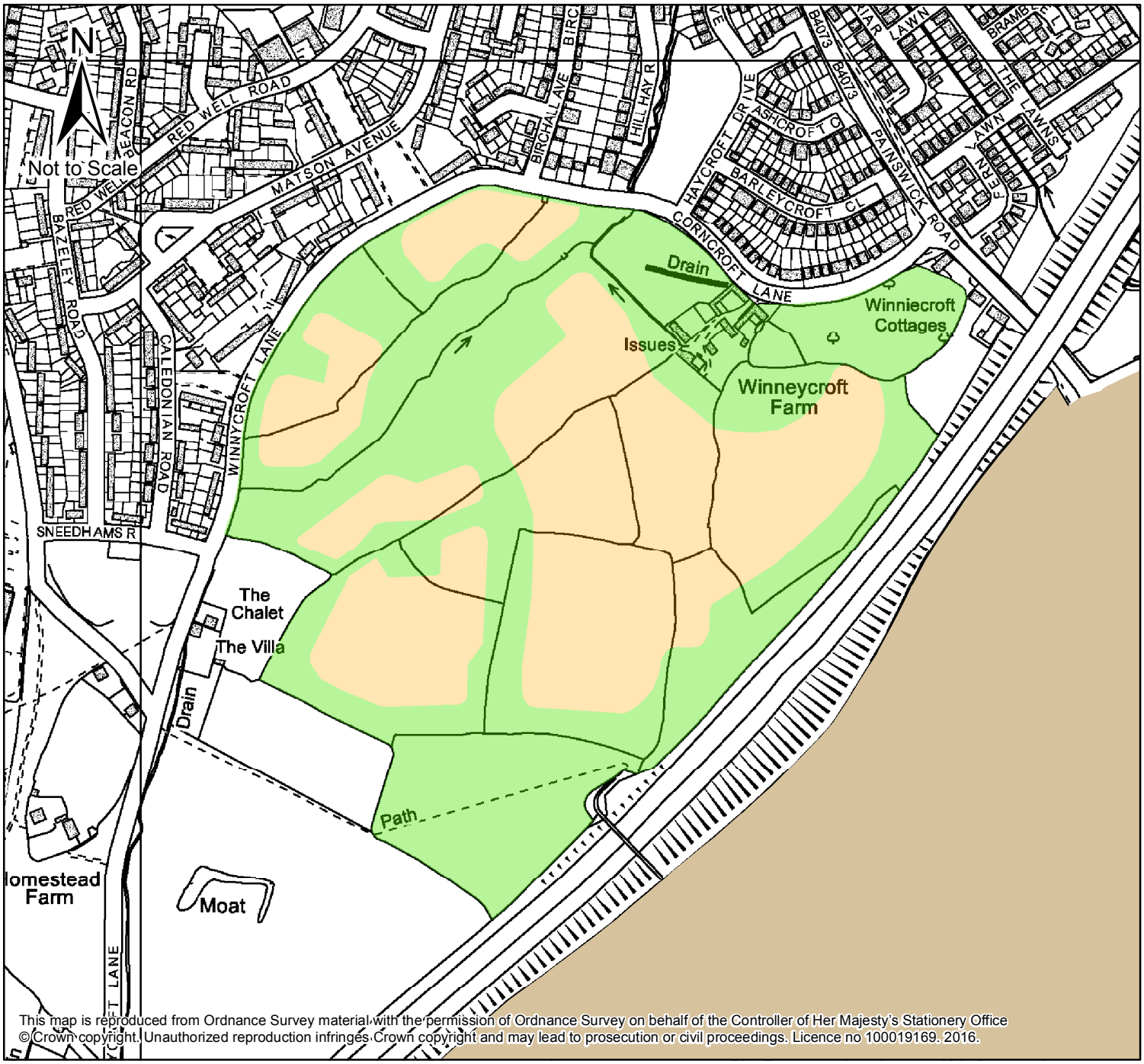
**Key**

Allocated Site Boundary

Floodzone 3

# Indicative Site Layout 10 - Winnycroft

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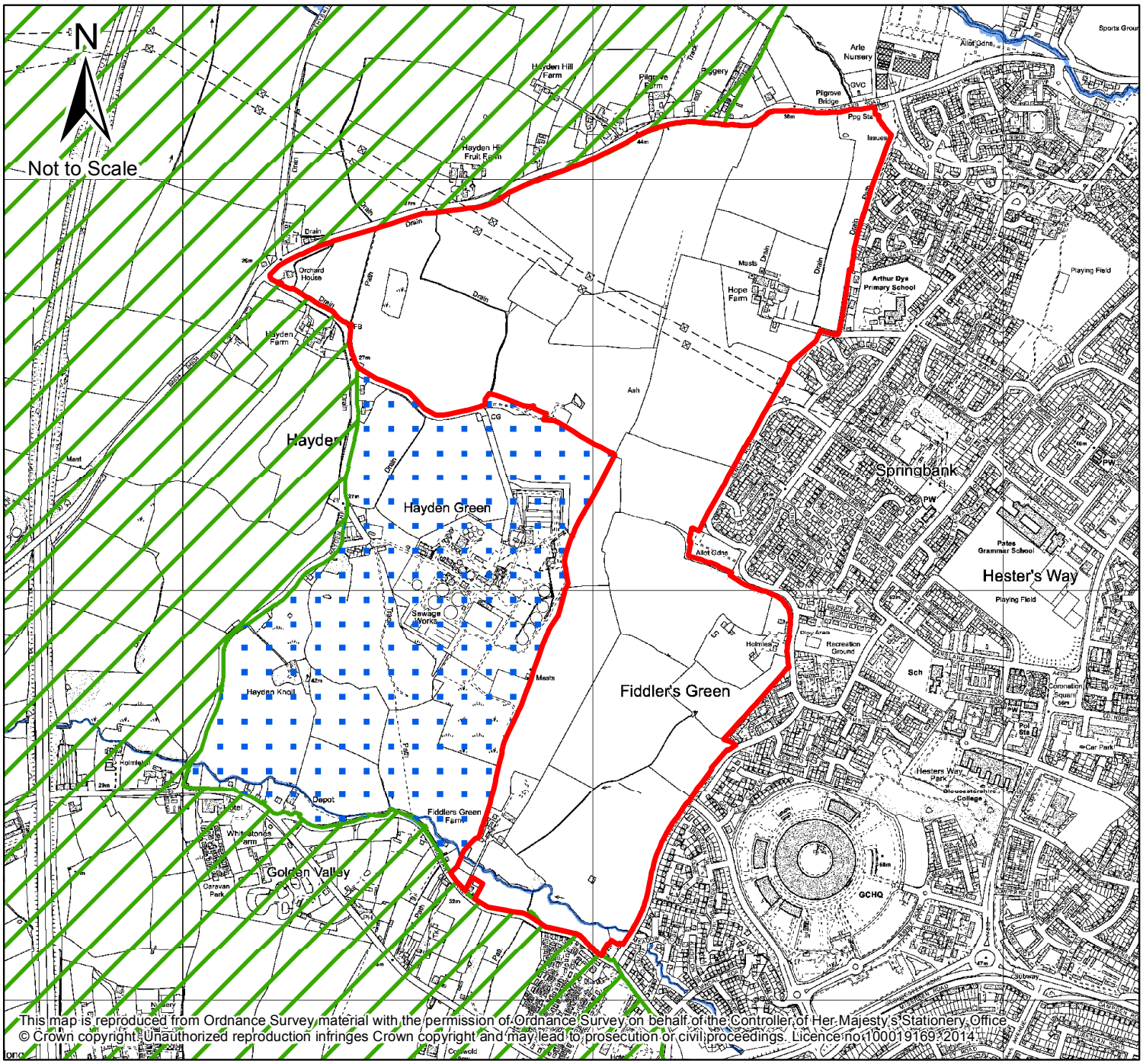
## Key

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

## Joint Core Strategy Strategic Allocations A11

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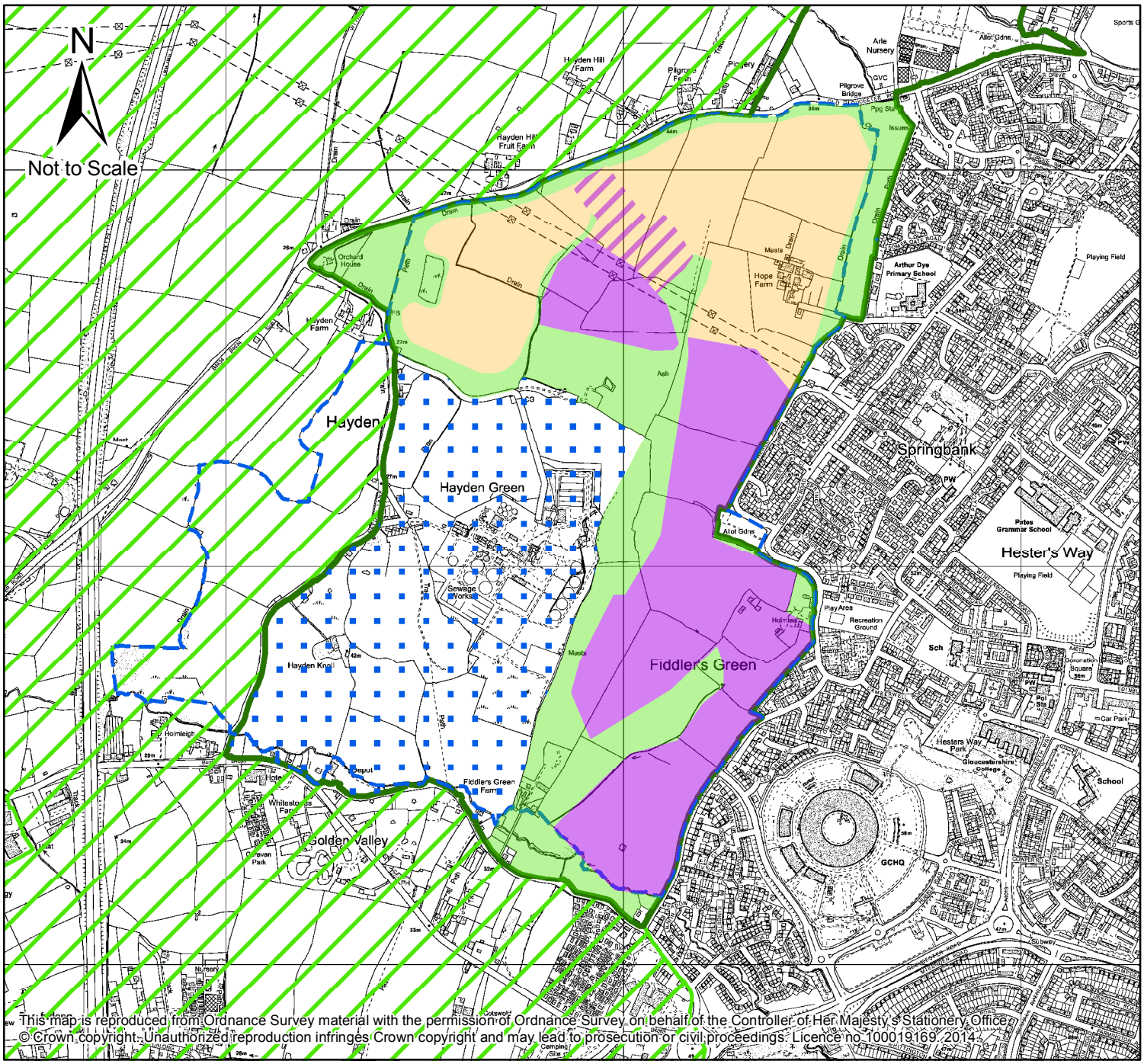
**Key**

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

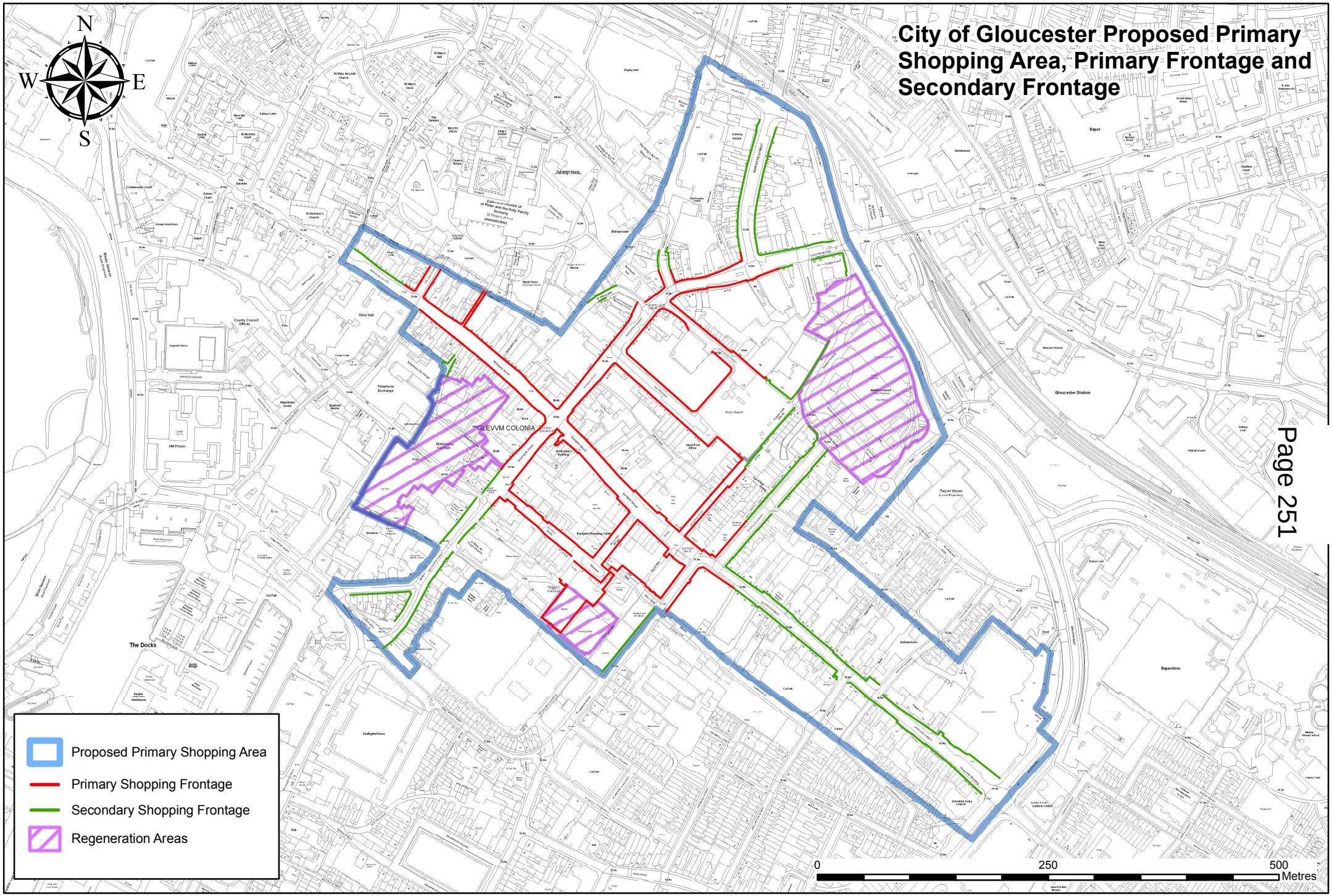
 **icative Site Layout 11 - West Cheltenham**




## Key

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

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



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**Superseded development plan policies and proposals**

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

**Explanatory note:**

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

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

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

| CBC LP policy ref | Policy heading | JCS Policies to supersede Local Plan Policy |
|---|---|---|
| CP 1 | Sustainable Development | SD11, SD15 |
| CP 2 | Sequential Approach to Location of Development | Local Plan Policy to be saved beyond the adoption of the JCS |
| CP 3 | Sustainable Environment | Local Plan Policy to be saved beyond the adoption of the JCS |
| CP 4 | Safe and Sustainable Living | Local Plan Policy to be saved beyond the adoption of the JCS |
| CP 5 | Sustainable Transport | SD5, INF1 |
| CP 6 | Mixed Use Development | Local Plan Policy to be saved beyond the adoption of the JCS |
| CP 7 | Design | Local Plan Policy to be saved beyond the adoption of the JCS |
| CP 8 | Provision of Necessary Infrastructure and Facilities | INF5, INF7, INF8 |
| PR 1 | Land Allocated for Housing Development | Local Plan Policy to be saved beyond the adoption of the JCS |
| PR 2 | Land Allocated for Mixed Use Development | Local Plan Policy to be saved beyond the adoption of the JCS |
| PR 3 | Land Safeguarded for Transport Schemes | Deleted |
| BE 1 | Open Space in Conservation Areas | Local Plan Policy to be saved beyond the adoption of the JCS |
| BE 2 | Residential Character in Conservation Areas | Local Plan Policy to be saved beyond the adoption of the JCS |
| BE 3 | Demolition in Conservation Areas | Deleted |
| BE 4 | Timing Of Demolition in Conservation Areas | Local Plan Policy to be saved beyond the adoption of the JCS |
| BE 5 | Boundary Enclosures in Conservation Areas | Local Plan Policy to be saved beyond the adoption of the JCS |
| BE 6 | Back Lanes in Conservation Areas | Local Plan Policy to be saved beyond the adoption of the JCS |
| BE 7 | Parking on Forecourts or Front Gardens in Conservation Areas | Local Plan Policy to be saved beyond the adoption of the JCS |
| BE 8 | Demolition of Listed Buildings | Deleted |

| | | |
|---|---|---|
| BE 9 | Alteration of Listed Buildings | Deleted |
| BE 10 | Boundary Enclosures to Listed Buildings | Local Plan Policy to be saved beyond the adoption of the JCS |
| BE 11 | Buildings of Local Importance | Local Plan Policy to be saved beyond the adoption of the JCS |
| BE 12 | Advertisements and Signs | Deleted |
| BE 13 | Advertisements and Signs in Conservation Areas | Local Plan Policy to be saved beyond the adoption of the JCS |
| BE 14 | Advertisement Hoardings in Conservation Areas | Local Plan Policy to be saved beyond the adoption of the JCS |
| BE 15 | Projecting Signs in Conservation Areas | Local Plan Policy to be saved beyond the adoption of the JCS |
| BE 16 | Petrol Filling Stations and Car Sales in Conservation Areas | Local Plan Policy to be saved beyond the adoption of the JCS |
| BE 17 | Advertisements And Signs On Listed Buildings | Local Plan Policy to be saved beyond the adoption of the JCS |
| BE 18 | Design and Landscaping of New Roads | SD5 |
| BE 19 | Nationally Important Archaeological Remains | Local Plan Policy to be saved beyond the adoption of the JCS |
| BE 20 | Archaeological Remains of Local Importance | Local Plan Policy to be saved beyond the adoption of the JCS |
| GE 1 | Public Green Space | Local Plan Policy to be saved beyond the adoption of the JCS |
| GE 2 | Private Green Space | Local Plan Policy to be saved beyond the adoption of the JCS |
| GE 3 | Development Within Extensive Grounds | SD5, SD10, INF4 |
| GE 4 | Pittville Park and Bouncers Lane Cemetery | Local Plan Policy to be saved beyond the adoption of the JCS |
| GE 5 | Protection and Replacement of Trees | Local Plan Policy to be saved beyond the adoption of the JCS |
| GE 6 | Trees And Development | Local Plan Policy to be saved beyond the adoption of the JCS |
| GE 7 | Accommodation and Protection of Natural Features | Local Plan Policy to be saved beyond the adoption of the JCS |
| CO 1 | Landscape Character | SD5, SD7, SD8 |
| CO 2 | Development within or affecting the AONB | SD8 |
| CO 3 | Rebuilding or Replacement of Buildings in the AONB | SD8 |
| CO 4 | Extension of Buildings in the AONB | Local Plan Policy to be saved beyond the adoption of the JCS |
| CO 5 | Definition of Green Belt | SD6 |
| CO 6 | Development in the Green Belt | SD6, SD11 |
| CO 7 | Rebuilding or Replacement of Dwellings in the Green Belt | Local Plan Policy to be saved beyond the adoption of the JCS |
| CO 8 | Extension of Dwellings in the Green Belt | Deleted |
| CO 9 | Development at Cheltenham Racecourse | SD6 |
| CO 10 | Agricultural Land | SD15 |
| CO 11 | Agricultural and Forestry Dwellings | Local Plan Policy to be saved beyond the adoption of the JCS |
| CO 12 | Farm Diversification Projects | SD2, SD5, SD7, |
| CO 13 | Conversion of Rural Buildings | Local Plan Policy to be saved beyond the adoption of the JCS |
| CO 14 | Development Abutting the Countryside | SD5, SD7 |
| NE 1 | Habitats of Legally Protected Species | SD10 |
| NE 2 | Designated Nature Conservation Sites | SD10 |
| NE 3 | Biodiversity and Geodiversity of Local Importance | SD10 |
| NE 4 | Contaminated Land | SD15 |

| | | |
|---|---|---|
| EM 1 | Employment Uses | SD2 |
| EM 2 | Safeguarding of Employment Land | Local Plan Policy to be saved beyond the adoption of the JCS |
| HS 1 | Housing Development | SD11 |
| HS 2 | Housing Density | SD11 |
| HS 3 | Sub-Division of Existing Dwellings | SD5 |
| HS 4 | Affordable Housing | SD13 |
| HS 5 | Mixed Communities | SD12 |
| HS 6 | Elderly Persons Housing | SD12 |
| HS 7 | Loss of Residential Accommodation | Deleted |
| HS 8 | Houses in Multiple Occupation | Deleted |
| RT 1 | Location of Retail Development | Local Plan Policy to be saved beyond the adoption of the JCS |
| RT 2 | Retail Development in the Core Commercial Area | Local Plan Policy to be saved beyond the adoption of the JCS |
| RT 3 | Non-A1 Uses in Primary Shopping Frontages | Local Plan Policy to be saved beyond the adoption of the JCS |
| RT 4 | Retail Development in Local Shopping Centres | Local Plan Policy to be saved beyond the adoption of the JCS |
| RT 5 | Non A1 Uses In Local Shopping Centres | Local Plan Policy to be saved beyond the adoption of the JCS |
| RT 6 | New Local Shopping Centres | Deleted |
| RT 7 | Retail Development in Out of Centre Locations | Deleted |
| RT 8 | Individual Convenience Shops | Local Plan Policy to be saved beyond the adoption of the JCS |
| RT 9 | Car Sales | Local Plan Policy to be saved beyond the adoption of the JCS |
| RT 10 | Access to Upper Floors of Commercial Premises | Local Plan Policy to be saved beyond the adoption of the JCS |
| RC 1 | Existing Community Facilities | INF5 |
| RC 2 | Youth and Adult Outdoor Playing Facilities | Local Plan Policy to be saved beyond the adoption of the JCS |
| RC 3 | Outdoor Playing Facilities in Educational Use | INF5 |
| RC 4 | Casual Play Space | Local Plan Policy to be saved beyond the adoption of the JCS |
| RC 5 | Development of Amenity Space | Local Plan Policy to be saved beyond the adoption of the JCS |
| RC 6 | Play Space in Residential Development | Local Plan Policy to be saved beyond the adoption of the JCS |
| RC 7 | Amenity Space in Housing Developments | Local Plan Policy to be saved beyond the adoption of the JCS |
| RC 8 | New Public Green Space | Local Plan Policy to be saved beyond the adoption of the JCS |
| RC 9 | Honeybourne Line Footpath/Cycleway | Local Plan Policy to be saved beyond the adoption of the JCS |
| RC 10 | Allotments | Local Plan Policy to be saved beyond the adoption of the JCS |
| RC 11 | Recreation and Sport in the Countryside | SD6, SD7, SD8 |
| RC 12 | Golf Courses | SD6, SD7, SD8 |
| RC 13 | Public Rights of Way in the Countryside | INF4 |
| UI 1 | Development in Flood Zones | INF3 |
| UI 2 | Development and Flooding | INF3 |
| UI 3 | Sustainable Drainage Systems | INF3 |
| UI 4 | Maintenance Strips for Watercourses | Local Plan Policy to be saved beyond the adoption of the JCS |
| UI 5 | Culverting of Watercourses | INF3 |

| | | |
|---|---|---|
| UI 6 | Development Near Sewage Treatment Works | SD6 |
| UI 7 | Renewable Energy | SD4, SD5, SD15, INF6 |
| UI 8 | Telecommunications Installations | INF7, SD15 |
| TP 1 | Development and Highway Safety | SD5, INF1, INF2 |
| TP 2 | Highway Standards | SD5, INF1, INF2 |
| TP 3 | Servicing of Shopping Facilities | Deleted |
| TP 4 | Long-Stay Car Parking | Local Plan Policy to be saved beyond the adoption of the JCS |
| TP 5 | Extension of Private Car Parking Facilities | Deleted |
| TP 6 | Parking Provision In Development | Deleted |

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

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

| POLICY REF | TITLE | SUPERSEDED BY JCS? YES/NO | SUPERSEDING JCS POLICY /POLICIES |
|---|---|---|---|
| GNL2 | DESIGN REQUIREMENTS FOR MAJOR DEVELOPMENT PROPOSALS | YES | SD5 |
| GNL6 | PROVISION FOR ART. | NO | |
| GNL8 | ENERGY EFFICIENT DEVELOPMENT | YES | SD4 |
| GNL11 | IMPLEMENTATION | YES | INF7<br>INF3 |
| GNL13 | ADVERTISEMENTS | NO | |
| GNL15 | NEW COMMUNITY FACILITIES | YES | INF5 |
| GNL17 | PRE-SCHOOL CHILDCARE FACILITIES | NO | |
| HOU1 | HOUSING ALLOCATIONS | NO | |
| HOU2 | LARGER SETTLEMENTS CONTAINING A PRIMARY LEVEL OF COMMUNITY FACILITIES AND SERVICES | YES | SP2<br>SD11 |
| HOU3 | OTHER VILLAGES (INFILLING ONLY) | YES | SP2<br>SD11 |
| HOU4 | OTHER SETTLEMENTS/RURAL AREAS | YES | SP2<br>SD11 |
| HOU5 | NEW HOUSING DEVELOPMENT WITHIN EXISTING RESIDENTIAL AREAS | YES | SP2<br>SD11 |
| HOU6 | REFURBISHMENT OF EXISTING DWELLINGS | NO | |
| HOU7 | REPLACEMENT DWELLINGS | NO | |
| HOU8 | DOMESTIC EXTENSIONS | NO | |
| HOU9 | CONVERSIONS / SUB-DIVISION | NO | |
| HOU10 | CHANGE OF USE OF AGRICULTURAL LAND TO RESIDENTIAL CURTILAGE | NO | |
| HOU11 | ELDERLY PERSONS' ACCOMMODATION (INDEPENDENT UNITS)/ SPECIAL NEEDS HOUSING | YES | SD 12 |
| HOU12 | MOBILE HOMES | NO | |
| HOU13 | AFFORDABLE HOUSING | YES | SD13 |
| HOU14 | AFFORDABLE HOUSING (EXCEPTIONS SCHEMES) | YES | SD13 |
| HOU16 | MINSTERWORTH TRAVELLERS' SITES | NO | |
| GRB1 | GREEN BELT | YES | SD6 |
| EMP1 | MAJOR EMPLOYMENT SITES | NO | |
| EMP2 | EMPLOYMENT USES WITHIN | NO | |

| | | | |
|---|---|---|---|
| | SETTLEMENTS OUTSIDE ALLOCATED SITES | | |
| EMP3 | RURAL BUSINESS CENTRES | NO | |
| EMP4 | RURAL EMPLOYMENT POLICY | YES | SD2 |
| EMP5 | EXISTING EMPLOYMENT USES OUTSIDE SETTLEMENTS, ALLOCATED SITES AND RURAL BUSINESS CENTRES | YES | SD2 |
| TPT1 | ACCESS FOR DEVELOPMENT | YES | INF1 |
| TPT3 | PEDESTRIAN NETWORKS | NO | |
| TPT5 | CYCLE NETWORK ENHANCEMENT | NO | |
| TPT6 | CYCLE PARKING | NO | |
| TPT8 | PARK AND RIDE PROVISION | NO | |
| TPT9 | PUBLIC TRANSPORT CORRIDORS | NO | |
| TPT10 | RAILWAY STATIONS | NO | |
| TPT11 | SUPPORT FOR RESTORATION OF GLOUCESTERSHIRE WARWICKSHIRE RAILWAY | NO | |
| TPT13 | M5 JUNCTION 9 TO A46 ASTON CROSS | NO | |
| TPT14 | TEWKESBURY NORTHERN BYPASS CORRIDOR PROTECTION | NO | |
| TPT16 | NEW PETROL FILLING STATIONS | NO | |
| TPT18 | PROTECTION OF POTENTIAL FREIGHT RAILHEADS | YES | SA1 |
| HEN2 | CONSERVATION AREA: SETTING AND IMPACT | NO | |
| HEN6 | SHOPFRONTS IN CONSERVATION AREAS | NO | |
| HEN7 | BLINDS AND CANOPIES IN CONSERVATION AREAS | NO | |
| HEN17 | ADVERTISEMENTS ON LISTED BUILDINGS | NO | |
| HEN24 | HISTORIC BATTLEFIELDS | NO | |
| EVT1 | ENERGY | YES | INF6 |
| EVT2 | LIGHT POLLUTION | YES | SD15 |
| EVT3 | NOISE POLLUTION | YES | SD15 |
| EVT5 | DEVELOPMENT IN HIGH, AND LOW TO MEDIUM FLOOD RISK AREAS | YES | INF3 |
| EVT8 | DEVELOPMENT NEAR SEWAGE TREATMENT WORKS | NO | |
| EVT9 | SUSTAINABLE URBAN DRAINAGE SYSTEMS | YES | INF3 |
| LND2 | SPECIAL LANDSCAPE AREA (SLA) | NO | |
| LND3 | LANDSCAPE PROTECTION ZONE (LPZ) | NO | |
| LND4 | LANDSCAPE - COUNTRYSIDE PROTECTION | YES | SD7 |
| LND5 | IMPORTANT OPEN SPACES | NO | |
| LND6 | HISTORIC PARKS AND GARDENS | NO | |
| LND7 | LANDSCAPING OF NEW DEVELOPMENTS | YES | INF4<br>SD7<br>SD5 |
| TOR1 | GENERAL POLICY | NO | |
| TOR2 | SERVICED / SELF CATERING ACCOMMODATION | NO | |
| TOR4 | NEW STATIC CARAVAN / LOG CABIN / | NO | |

| | | | |
|---|---|---|---|
| | CHALET SITES | | |
| TOR5 | TOURING CARAVAN AND CAMPING SITES | NO | |
| TOR6 | EXTENSIONS TO EXISTING CARAVAN / CAMP SITES | NO | |
| TOR7 | FARM DIVERSIFICATION | YES | SD2 |
| TOR9 | HEREFORDSHIRE AND GLOUCESTERSHIRE CANAL | NO | |
| RET1 | TEWKESBURY TOWN CENTRE PRIMARY SHOPPING FRONTAGES | NO | |
| RET2 | TEWKESBURY TOWN CENTRE MIXED USE FRONTAGES | NO | |
| RET3 | RETAIL AREAS | NO | |
| RET4 | NEW LOCAL FACILITIES | NO | |
| RET5 | VILLAGE SHOPS AND PUBLIC HOUSES | NO | |
| RET6 | NEW RETAIL PROPOSALS | YES | SD3 |
| RET8 | GARDEN CENTRES | NO | |
| RET9 | FARMSHOPS / PICK-YOUR-OWN | YES | SD2 |
| RCN1 | OUTDOOR PLAYING SPACE | NO | |
| RCN2 | PROVISION OF SPORTS FACILITIES | NO | |
| RCN3 | NEW ARTS, ENTERTAINMENT AND LEISURE FACILITIES | YES | INF5<br>SD3 |
| RCN4 | RECREATION IN AONB /SLA /LPZ | NO | |
| RCN6 | HORSE RIDING FACILITIES | NO | |
| RCN7 | GOLF COURSES AND DRIVING RANGES | NO | |
| RCN8 | RECREATIONAL AND COMMERCIAL USE OF PONDS AND LAKES | NO | |
| RCN9 | NOISE NUISANCE CAUSED BY SPORTS IN THE COUNTRYSIDE | YES | SD15 |
| RCN10 | ALLOTMENTS | NO | |
| NCN3 | PROTECTION OF OTHER SITES OF NATURE CONSERVATION OR GEOLOGICAL / GEOMORPHOLOGICAL INTEREST | NO | |
| NCN5 | PROTECTION OF IMPORTANT NATURAL FEATURES / BIODIVERSITY | YES | SD10 |
| NCN6 | NEW AND RESTORED PONDS | NO | |
| AGR2 | AGRICULTURAL DWELLINGS | NO | |
| AGR3 | REMOVAL OF AGRICULTURAL WORKERS' OCCUPANCY CONDITIONS | NO | |
| AGR4 | AGRICULTURAL DIVERSIFICATION | YES | SD2 |
| AGR5 | NEW AGRICULTURAL BUILDINGS | NO | |
| AGR6 | RE-USE AND ADAPTATION OF RURAL BUILDINGS – GENERAL | NO | |
| AGR7 | RE-USE AND ADAPTATION OF RURAL BUILDINGS – RETENTION OF CHARACTER | NO | SD11 |
| | **LOCAL POLICIES** | | |
| AC1 | LAND ADJACENT TO RAILWAY AT NORTHWAY LANE, NORTHWAY | NO | |
| AC3 | COWFIELD FARM SOUTH | NO | |
| BI1 | GILDERS CORNER | NO | |
| BI2 | NORTH OF DEAN FARM, BISHOPS | NO | |

| | | | |
|---|---|---|---|
| | CLEEVE | | |
| BI3 | MALVERN VIEW, BISHOPS CLEEVE | NO | |
| BI4 | CLEEVE BUSINESS PARK, BISHOPS CLEEVE | NO | |
| BR1 | BROCKWORTH AND HUCCLECOTE HOUSING SITES | NO | |
| BR2 | GLOUCESTER BUSINESS PARK | NO | |
| BR3 | BROCKWORTH / HUCCLECOTE DISTRICT CENTRE | NO | |
| BR5 | MILL LANE, BROCKWORTH | NO | |
| BR6 | KENNEL LANE, BROCKWORTH | NO | |
| CH1 | SOUTH EAST CAMP | YES | SD6 |
| CH2 | GLOUCESTERSHIRE AIRPORT | YES | SD6 |
| CH3 | ST JOHN'S AVENUE / PARTON ROAD | NO | |
| HU1 | HUCCLECOTE ROAD, HUCCLECOTE | NO | |
| SD1 | HILLVIEW NURSERIES, SHURDINGTON | NO | |
| SD2 | FARM LANE / LECKHAMPTON LANE, SHURDINGTON | YES | SP2<br>SA1 |
| SO1 | NOVERTON LANE/MILL LANE, SOUTHAM | NO | |
| TY1 | ACCESS TO THE RIVER NETWORK | NO | |
| TY2 | LAND EAST OF PRIORS PARK | NO | |
| TY3 | BISHOPS WALK / SPRING GARDENS | NO | |
| TY4 | OLDBURY EMPLOYMENT SITE | NO | |
| TY5 | BREDON ROAD, TEWKESBURY | NO | |
| TY6 | TEWKESBURY – BACK OF MAIN STREETS | NO | |
| TY7 | OLD RAILWAY LINE, TEWKESBURY | NO | |
| UC1 | BARBRIDGE NURSERIES, UCKINGTON | NO | |

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

| Local Plan Policy | Superseded by JCS ? Yes/ No/ Partial | Superseding JCS policy |
|---|---|---|
| Introduction | No | |
| Objectives | No | |
| Finance | No | |
| Employment policies | No | |
| E.1 Release of industrial land sufficient for 5 years requirement | No | |
| E.2 Release of office development sufficient to cater for 5 years requirement | No | |
| H.1 – Release of land for residential development to cater for 5 years requirement | No | |
| H1c – Provision of additional housing sites to those identified in H1a will be encouraged in the city centre | No | |
| H1e – Density and quality of housing development | No | |
| H3 – Preservation and revitalization of older housing stock | No | |
| H4 Housing provision for those whose needs are not met by the private sector | Yes | SD12 |
| H4.b Provision of grants for adaptation of homes for the registered disabled | No | |
| A1.a Heights of buildings and protection of views | No | |
| A2 Particular regard will be given to the city's heritage in terms of archaeological remains, listed buildings and conservation areas | No | |
| A2.d Demolition of listed buildings in conservation areas | No | |
| A3.a Investigation and resolution of environmental problems caused by traffic on Bristol Road and Barton Street | No | |
| A.4e – Development on or around Robinswood Hill will not be permitted except where there are exceptional | No | |

| Local Plan Policy | Superseded by JCS ? Yes/ No/ Partial | Superseding JCS policy |
|---|---|---|
| circumstances | | |
| A.5a – The inclusion of tourist related uses within the comprehensive redevelopment of the Docks area will be encouraged. | No | |
| A.5c – Conservation and maintenance of structures and settings of City's historic fabric (various sites) | No | |
| A.5d – Redevelopment of Blackfriars as a tourist attraction | No | |
| A.6a – Provision of coach parking facilitate at Westgate Street and the Docks | No | |
| A7 – Encourage provision of an adequate level and mix of accommodation to satisfy visitor demand | No | |
| A7.a – Provision of appropriate self-catering accommodation. Conference Centre and central area hotels | No | |
| A7.b – Encourage Guest House developments along main radial routes and the city centre | No | |
| T.1.e – Pedestrian priority within traffic management schemes in the main shopping area of the city. | No | |
| T1.f – Pedestrian priority in the city centre outside the main shopping area | No | |
| T2.d - Measures to facilitate rear access servicing | No | |
| T3 – Introduction of traffic regulation and control measures along Bristol Road and Southgate Street | No | |
| T3.a – Access to existing and future industrial premises will be assisted, where necessary, by traffic management and other measures | No | |
| T3.b – Consideration will be given to traffic management along Bristol Road | No | |
| T4.a- Differential charging of short and long stay car parks to discourage inappropriate use | No | |
| T4.k – Provision of car parking at private development in accordance with the Councils car parking standards | No | |

| Local Plan Policy | Superseded by JCS ? Yes/ No/ Partial | Superseding JCS policy |
|---|---|---|
| T5.b – Early introduction of new bus services with new residential development | Yes | INF1, INF7 |
| T6 – Measures will be introduced to encourage cycling | Yes | INF1, INF4, INF7 |
| T6.c – Encourage cyclist-only routes | Yes | INF1, INF4, INF7 |
| S1 – Main and strengthen Gloucester's role as a sub-regional shopping centre and concentrate comparison shopping in the city except in exceptional circumstances | Yes | SD3 |
| S1.a – Major comparison shopping will not usually be permitted outside the main shopping area | Yes | SD3 |
| S1.e – Conversion of shops to other uses at ground floor level will not normally be allowed in the main shopping area | No | |
| S2.b- Major convenience shopping will not usually be permitted outside the main shopping area | No | |
| S3 – Continued provision of shopping facilities to meet local needs outside the City Centre will be encouraged | No | |
| S3.a Neighbourhood shopping facilities will be encouraged and sometimes required in developing residential areas | No | |
| S3.b – The City Council will seek to maintain the existing neighbourhood shopping provision in the City | No | |
| L1 – Retain public open space, provision with new development, and attempt provision where a shortfall has been identified. | No | |
| L.1a- Retain existing areas of public open space | No | |
| L.1c – In new developments new public open space will be provided in accessible, centralised locations. They must be no less than half an acre in size. | No | |
| L.1d – Where public open space already exists or there is a need for recreational facilities other than open space we will consider the provision of alternative leisure facilities at the cost of the developer. | No | |

| Local Plan Policy | Superseded by JCS ? Yes/ No/ Partial | Superseding JCS policy |
|---|---|---|
| L.2b – Seek to provide additional sports facilities on public open space in new developments. | Yes | INF7 |
| L3.c Inclusion of leisure facilities within the docks redevelopment and financial contribution towards the cost of transferring the British Waterways museum to Gloucester | No | |
| L3.d – Maintenance and protection of Robinswood Hill Country Park | No | |

## Appendix 3 Risk Assessment

| The risk | | | | Original risk score (impact x likelihood) | | | Managing risk | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Risk ref. | Risk description | Risk Owner | Date raised | Impact 1-5 | Likeli-hood 1-6 | Score | Control | Action | Deadline | Responsible officer | Transferred to risk register |
| CR33 | If the council does not keep the momentum going with regards to the JCS and move towards adoption this could result in Inappropriate development. It could also lead to other negative consequences such as the intervention in the plan making process by government or the loss of New Homes Bonus. | Tim Atkins | May 2012 | 4 | 4 | 16 | Reduce | Ongoing actions managed by JCS team | Ongoing | Tracey Crews | Corporate Risk |

Note : The JCS programme holds a detailed risk assessment which is managed through Operational Programme Board and Strategic Issues Board

**Explanatory notes**

**Impact** – an assessment of the impact if the risk occurs on a scale of 1-5 (1 being least impact and 5 being major or critical)

**Likelihood** – how likely is it that the risk will occur on a scale of 1-6

(1 being almost impossible, 2 is very low, 3 is low, 4 significant, 5 high and 6 a very high probability)

**Control -** Either: Reduce / Accept / Transfer to 3rd party / Close