



CHELTENHAM

BOROUGH COUNCIL

Notice of a meeting of Council

Monday, 11 December 2017
2.30 pm
Council Chamber - Municipal Offices

Membership	
Councillors:	Klara Sudbury (Chairman), Bernard Fisher (Vice-Chair), Matt Babbage, Paul Baker, Garth Barnes, Ian Bickerton, Nigel Britter, Flo Clucas, Chris Coleman, Mike Collins, Wendy Flynn, Tim Harman, Steve Harvey, Colin Hay, Rowena Hay, Alex Hegenbarth, Karl Hobley, Sandra Holliday, Peter Jeffries, Steve Jordan, Adam Lillywhite, Chris Mason, Helena McCloskey, Paul McCloskey, Andrew McKinlay, Chris Nelson, Tony Oliver, Dennis Parsons, John Payne, Chris Ryder, 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

1.	APOLOGIES	
2.	DECLARATIONS OF INTEREST	
3.	MINUTES OF THE LAST MEETING Minutes of the meeting held on 16 October 2017	(Pages 3 - 30)
4.	COMMUNICATIONS BY THE MAYOR	
5.	COMMUNICATIONS BY THE LEADER OF THE COUNCIL	
6.	TO RECEIVE PETITIONS	
7.	PUBLIC QUESTIONS These must be received no later than 12 noon on Tuesday 5 December 2017.	
8.	MEMBER QUESTIONS These must be received no later than 12 noon on Tuesday 5 December 2017.	

9.	GLOUCESTER, CHELTENHAM AND TEWKESBURY JOINT CORE STRATEGY-ADOPTION REPORT Report of the Leader	(Pages 31 - 418)
10.	THE PRE-SUBMISSION CHELTENHAM PLAN 2011-2031 Report of the Cabinet Member Development and Safety	(Pages 419 - 1000)
11.	RECOMMENDATIONS OF THE INDEPENDENT REMUNERATION PANEL (IRP) REGARDING MEMBERS' SCHEME OF ALLOWANCES Report of the Chief Executive	(Pages 1001 - 1012)
12.	TREASURY MID-TERM REPORT Report of the Cabinet Member Finance	(Pages 1013 - 1028)
13.	LOCAL COUNCIL TAX SUPPORT SCHEME FOR 2018/19 Report of the Cabinet Member Finance	(Pages 1029 - 1034)
14.	COUNCIL TAX PREMIUM ON EMPTY PROPERTIES Report of the Cabinet Member Finance	(Pages 1035 - 1042)
15.	COMMUNITY GOVERNANCE REVIEW Report of the Leader	(Pages 1043 - 1076)
16.	REVISED FINANCING ARRANGEMENTS FOR IMPROVEMENTS TO LEISURE-AT-CHELTENHAM Report of the Cabinet Member Healthy Lifestyles	(Pages 1077 - 1098)
17.	NOTICES OF MOTION	
18.	ANY OTHER ITEM THE MAYOR DETERMINES AS URGENT AND WHICH REQUIRES A DECISION	
19.	LOCAL GOVERNMENT ACT 1972 - EXEMPT INFORMATION Council is recommended to approve the following resolution:- "That in accordance with Section 100A(4) Local Government Act 1972 the public be excluded from the meeting for the remaining agenda items as it is likely that, in view of the nature of the business to be transacted or the nature of the proceedings, if members of the public are present there will be disclosed to them exempt information as defined in paragraph 3, Part (1) Schedule (12A) Local Government Act 1972, namely: Paragraph 3; Information relating to the financial or business affairs of any particular person (including the authority holding that information)	

20.	A PROPERTY ACQUISITION Report of the Cabinet Member Finance	(Pages 1099 - 1110)

Contact Officer: Rosalind Reeves, Democratic Services Manager, 01242 774937
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Pat Pratley
Chief Executive

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Council

**Monday, 16th October, 2017
2.30 - 7.00 pm**

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

Minutes

1. APOLOGIES

Apologies were received from Councillors Holliday, Parsons and Willingham.

2. DECLARATIONS OF INTEREST

Councillor Savage declared an interest in Motion A as a direct employee of Gloucestershire Hospitals NHS Trust. He would withdraw from the Chamber for this item.

3. MINUTES OF THE LAST MEETING

The minutes of the meeting held on 24 July 2017 were approved and signed as a correct record.

4. COMMUNICATIONS BY THE MAYOR

The Mayor informed Members of her engagements since the last Council meeting in July and highlighted the following :

- All Members had now received a copy of a new map of Cheltenham with details of events, festivals and attractions which had been produced in partnership with CBC, the BID and the racecourse;
- The Battle of Britain service held on 17th September had been poorly attended by Councillors and she requested more Councillors to attend next year. She also asked that prompt replies were given to attendance at civic events.
- The Cheltenham Festival of Cycling and OVO Tour of Britain stage finish on Sept 9th had been an excellent event and she congratulated the team of organisers.

- She thanked Councillor Jon Walklett for organising Mayor Fest at the Frog and Fiddle and thanked Cllrs Babbage and Savage for running the Cheltenham half marathon on behalf of her charities.
- She advised that the Mayor's Christmas Carol Concert would take place this year at Cheltenham College on 9th December

5. COMMUNICATIONS BY THE LEADER OF THE COUNCIL

The Leader welcomed the publication of the new map of Cheltenham and informed Members that the Racecourse had distributed approximately 100 000 of these which was a good advertisement for the town.

The Leader informed Members that the publication of the Joint Core Strategy was expected on 1 November and therefore it was likely to be on target for debate and adoption at the Council meeting scheduled for 11 December.

The Leader reported that the new recycling system had been launched that day and he wished to put on record his thanks to those who had been involved in designing it, the crews involved, members of the public and the Cabinet Member Clean and Green Environment.

6. TO RECEIVE PETITIONS

There were none.

7. PUBLIC QUESTIONS

There were none.

8. MEMBER QUESTIONS

1.	Question from Councillor Wilkinson to Cabinet Member Development and Safety, Councillor Andrew McKinlay
	<p>A recent survey for 'Guide dogs for the blind' found that 42% of assistance dog owners were refused by a taxi or PHV driver over a one year period, despite this being a criminal offence under the Equality act 2010.</p> <p>Will the Cabinet Member ensure that all taxi and PHV drivers are aware of the law, and can the council look to introduce a provision for all drivers to undertake disability and equality training when obtaining or renewing their licence?</p> <p>Can these measures be taken as feedback in the current taxi licensing consultation?</p>
	Response from Cabinet Member
	<ul style="list-style-type: none"> • The proposed "three strikes" policy will introduce additional sanctions for CBC licensed drivers who refuse to carry guide dogs and/or make additional charge for it. • The policy consultation is also proposing the introduction of a driver training procedure that will include, among other things, equality training and a follow up assessment. • The consultation includes proposals to make this training mandatory for all new applicants but also for all current drivers of disabled access licensed vehicles.

	<ul style="list-style-type: none"> • <i>The consultation does not however propose the imposition of mandatory disability awareness training all licensed drivers – only those where such training is relevant.</i> • The current mandatory knowledge test that has been taken by all current licensed drivers includes awareness on equality duties relevant to taxi & private hire drivers. • This is supplemented by awareness of equality duties relevant to taxi & private hire drivers through the council's trade newsletter. • The council is also consulting on making changes to the grandfather rights that may see the implementation of a 100% Equalities Act compliant fleet of public hire vehicles. <p>In a supplementary question Councillor Wilkinson requested that the consultation should seek views on whether there should be mandatory disability awareness training for all licensed drivers.</p> <p>The Cabinet Member agreed that this could be included. He added that it was certainly important that the public had their say and help to bring forward taxi services into the 21st century. He encouraged the public to give their views as part of the consultation which would end on 23 December 2017.</p>
2.	Question from Councillor Wilkinson to Cabinet Member Development and Safety, Councillor Andrew McKinlay
	<p>The recent introduction by Gloucestershire County Council of new parking restrictions around Cheltenham Spa station and Lansdown has predictably caused issues with increased commuter parking in nearby areas, including Park ward. Residents report dangerous parking close to corners and on pavements, as well as difficulty finding space for their vehicles and obstructions to buses in an area stretching from Hatherley Court Road to Gratton Road. What representations will this council make to ensure residents in Park ward are consulted by Gloucestershire County Council on future parking arrangements, including the option of a consultation in the affected areas?</p>
	Response from Cabinet Member
	<p>The changes to on-street parking restrictions in the vicinity of Cheltenham Spa station and within Lansdown have now been implemented by GCC following public consultation. Clearly, not everyone is happy with the resulting impacts of the scheme, which did not respond fully to the representations submitted by CBC through the Leader.</p> <p>The influence which the Borough Council can bring to bear is limited and whilst I have been lobbying for greater devolvement of powers to CBC in respect of highway maintenance and on-street parking arrangements, these are currently issues for GCC to reconcile and to scrutinise through its own internal processes.</p> <p>In a supplementary question Councillor Wilkinson noted that there was a Cabinet Member of GCC who was also a member of this council. He requested that he be asked to relay a message to the county council that they needed to come up with an effective parking strategy to cover the whole town which considers the knock-on effects of displacement parking when new schemes</p>

	<p>are introduced.</p> <p>The Cabinet Member acknowledged that displacement parking was an issue. He considered that the problems referred to in the question relating to this particular scheme were down to insufficient consultation by the county council particularly with local businesses and he hoped that in future the county council would be listening more to the views of the public and businesses.</p>
<p>3.</p>	<p>Question from Councillor John Payne to Cabinet Member Development and Safety, Councillor Andrew McKinlay</p>
	<p>Now that Phase 1 of the Cheltenham Transportation Scheme has bedded in, could the Cabinet Member please update the Council on pollution levels in the area around Imperial Square, given that there are no recording devices in Imperial Square.</p>
<p>Response from Cabinet Member</p>	
	<p>Phase 2 of the Cheltenham Transport Plan was completed in spring 2017, and involved allowing 2 way traffic in Imperial Square, outside the Town Hall. Traffic originating in Montpellier was not able to turn right into Imperial Square until Phase 2 was completed, so there wouldn't have been any impact on Imperial Square at all from the Phase 1 works in Albion Street. This two-way scheme wasn't designed specifically to improve air quality. Any such improvements in air quality are incidental, as I understand the scheme was designed to reduce congestion and make easier access to parking for visitors to the town centre, from the direction of Montpellier, in particular, to allow access to the car parks at Rodney Road and Regent Street.</p> <p>If the Council had decided to monitor air quality in Imperial Square this would not have commenced at the opening up of the two-way scheme, as there is a period of "bedding in" (until such time that regular users of the previous one-way system had time to assess whether the two-way scheme had an effect on their regular journeys or whether alternative routes would have been felt necessary).</p> <p>Traffic flows on this stretch of Imperial Square are also likely to be affected by further changes to traffic management in the area, particularly at the junction of St. George's Road and the Promenade. These works are expected to commence in 2018.</p> <p>Officers have assessed there to be very little relevant exposure in Imperial Square, as most of the properties are commercial buildings, and any residential properties are set well back from the road. The Environmental Protection team discussed the layout changes to this road at the beginning of this year when monitoring points were reviewed, knowing that the two-way scheme might have air quality implications. They propose to install a diffusion tube, or other monitoring device, for a 12 month period commencing January 2018 at a place of relevant exposure in Imperial Square.</p> <p>In a supplementary question Councillor Payne considered the pollution levels in Prestbury High Street were high due to the increased traffic arising from developments in Winchcombe. He had been advised that the detectors had been removed because the readings were lower than they had been but he</p>

	<p>was aware that there were 33 areas in Cheltenham with lower readings than Prestbury High Street. On that basis he asked if the detectors could be reinstated and regular monitoring introduced?</p> <p>The Cabinet Member advised that the levels recorded in Prestbury High Street were within the safe limit but he took the point that monitoring needs to be consistent. He could not comment on why the detectors were taken away but he would investigate and provide a written response to Councillor Payne. He added that they were awaiting the 2016/17 data from Defra but the general trend in pollution levels was downwards.</p>
4.	Question from Councillor Chris Ryder to the Cabinet Member Finance, Councillor Rowena Hay
	<p>You have decided to use 'Blanchere Illuminations' to provide new Christmas lighting in some areas within our town, which no doubt many families, shoppers and visitors to Cheltenham will thoroughly enjoy.</p> <p>Could you please inform me if these Illuminations have been purchased outright, hired in on a fixed price, or on a lease hire scheme.</p>
	Response from Cabinet Member
	<p>Following a tender exercise, a 3 year lease arrangement with Blanchere Illuminations has been agreed which will provide a new illuminated display for Christmas 2017. The tender exercise has been led by the Cheltenham BID who have also contributed their own funding.</p> <p>In a supplementary question Councillor Ryder commented that it was a brilliant result but wanted clarification on the cost to the council.</p> <p>The Cabinet Member advised that £34,400 had been transferred from the planned maintenance budget to cover the council's contribution to the cost of the lights.</p>
5.	Question from Councillor Chris Ryder to the Cabinet Member Finance, Councillor Rowena Hay
	<p>If Cheltenham Borough Council Arle Nursery land were to be removed from Green Belt status to a Brown Field site and sold for future development, would this administration consider ring fencing a proportion of the sale monies to go back into providing a decent sized 'holding/working' area for our Gardening team to be able to continue maintaining our Parks & Gardens to the Horticultural Excellence that we have grown accustomed to whether that be working with sustainable plants in the future and/or our vibrant bedding planting that once again has just recently achieved a 'Gold' accolade for Imperial Gardens in the 'Heart of England in Bloom Campaign'.</p>
	Response from Cabinet Member
	<p>The project team are currently looking at alternative council owned sites that would be suitable for this purpose. The business case is looking into a number of options and will factor in the cost of any potential solutions identified.</p> <p>In a supplementary question Councillor Ryder asked if the Cabinet Member would agree that morale of the gardening staff was important and as such a proper replacement working area would be found for them and not just a corner of the depot.</p> <p>The Cabinet Member reassured Councillor Ryder that the staff would not be</p>

	<p>just put in a corner somewhere and with all their equipment this would not be feasible anyway. A suitable venue would be found.</p>
6.	Question from Councillor Bickerton to the Leader, Councillor Jordan
	<p>Having received information from the GCC Head of Education Tim Browne and the Deputy Head at Balcarras School we are told there is a need for a sizeable new through school (years 4 to 16), two forms of primary and six of secondary, totalling 1260 to 1320 pupils. Southern Cheltenham is the search area for the location of this new school. It is of great concern that GCC seem to be deciding the location of the school in isolation given their track record in planning matters, the incompetence demonstrated over the County Incinerator comes to mind. Our concern is the logic of placing another large school close to Bournside School and avoiding putting parents and children into the traffic congestion.</p> <p>Could we have some assurance than CBC Councillors and Planning Officers will be able to have some influence at an early stage in this important decision?</p>
	Response from Cabinet Member
	<p>The Planning Policy team are currently working with the education and property teams of GCC to properly understand the analysis of need for a new secondary and primary school at South Cheltenham and where this could be delivered. We are seeking to ensure that any such development will be fully consulted on and considered within the Cheltenham Plan and a suitable allocation made if required.</p> <p>The policies around the delivery of new schools are complicated. It is likely that any new school would not be delivered by GCC and as such CBC would be the determining authority on any future planning application.</p> <p>In a supplementary question Councillor Bickerton asked to know the names of the officers dealing with this issue.</p> <p>The Leader advised that Tracey Crews was the Lead Officer and he would be happy to supply Councillor Bickerton with details of the other officers involved.</p>
7.	Question from Councillor Bickerton to the Cabinet Member Development and Safety, Councillor McKinlay
	<p>There have been reports of difficulty using the Arle Court Park and Ride due to inability to park. Parking capacity seems to be at the limit. A few questions have indicated possible reasons for the change with the use of free parking by GCHQ staff and the huge BMW regional HQ, plus the changes to the 99 bus service for NHS staff. Is the council aware of the problem and are there any solutions?</p>
	Response from Cabinet Member
	<p>I was not aware of the extent of the issues identified at the Arle Court Park and Ride and the Council does not appear to have received any complaints from the public about this issue.</p> <p>I'm sure that Cllr Bickerton is aware that the Park and Ride facility is operated</p>

	<p>by GCC and it is likely that any concerns would have been directed to them. I am happy to relay any specifically evidenced complaints to colleagues at the county council.</p>
<p>8.</p>	<p>Question from Councillor Bickerton to the Leader, Councillor Jordan</p>
	<p>The Leckhampton Parish Council Neighbourhood Plan is moving forward at a pace with public consultation anticipated this autumn, compliant and in step with the JCS and the Cheltenham Local Plan. One outstanding issue is the highly valued Cheltenham gateway views from the A46 Shurdington Road of Leckhampton Hill, the Cotswold Escarpment and AONB. This was one of the refusal reasons for the Bovis Miller 650 application by the CBC Planning Committee and picked up again at the JCS Examination in Public by Inspector Ord in her Interim Report, ' <i>Additionally, there are important views from the A46 Shurdington Road across the site onto the Cotswolds Hills, the most spectacular being from the junction with Kidnappers Lane</i>^[115]. We are aware of Tewkesbury Council promoting their town as a walking centre, opening up new footpaths and routes around the town to attract visitors, we have the same objectives with a Cheltenham Country Park theme working closely with Miller Homes and CBC Planning Officers. Inspector Ord is currently recommending 200 homes onto the northern fields at Leckhampton with sympathetic development and regard to the high landscape value and sensitivity, but of course there is always pressure on housing numbers and we are considering sacrificing these views to attain increased housing density. The unobstructed views up to Leckhampton Hill and Cleeve Hill have been described as an invitation to visitors but what value do the Council place on this intangible?</p> <p>Could the Leader of the Council please give some guidance on how much importance we as a neighbourhood planning team should attach to these views in our planning policy?</p>
	<p>Response from Cabinet Member</p>
	<p>The preservation of views into and out of the site will be an important part of masterplanning of the location, both at pre-application and as part of the conditions for allocation in the Cheltenham Plan. The appeal inspector's comments on views in regard to the refusal of the 650 scheme, as well as those of JCS inspector will be material considerations when determining any planning proposal or allocation in this area.</p> <p>In a supplementary question, Councillor Bickerton requested that his photographs be included in the minutes for this item.</p> <p>The Leader noted this request.</p> 

	
<p>9.</p>	<p>Question from Councillor Willingham to Cabinet Member Healthy Lifestyles, Councillor Clucas</p>
	<p>Does the Cabinet Member for Healthy Lifestyles share my concerns that the swingeing Conservative cuts to our beloved NHS are leading to treatment choices being made on cost, with cheaper options that may not lead to the best clinical outcomes being preferred over more expensive treatments that can lead to better clinical outcomes?</p>
	<p>Response from Cabinet Member</p>
	<p>Yes</p>
<p>10.</p>	<p>Question from Councillor Nelson to Cabinet Member Clean and Green Environment, Councillor Coleman</p>
	<p>Why is it that we have a bag to recycle cardboard and not another box with a lid? The box would keep the cardboard dry, whereas the bag, with its partial covering, leads to wet cardboard; does that not affect its recycling value?</p>
	<p>Response from Cabinet Member</p>
	<p>As a result of seeing the way in which cardboard is successfully collected in neighbouring and other local authorities, this bag is considered to be an excellent option. A similar type of bag used by the Forest of Dean was displayed at the full briefing to Council as part of the official launch of the new service on 24th July, so opportunities for questions were given to Members there.</p> <p>It's important to keep cardboard separate for the new recycling collections and the bag has a weighted bottom and Velcro flap to keep the worst of the rain out.</p> <p>The bags can be easily stored in one of the recycling boxes when not in use meaning that households with space restrictions can also take part in the collection service.</p> <p>In addition, the value of cardboard isn't dramatically affected by it being wet and the moisture actually helps the compaction equipment on the vehicle meaning that a greater amount of cardboard can be carried compared to when it is dry.</p> <p>In a supplementary question Councillor Nelson asked why the blue recycling bag was not used for general recycling materials which would not be affected by getting wet and put cardboard in the recycling box with a lid so its value would not be diminished.</p> <p>The Cabinet Member advised that the cardboard schemes had been introduced to cope with packaging for flatpack furniture and Amazon and more waste can be fitted in a blue bag than in a green box. He added that there had</p>

	<p>been a large-scale public consultation as part of the development of the new schemes and there had been a Member Seminar in July and he now encouraged Councillor Nelson to get on board with the scheme and what it was trying to achieve.</p>
11.	<p>Question from Councillor Nelson to Cabinet Member Clean and Green Environment, Councillor Coleman</p>
	<p>I have not received any revised calendar (unlike 23,000 other homes across the town) yet my new collection date means it will be 3 weeks before my recycling is collected, encouraging residents to simply put any excess recycling into their rubbish bin. Is that correct or is it another mistake that has yet to be corrected? This problem was never highlighted within the Member's seminar or media stories.</p>
	<p>Response from Cabinet Member</p>
	<p>Not all households have received a revised calendar, only the ones which have been identified as needing to receive the updated version. For all other households the original calendar is accurate and shows the scheduled dates when refuse, recycling and food waste will be collected.</p> <p>Residents like you who are experiencing longer than 2 weeks before their first refuse or recycling collection are being asked to present any side waste in black sacks alongside their refuse bin and additional recycling in cardboard boxes alongside their recycling receptacles and everything will be collected. Households may also choose to take additional refuse or recycling to the Swindon Road Household Recycling Centre if they don't want to wait for the first new collection.</p> <p>In addition, the Council has taken the decision to instruct Ubico to make collections of refuse and recycling in certain areas on Saturday 21st October for the households which are most affected by the change and are having to wait between 22 and 26 days for their first new refuse or recycling collection, which means that the longest any resident will have to wait for their collection will be 3 weeks.</p> <p>The change to the new collection rounds will result in a more efficient service, providing long terms benefits to the council and to our residents. After 27th October, normal collection rounds will resume, with all waste and recycling being collected fortnightly.</p> <p>In a supplementary question Councillor Nelson was concerned about the long wait for some households before their waste and recycling was collected under the new scheme. Since he had raised this question on Tuesday he understood residents had received a further letter on Friday from Councillor Coleman highlighting this problem and saying that an additional collection would now be arranged. That made at least three letters of explanation going out across the town and he asked how many others had been sent out that ward councillors had not been told about?</p> <p>The Cabinet Member advised that the purpose of the route utilisation scheme was to make routes more efficient and ultimately to save council tax payers money. In planning this change it was inevitable that some people may have to wait longer for their collection during the changeover but the advice from</p>

	<p>professionals had been that residents would tolerate this one-off delay. The administration had reviewed the advice and felt that it was not appropriate for Cheltenham residents and it was now affordable to put on an additional collection for those residents affected. Relevant ward members had been briefed and he hoped that all members would support this decision.</p>
12.	Question from Councillor Nelson to Cabinet Member Clean and Green Environment, Councillor Coleman
	<p>You have been keen to lead the introduction of the new recycling scheme, with its seminars, Council debates and multiple media stories. Why then did you not take responsibility for the mistakes in the glossy recycling calendar? As you signed a letter introducing the scheme, why did you not sign the letter explaining the 23,000 errors?</p>
	Response from Cabinet Member
	<p>A whole-scale system re-design of this scale is not the responsibility of or organised by a single individual but is run as a project. The calendar sent out to residents was subject to a number of checks by the project team however regrettably an error in some of the calendar dates was not picked up. Clearly it is regrettable that an error occurred and in the circumstances it was felt important that the letter of apology came from the Chief Executive.</p> <p>In a supplementary question Councillor Nelson asked why the Cabinet Member had not signed the second letter when he had signed the first and the third and suggested that this was because it could have damaged the Cabinet Member's town wide political credibility, an issue of concern for anyone contemplating standing as a member of Parliament for Cheltenham.</p> <p>The Cabinet Member acknowledged there had been a mistake that had been dealt with and he was happy to take responsibility for that as the Cabinet Member. The ExecBoard had decided that the letter should go out in an officer's name and he praised the Chief Executive for putting her name to it.</p>
13.	Question from Councillor Nelson to Cabinet Member Clean and Green Environment, Councillor Coleman
	<p>Will he promise that no decision will be made about the future of our popular seasonal flowers in the centre of town without carrying out a proper public consultation?</p>
	Response from Cabinet Member
	<p>As you are well aware, this Administration is always keen to ensure that the views of all Cheltenham residents are heard.</p> <p>In respect of this project, there have already been a number of consultation events with stakeholders, including a visit to a town where sustainable planting is working very well, as well as two petitions being published on the Council website. We remain absolutely committed to listening to what people say.</p> <p>This issue is a sensitive one and there are residents on both sides of the argument. It is therefore particularly important that everyone contributing to the debate do so with a full understanding of the issue. We as Members have an</p>

	<p>important role to play in ensuring our constituents have access to all of the information and I am sure that as a result of the Members Briefing last week you will now feel able to explain the arguments for and against moving to sustainable planting, particularly the widely acknowledged environmental benefits, to your constituents.</p> <p>You may also agree with me that it would be beneficial for you to signpost constituents who approach you about this issue to the Council's website where further information, together with photographs, can be found.</p> <p>In a supplementary question Councillor Nelson questioned why a full public consultation had not been carried out and asked whether the real reason was because the Cabinet Member recognised the strength of feeling on this matter and his mind was closed to genuine democratic debate and consideration of alternative solutions.</p> <p>The Cabinet Member responded that this was an extraordinary suggestion given the extensive consultation on projects he had been involved in as a Cabinet Member including the crematorium and the Pitville Park Lane scheme. The project would consult fully on the plans for Imperial Gardens and the Long Gardens should there be any recommendations for a change in planting scheme.</p>
<p>14.</p>	<p>Question from Councillor Nelson to the Cabinet Member Finance, Councillor Rowena Hay</p>
	<p>I understand that Bloor Homes sponsored the recent Tour of Britain cycling event in Cheltenham. What form did that sponsorship take and how much money was provided as part of the sponsorship deal?</p>
	<p>Response from Cabinet Member</p>
	<p>All sponsorship opportunities were set out in a brochure published on the Cheltenham Festival of Cycling website:</p> <p>https://cheltenhamcyclingfestival.org.uk/wp-content/uploads/2017/05/TourOfBritain_Cheltenham_Sponsorship_FINAL.pdf</p> <p>Consultants APT Marketing & PR were appointed by CBC to negotiate and contract all sponsorships. The Bloor sponsorship was a value of £45,000 + VAT and provided the following;</p> <ul style="list-style-type: none"> • Local naming rights, (The Bloor Homes Cheltenham Festival of Cycling; incorporating OVO Energy Tour of Britain) • Painted bike adverts • Soft banners • Lamppost pennants • Imperial gardens stand • Goody bag insert • Digital package • Press pack insert • £5,000 allocated to hospitality. <p>In a supplementary question Councillor Nelson was pleased to see the</p>

	<p>success of the event. However he asked the Cabinet Member whether she agreed with him that there were potential conflicts of interest for Members and Officers in the council receiving sponsorship from Bloor Homes whose application to build over 4,000 homes at Elms Park was currently under active consideration by officers? Had this potential risk been assessed?</p> <p>The Cabinet Member welcomed the letter of support from the local MP. She acknowledged her frustration that the Cabinet were criticised for doing nothing but when they stepped out of the box and put on an event such as the Tour of Britain they were criticised for asking local businesses to be a part of it. She reassured members that a private company ATP marketing had been appointed to undertake all the negotiations on sponsorship deals.</p>
	<p>Question from Councillor Nelson to the Cabinet Member Finance, Councillor Rowena Hay</p>
	<p>Have any discussions taken place with developers, agents or any other third party outside the Council about the sale of Arle Nursery?</p>
	<p>Response from Cabinet Member</p>
	<p>The Council has not been in any discussion with any developer, agent or third party regarding a potential sale of Arle Nursery. However, following the comments of the planning inspector and the suggestion that the local plan re-designates the planning classification for Arle Nursery site and two adjoining sites, one in the ownership of the County Council and the other in a private ownership, discussions between the three land owners have taken place so as to best serve the local plan process.</p> <p>Valuation advice has been obtained assuming the planning re-designation of the site is approved in order to support the development of the business case options for planting and the nursery.</p> <p>Initial discussions with Cheltenham Borough Homes as a vehicle for potential housing development have also taken place.</p> <p>In a supplementary question Councillor Nelson suggested that minds were already made up on the seasonal planting scheme as the Cabinet were determined to sell off the nursery.</p> <p>The Cabinet Member reassured members that no decision had been made on the sale of the nursery or on the future planting scheme.</p>
16.	<p>Question from Councillor Harman to Cabinet Member Clean and Green Environment, Councillor Coleman</p>
	<p>Can the Cabinet Member outline the Councils plans for electric or hybrid vehicles in the council's fleet? Will he also consider a strategy to install electric charging points in for example Borough Council owned Car Parks or other locations in Cheltenham?</p>
	<p>Response from Cabinet Member</p>
	<p>CBC has very few fleet vehicles, as most of these are now operated by our partners at Ubico and Cheltenham Borough Homes.</p> <p>Considering the efficiency of new vehicles is already something which is taken</p>

	<p>account of during the procurement process, which also needs to be flexible to ensure that the chosen option is the best fit for the required business need.</p> <p>Cllr Harman will be aware that CBC has already installed four electric vehicle charging points within CBC car parks, two at Town Centre East and two in Regent Arcade.</p> <p>In addition, we have worked with GCC to secure the installation of a further two charging points which are located at the top end of Montpellier street.</p> <p>We will consider the option of installing further charging points as the Cheltenham Parking Strategy is rolled out, but these are not cheap to provide and with improved battery technology, we have been advised by our consultants that it is likely that most vehicle charging will increasingly take place at people's homes.</p> <p>In a supplementary question Councillor Harman asked when the car parking strategy would be available?</p> <p>In response the Cabinet Member advised that this would be in the coming months but he could not give an exact timescale but suggested the New Year would be a suitable target.</p>
<p>17.</p>	<p>Question from Councillor Harman to Cabinet Member Healthy Lifestyles, Councillor Flo Clucas</p>
	<p>In December last year I asked the Cabinet Member if she would consider providing or promoting with partners, a seasonal ice rink which are popular attractions elsewhere. Can she please update the Council on any progress?</p>
	<p>Response from Cabinet Member</p>
	<p>CBC would be keen to help facilitate the installation of a seasonal ice rink as we recognise the value that this would bring to Cheltenham, particularly at Christmas.</p> <ul style="list-style-type: none"> • CBC would need to work with a commercial partner who was prepared to accept the financial risk; CBC alone would not be prepared to accept the financial risks. • The council did begin discussions with a commercial partner last year but this did not come to fruition. • Gloucester is fortunate to have Peel Group that are able to support the popular ice rink at Gloucester Quays. • We will continue to search for a commercial partner and I would be happy to update Cllr. Harman as necessary. <p>In the meantime, we are continuing to make plans for our Christmas Lights switch on 25th November, with new lights and exciting programme of events being delivered in a collaboration between the Council and Cheltenham BID.</p> <p>In a supplementary question Councillor Harman asked the Cabinet member whether she thought it was a good idea in principle?</p>

	<p>The Cabinet Member agreed that it was something she would love to see in Cheltenham and it had been looked at seriously but there were doubts about its economic viability. There was already a rink in Gloucester nearby which required significant levels of funding and another organisation had looked at an ice rink for Cheltenham but rejected it as too expensive.</p>
18.	Question from Councillor Nelson to Cabinet Member Development and Safety, Councillor Andrew McKinlay
	<p>Changes to Oriel Road junctions/lights appear to be causing significant delays of up to 40 minutes for cars leaving Regents Arcade car park. I thought that one of the aims of the Cheltenham Transport Plan (CTP) was to improve access to Regents Car Park? These delays do not bode well for Christmas shoppers or the introduction of the later CTP phases and do not inspire confidence in our council's plans.</p>
	Response from Cabinet Member
	<p>We have been advised by GCC as highways authority that generally phase 2 of the Cheltenham Transport Plan has resulted in no discernible change in traffic flows around the town.</p> <p>As you point out there has been intermittent queuing of traffic egressing from Regent Arcade. This may be a result of the success of this phase in getting vehicles off the network and into the car park, but equally part of the problem of a delayed full implementation.</p> <p>Either way, we and GCC are fully aware of the frustration that this situation is causing and highways colleagues have been undertaking measures to mitigate the impact of this unwanted outcome. GCC are exploring other actions with anticipated implementation before the Christmas period.</p> <p>In a supplementary question Councillor Nelson asked the Cabinet Member how confident he was that a contingency solution would be implemented before the Christmas period.</p> <p>The Cabinet Member was reasonably confident given that he had been given reassurance from his county council colleagues. The latest plan was to put in place a camera to monitor the egress from the car park and automatically trigger a red light at the junction to allow more traffic to exit when there was a build-up.</p>
19.	Question from Councillor Nelson to Cabinet Member Development and Safety, Councillor Andrew McKinlay
	<p>Why has the Cheltenham Transport Plan and the Boots Corner phase been delayed from this Autumn to June 2018? Many residents might fear that this delay, to just after the Borough elections next May, is firm proof that the proposals from will be unpopular, controversial and have an adverse impact on many wards with Lib Dem councillors (such as St Paul's).</p>
	Response from Cabinet Member
	<p>The timing decision rests entirely with GCC as the highways authority, with whom discussions did take place. GCC had concerns over implementation impacting upon race week so determined that June would be more opportune</p>

	<p>for the Boots Corner trial as it also coincides with lower traffic flows. It also allows the implementation of phase 3 in Royal Well and time for monitoring before any Boots Corner trial in line with both TRO and GCC cabinet decisions.</p> <p>If, however, it is a party political rather than practical point being made perhaps you should address your question to GCC and its Conservative administration.</p> <p>In a supplementary question Councillor Nelson advised that at a seminar he had attended recently about how to make traffic free spaces in the centre of towns, it had been suggested quite strongly that the benefit of shared public spaces had been overhyped and there was a danger for vulnerable people. Would the Cabinet Member therefore review plans for Boots Corner and perhaps consider banning all traffic and having a fully pedestrianised town centre?</p> <p>The Cabinet Member acknowledged that shared space needed careful introduction and the success of any scheme depended on limiting the number of vehicles and their speed. In his view vehicles should be limited to a fast walking pace. He could not go into any more detail at this stage due to delays by GCC but he had given his personal backing to the scheme for a long-time and if he had his way it would be happening now.</p>
<p>20.</p>	<p>Question from Councillor Nelson to Cabinet Member Housing, Councillor Peter Jeffries</p>
	<p>Please could he provide an update on Project SOLACE and its multi-agency approach to reduce rough sleeping on our streets.</p>
	<p>Response from Cabinet Member</p>
	<p>The Solace 'go live' date is dependent upon the team leader receiving vetting clearance through the police and CBC's agile teams' moving to the new ground floor delivery hub, where they will be located alongside police colleagues.</p> <p>The council's lead officer for Solace, is presenting an update to O&S on 27th November which will summarise how the implementation is progressing.</p> <p>The council's ASB caseworker continues to work with partners engaging with rough sleepers and people existing on our streets.</p> <p>In a supplementary question Councillor Nelson said he was disappointed that SOLACE had still not been implemented and there were still rough sleepers on the streets with all their inherent problems. Would the Cabinet member be prepared to give this a higher priority?</p> <p>The Cabinet Member reassured members that rough sleeping was a very high priority but there were many strands to the work which the council was undertaking with partners and the introduction of SOLACE was only one part of the jigsaw. He was pleased that Cabinet had taken decisions which had prioritised the needs of homeless people and the council would continue to work with the police on SOLACE but for the police this was one of their many priorities.</p>
<p>21.</p>	<p>Question from Councillor Nelson to Cabinet Member Development,</p>

	Councillor McKinlay
	What cycle lane road improvements have been introduced in Cheltenham over the last 4 years?
	Response from Cabinet Member
	<p>Cycle lanes are the responsibility of GCC as highway authority and they have been asked for an answer to this question. As yet nothing has been received but will be forwarded when it arrives.</p> <p>Councillor Nelson requested that a written response be provided to all members when available.</p>
22	Question from Councillor Nelson to Leader, Councillor Jordan
	When will the future of North Place and Portland Street car parks be resolved? How much car parking income has the Council lost since these sites were sold? How much New Homes Bonus and Council Tax has been lost due to the failure to build homes on these sites?
	Response from Cabinet Member
	<p>The car parking revenue for the site prior to sale was £350,000 net per annum. Whilst the Council is no longer in receipt of the income from the car park, it has benefited from a significant capital receipt of £7.8m in December 2014.</p> <p>The permitted scheme for North Place was for a 65,000 sq. ft. super market plus 605 car parking spaces, 300 of which as a public car park but no homes.</p> <p>The permitted development on Portland street was for a housing scheme of 143 homes. It is difficult to estimate the level of new homes bonus and council tax since the planned timing of delivery of the housing element and the council tax banding of the units was not determined.</p> <p>The council no longer has a controlling interest in the either site. However, we acknowledge the importance of this site to Cheltenham and officers have actively been engaging with the developers in working towards the regeneration of both sites. The council understands that complex negotiations between the developers and potential 'end users' are taking place and we are anticipating that the developers will be coming forward with an alternative deliverable proposal shortly. CBC has recently submitted a bid to the Housing Infrastructure Fund to assist with unlocking the housing development on Portland Street.</p> <p>In a supplementary question Councillor Nelson asked the Leader whether he regretted that the contract for the sale of North Place and Portland Street had not included a penalty clause which would have allowed the council to clawback the loss of car parking income from the failure to build the planned multistorey car park?</p> <p>The Leader advised that the site had been sold to Freemans and Auger Buchler and it was unfortunate that Morrisons had walked away from the deal and Skandia had also decided to move their business abroad. The council was working hard with the owners to bring forward a suitable development.</p>

9. PETITION TO RETAIN THE FLOWER DISPLAYS IN IMPERIAL GARDENS AND THE PROMENADE LONG GARDENS

Fiona Wild, petitioner, was invited to address Council. She highlighted that Cheltenham was renowned for its colourful town centre which was a major asset attracting visitors and their friends and family to return thereby boosting the local economy.

She referred to the growth in the Festivals and the compromise reached 6 years ago allowing them the use of Imperial Gardens while the floral planting, which this organisation wanted removed entirely, was retained, but in a slightly different position.

In terms of the buzzword "sustainable" she said this meant herbaceous planting would be out of season for at least 8 months of the year. The public were seduced by colour but with wild planting, there was often an even shorter flowering season and which would then turned into a brown, withered mess.

Mrs Wild highlighted that last month, Imperial Gardens won the Parks and Open Spaces Gold Award for horticulture, environmental responsibility & community participation. Lying in a formal setting, Imperial and the Long Gardens were best suited to formal planting. Whilst bedding plants required replacing twice a year, they provided colour for most of that time.

Mrs Wild said that Cheltenham needed to vie with comparable towns, for instance, Bath, Stratford and Tewkesbury, and not destroy one of its main attractions for short-term economic gain. Whilst bedding plants did not necessarily encourage wildlife, if all the other parks in Cheltenham were given over to wild and sustainable planting there would be plenty of places for birds, bees and other wildlife to thrive.

Mrs Wild felt that if the council's nursery was sold, several of the devoted parks & gardens staff would lose their jobs and she questioned whether that was a satisfactory way to thank them for their painstaking work over the years. The hanging baskets would be filled with plants bought from elsewhere, still at considerable cost. Whilst some gardeners may be retrained in a different style of gardening, a consultant would apparently need to be hired to advise on what to plant instead and also to redesign the gardens which would incur more expense. She felt that bedding plants for these central areas may as well be bought with that money.

The council was already spending a considerable sum on replacing the admittedly below-par Christmas lights. These may encourage visitors over the Christmas period but colourful flowers encouraged them to come throughout the year.

Finally, she once again urged the Council to maintain the formal floral planting in Imperial Gardens and the Long Gardens.

The Cabinet Member Clean and Green Environment thanked the organiser of the petition for her commitment and for taking the time to attend the debate today. He highlighted that he always acted in the best interests of the town and wished to assure the public that no decision had been made in relation to the issue. However, it was important that the council considered all its assets across the town longer term. He highlighted that this was not about cuts to services or saving money but the aim was to keep the extent of the planting, but

with consideration of other planting styles that would help to achieve the following aims :

- A move to a more modern style of planting using flowering perennials that gives year round interest
- Increase in levels of local biodiversity, benefiting pollinating insects
- Reduction of natural resources in the production and maintenance of the displays (water, topsoil and energy)
- Reduction in levels of maintenance i.e. does not require lifting and replanting twice per year, and continuous watering during the summer months.
- Greater tolerance to year round weather conditions and damage.

He also emphasised that hanging baskets and containers did not form part of the review which was focussed on considering assets and making a decision with regard to either investing heavily in the asset or disposing of it. He informed that a series of stakeholder events had been undertaken as well as visits to other local authorities which had moved towards more sustainable planting regimes. A Member seminar had also been well attended. Ultimately a Cabinet report would come forward for decision. He gave the assurance that the opinions expressed in the full debate and those from the other events would inform Cabinet. Finally he referred to an amendment to the recommendations as follows :

This Council notes the Cabinet's undertaking to hold a consultation should there be any proposal to change the existing seasonal planting regime in Imperial Gardens and the Promenade Long Gardens.

The following points were included in the debate :

- Members recognised that floral heritage in the town's parks and gardens was important to residents and visitors alike and the proposed changes to the planting regime had clearly raised significant concerns for a large number of the public, evidenced by the petition which had attracted an unprecedented 2.5k signatures in just 3 weeks. Members acknowledged that it was right that the council undertook an extensive review of its assets but there was clearly passion across the political spectrum and among the general public on this issue. It was vital therefore that the public became fully involved in this issue via an informed consultation.
- The Chair of Overview and Scrutiny suggested that a scrutiny task group could be formed to involve all Councillors and invite stakeholders including the petitioners which would give confidence to all that proper consideration of the matter had been given.
- Concern was expressed by a number of members that the recent Member seminar had been somewhat biased. Members had highlighted in that forum that the proposal should be subject to the widest possible consultation and on the basis of a full business case.
- A Member suggested that there should be more investment in the nursery and gave examples of other councils who had done so- Leeds,

Nottingham, Birmingham. It could act more commercially, engage in more contracts and be opened up to the general public. Bedding plants were no longer being sold to residents. The nursery had, in his view, great potential to be used as a visitor centre too, hosting educational tours and a training facility, particularly for those with learning difficulties whilst still concentrating on the core business of plants. This could bring wide social benefits. Another Member highlighted the missed opportunity in investing in the nursery in 2013 and it was asked whether it could consider contacting the Chamber of Commerce and other businesses to sponsor parks and gardens as was done with roundabouts but undertaking it as a council rather than via a marketing company.

- Many Members would give their support to a scheme of alternative sustainable planting outside of the core area i.e. to maintain the existing planting regime in Imperial and the Long Gardens, as they recognised that perennial planting could have its place in the town. They gave the example of planting around the Holst statue which was both creative and imaginative. Many felt however that perennial planting did however lack structure and would not be appropriate in the Long Gardens and Imperial Gardens. It was also highlighted that sustainable planting still required maintenance in terms of weeding and the gardens would still in any case require delimiting.
- A Member questioned what the cost of the contract would be to outsource 301 baskets to the town and the 40 black planters from Cheltenham in Bloom. A Member also asked what the number and value of the contracts to other local authorities was and why the council had stopped selling to the public? The Director Resources undertook to respond to this question after the meeting.

The Leader said the council was proud of its parks and gardens and proud of the way they were maintained and enhanced. He acknowledged that whatever changes were made these would be of high quality. He recognised the need for informed debate. He highlighted that climate change should also be considered when thinking about a future planting regime and noted that sustainable planting was a criteria for entering the Britain in Bloom competition.

The Head of Law was invited to address Council on the question raised by a Member as to whether Council could request Cabinet to defer this matter to Council. He informed that ultimately this was an executive matter and therefore the decision lay with Cabinet. However, it was the choice of Cabinet as to who it engaged with in reaching its final decision and as part of that engagement it could therefore decide to involve Council.

The following amendment was therefore proposed by Councillor Bickerton, seconded by Councillor Nelson :

A formal request be made to Cabinet to return this matter to Council for further debate and decision after a full public consultation and for additional information provided.

A Member acknowledged the strength of feeling in the petition debate and the huge public interest it had generated. However, he felt that the residents in the ward he represented were not concerned about flowers but rather about universal credit. This was therefore not his priority at the current time.

A Member urged other Members not to be afraid of more sustainable planting which could be colourful and produce better, creative gardens. The role of sustainable planting in terms of wildlife, particularly bees was also highlighted.

In response to a comment from a Member the Cabinet Member Finance confirmed that sponsorship was raised via marketing on roundabouts which amounted to £34k. In terms of sales from the nursery these had reduced as other local authorities were not purchasing the same quantity as they had done. When the last review of the nursery took place it had been identified that £2 million was required to be invested. It was therefore appropriate that the long term future of the asset be considered.

The Mayor thanked Members for a wide and varied debate.

The Cabinet Member Clean and Green Environment stated that he would be happy to incorporate the proposed resolution into the substantive.

Prior to Members voting on the substantive the Head of Law, reiterated that even though Council would have the opportunity to make a decision the final decision on the matter would be made by the Executive, i.e. Cabinet.

RESOLVED (unanimously) THAT

- 1. Officers consider the issues raised by the petition as part of developing options on the future approach to planting in Cheltenham's public realm.**
- 2. Cabinet's undertaking to hold a consultation should there be any proposal to change the existing seasonal planting regime in Imperial Gardens and the Promenade Long Gardens be noted.**
- 3. A formal request be made to Cabinet to return this matter to Council for further debate and decision after a full public consultation and for additional information provided.**

The Council adjourned at 4.35pm and resumed at 4.55 pm.

10. OVERVIEW AND SCRUTINY ANNUAL REPORT

Councillor Harman introduced the annual report as the chair of the Overview and Scrutiny committee. He thanked the Vice Chair Councillor Walklett and Councillor Payne who worked with him as a strong team coordinating the committee's work. O&S had received presentations from the Cheltenham Trust, the BID, the Festivals and Stagecoach and noted that one of their most successful visits was to hold their meeting at the St Georges and St Vincent's Centre and the committee had been important in terms of the Changing Places facilities supported by the Cabinet Member. He finished by encouraging all members to raise any matters with the scrutiny committee.

Although he had no criticism of the work of tO&S, a member did wish to raise a concern about the change of position of the current chair of O&S who since he had been appointed at Council, had taken a position as Cabinet Member at the county council. Scrutiny had since looked at a number of issues which involved

the county council and he suggested that the chair should have withdrawn from any discussions. He gave Stagecoach, devolution and broadband as examples where the county council would have been directly involved in decisions on these issues. Ubico was another area that had been scrutinised where the county council would be making a decision on what happens to waste and Councillor Harman was now the Executive member of the Health and Well Being Board. He commended the fact that the Council had in its Constitution that the O&S committee is chaired by an opposition member but he encouraged the opposition to consider who is most suitable for that position and he suggested that it was inappropriate for Councillor Harman whilst he was a Cabinet Member at GCC. However well he carried out his role he had a clear pecuniary declarable interest in some of the items detailed in the annual report.

The vice chair of O&S, Councillor Walklett, took on board the comments raised but he had not experienced any difficulties due to Councillor Harman's role on the county council. If anything did come up in the future he would bear in mind the comments made. Generally he felt the committee was performing a pretty strong scrutiny role.

In response Councillor Harman agreed to look into it but emphasised that he had been chosen by the opposition group to carry out the role for this municipal year and unless it was a serious issue he wish to carry on until then. He was not aware of any conflict but if he felt there was at any time he would take advice from officers.

Another member felt the challenge was reasonable but close working between this council and GCC was necessary and he suggested that the advantage of the chair of O&S being in a position of influence on the GCC Cabinet shouldn't be dismissed.

One member commented about the readability of the annual scrutiny report and suggested that the accounts of each working group needed to go into more detail, particularly on some of the challenges they had faced during the course of a scrutiny task group and the difficult questions they had raised. Another member suggested the requirement for detail could be covered by inserting an electronically link to the relevant scrutiny reports.

Another member suggested the annual work programme should be circulated with the annual report. Another member suggested that Council should also be informed of the work carried out by Cabinet member working groups. Whilst noting that they were not part of the scrutiny function they could provide some reassurance to the scrutiny process.

The Mayor raised concerns about the lack of women on any of the working groups and suggested that one of the reasons might be that unlike the old committees, meetings of task groups were not diarised in advance and were therefore none known commitment. Diversity of membership was important and perhaps the scrutiny structure should be reviewed to facilitate this.

In conclusion, Councillor Harman noted the points raised and payed particular thanks to Saira Malin and the rest of democratic services for their continued support to the scrutiny function.

11. NOTICES OF MOTION
Motion A

Councillor Savage left the room for this item.

The following motion was proposed by Councillor Clucas and seconded by Councillor Harvey:

“That this Council, mindful of the distress, concern and inconvenience to Cheltenham residents, that would ensue should Cheltenham A&E close, reiterates its opposition to any proposed closure or downgrading of A&E facilities at our local hospital. Council recognises the high esteem in which residents hold the Accident and Emergency Department and the staff who work there.

It further calls on the Chair of the Trust to confirm that any proposals in relation to the future of Cheltenham’s A&E will be discussed with the Council and shared with the people of Cheltenham to ensure that their voice is heard.

In addition, Council thanks the Accountable Officer at the CCG for her prompt response in ensuring that questions raised by councillors in relation to recent reports, were answered.

It further calls on the Member of Parliament to support the retention of a full range of A&E services at Cheltenham Hospital.”

In proposing the motion Councillor Clucas advised that from 19 October acute orthopaedic cases requiring surgery would be referred to Gloucester hospital. This was a further example of the ongoing loss of specialism from Cheltenham which made it difficult to attract medical staff to work in Cheltenham where there would be limited opportunities to develop their specialist skills. She provided some statistics from A&E which illustrated that both hospitals were struggling to provide the necessary facilities during the day and after 8 p.m. each evening when Cheltenham patients had to be diverted to Gloucester until 8 a.m. in the morning. Currently any gaps in the service were being filled by agency staff. These problems would only increase as Cheltenham had an older population than the average in England and countryside there was an increasing demand for A&E services as pressure on GP services increased. She did not consider the urgent care centre staffed by nurses and GPs was an adequate substitute. She urged the people of Cheltenham and Gloucestershire to understand what was going on and to make their voice heard to the CCG. A recent report from the Care Quality Commission had highlighted concerns about patient safety, bottlenecks in A&E, shortage of staff and medical care at night. She concluded that Cheltenham had a strong medical team and the people of Cheltenham needed to have access to those services in Cheltenham 24 hours a day. She urged members to support the motion.

Councillor Harman indicated that his group would support the motion but he would abstain as a Cabinet Member at the county council.

Councillor Nelson proposed an amendment that the two words “continue to” be added to the fourth paragraph before the word “support”.

This was accepted by the proposer and therefore this became the substantive motion.

In the debate that followed all members supported the motion and made the following points:

- this was a countywide issue and the A&E services must be effective for everyone not only in Gloucester and Cheltenham but also in the outlying districts
- more use should be made of technology to enable specialist skills and advice to be shared across locations. Glos. NHS Trust had not invested in the latest technology which would facilitate this and the sharing of patients electronic records
- it was important that staff were not degraded by feeling they were being used as a political football
- there appeared to be an ongoing downgrading of services and Cheltenham which was a cause of concern and possibly a topic for the health scrutiny committee to look at
- the proposals for an urgent care centre overnight at Cheltenham was still a downgrade from full A&E services
- what plans does the CCG have to ensure that it can provide adequate services to meet the increased demand from new housing developments?
- the elephant in the room was the crisis of staffing in the NHS and the difficulty in recruiting and retaining doctors, nurses and GPs. It was no good requesting more A&E services without calling for these staffing issues to be addressed.
- The Cheltenham General hospital building was a disgrace and not an attractive place to work
- A new hospital located at junction 10 to replace both Cheltenham and Gloucester would be the best solution to support the JCS plans for 2031 and this would also support the increasing number of accidents on the M5.

In seconding the motion Councillor Harvey suggested that the A&E department at Cheltenham supported not only the population of Cheltenham but also a catchment area east of Cheltenham with a total population in the order of 250,000. Any proposals for an urgent care service would represent a downgrading of services. He was concerned that there may be deliberate under resourcing at Cheltenham and although middle grade doctors had been recruited they were being sent to Gloucester rather than Cheltenham. There was a strong campaign in Cheltenham to maintain A&E services championed by the local MP but it appeared that decisions were being taken by unaccountable bureaucrats.

In her summing up Councillor Clucas thanked members for their support and they had echoed her feeling that the people of Cheltenham required a fully fledged A&E service with a consultant in charge and appropriate levels of staff and expertise.

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

MOTION B

The following motion was proposed by Councillor Savage and seconded by Councillor Harman :

This Council notes with concern the widely reported harassment, abuse and intimidation during the recent General Election campaign, including incidents of vandalism and arson here in Cheltenham.

It condemns all and any harassment, abuse or intimidation of election candidates, volunteers and those involved in the democratic process.

This council will work proactively to ensure that members of the public who wish to stand for public office are given the full support of this council and its partner organisations in exercising this fundamental right.

This council will ensure that all duly nominated electoral candidates are made aware of appropriate channels to ensure that any future incidents of harassment, abuse and intimidation can be reported and investigated.

In proposing the motion Councillor Savage said that as a newcomer to politics he was finding that national politics was becoming cruder, coarser and more aggressive and vitriolic with an increased tendency for abuse and insults rather than disagreement and political debate. The reasons were complex but the rise in social media had led to the ability to behave online with anonymity in a way which would be unacceptable in real life. He noted the reference in the briefing note by the Chief Executive circulated in advance of the meeting to the fact that the House of Commons Committee on Standards in Public Life were considering this issue and hoped that it would produce robust recommendations which would apply to politicians in Cheltenham. Cheltenham was not immune to the phenomenon of abuse and intimidation and during the general election the MP had received death threats and online incitements of violence and at a lower level there had been criminal damage to property. In standing for public office to serve communities and represent the people they serve, most candidates accepted considerable professional and personal sacrifice but they should not have to accept abuse and intimidation. Politics should be for discussion and debate and disapproval but with threats and intimidation it was now running the risk of discouraging people to stand thereby undermining the integrity of the democratic system. He urged the Council to take a clear stance against this abuse and intimidation at election time and send a clear and unambiguous message that this would not be tolerated.

Councillor Savage advised Members that he had accepted an amendment to the original motion which now read as follows :

This Council notes with concern the widely reported harassment, abuse and intimidation during the recent General Election campaign, including incidents of vandalism and arson here in Cheltenham.

It condemns all and any harassment, abuse or intimidation of election candidates, volunteers and those involved in the democratic process.

This council will ensure that all duly nominated electoral candidates are made aware of appropriate channels to ensure that any incidents of harassment, abuse and intimidation can be reported and investigated.

In the debate that followed Members raised the following points :

- They agreed that intimidation was outrageous and unacceptable and the way politics was conducted was of concern. Party machines did have an important function and at times they should think more about what they were doing. The easiest passion to provoke was hatred and persistent character assassination and slogans did create excitement. If the parties did not address this issue there was a danger to democracy and the language used would put people off from voting.
- It was recognised that the growth in social media allowed people to criticise anonymously and triggered abuse from a wide variety of people. It was important to ensure that democracy in Cheltenham thrived and that people were involved in debates and that the best candidates for public service were not lost.

Councillor Savage thanked Members for their input and for the Chief Executive for the briefing note provided. He acknowledged the limits in statutory powers to influence a complex issue but this motion should send a clear and unambiguous message.

Motion C

The following motion was proposed by Councillor Wilkinson and seconded by: Councillor Hobley:

This Council notes that:

Delivering the right mix of housing is a key part of Cheltenham's economic prosperity;

Ensuring young people are able to live and work in the town is vital for the future prosperity of the town, in line with the aspirations of the council's place strategy;

House prices to buy and to rent in Cheltenham are unaffordable for many younger people;

Short term tenancy agreements, at a standard of one year, reduce stability for the majority of young people who our town must retain for its future prosperity;

This discourages many younger people from moving here and remaining here in the longer term;

This promotes inbound commuting, leading to congestion and other associated problems such as poor air quality and economic inefficiency;

This is making it more difficult for businesses to recruit the right employees; and

The issue is identified by key stakeholders, including those at the recent Civic Society conference, as a key factor for the future prosperity of the town.

Council resolves to:

Explore all possible methods for delivering more affordable housing for younger people to buy, including influencing house sizes and types in new developments;

Take opportunities to work with developers to deliver shared ownership schemes;

Take opportunities to work with private sector companies that would provide longer term rental security;

Work with third sector partners on shared ownership schemes;

Explore and develop local planning policy and guidance reflecting these concerns for inclusion in the Cheltenham local plan; and

To recognise the issues of long term security in the private rental sector and affordability for first time buyers as key challenges to meet in the Cheltenham Local Plan.

In proposing the motion Councillor Wilkinson was concerned that previous generations had been able to buy their own property but this was not an option for young couples in Cheltenham today and generally life chances had diminished for young people. There was a consensus across all political parties that renting was not a good long-term solution but with current house prices in Cheltenham at eight times the local average salary, generally young people were renting for longer or were forced to move out of the town where house prices were cheaper.

Councillor Wilkinson suggested there were a number of ways in which the council would help. One way was to work with housing associations to provide housing which would not be subject to write to buy and can be rented out on a long-term basis. He had made a number of other suggestions in the motion. The consequence of not taking these actions was that young people would move to Gloucester and Cheltenham would lose momentum as a result and suffer a brain drain of young people. Businesses were already commenting that they were finding it difficult to recruit and retain staff in Cheltenham.

He observed that councillors round the chamber were not representative of the population in Cheltenham and indeed the consultation on the local plan had demonstrated a lack of responses from the under 25 age group. Therefore it was for this council to be the voice of young people and put in place what they knew young people wanted.

In the debate that followed several members felt that the central issue was the lack of social housing and that central government should require and enable local authorities to build more social housing which would then relieve pressures in the private sector. A member referred to the £2 billion of government funding for council and social housing that had been announced

and urged CBH to get a share of this. Another member felt it was disgraceful that a home sold under right to buy could not be replaced on a one-to-one basis.

Members also referred to the issue of affordable housing and the importance of having a good supply of affordable homes in the town. As a planning authority a member suggested that the council should be able to influence and force the issue of affordable housing with developers whilst recognizing that they still need to make a profit. Another member suggested that young people prefer to live in the centre of town and the council should be encouraging development of brown field sites for affordable accommodation for young people.

Other members referred to the number of empty properties often bought up by developers and then left empty. One cause could be low interest rates making property a better investment than savings. One member thought it was disgraceful that a number of three bedroomed houses were left empty on local army bases. Another member suggested a possible cause could be developers waiting for planning consent and one solution would be to lobby central government to look seriously at planning legislation and how the process could be speeded up.

Councillor Wilkinson raised a point of order that in his motion he had deliberately not mentioned social housing. His motion was specifically targeted at young people in the age group 25 to 35 on a reasonable income who would never qualify for social housing.

The Cabinet Member Housing said it was great from him to have had the opportunity to work with the council's ALMO. He referred to the decades of housing shortages and a generation which had now been priced out of the market. He felt the suggestions in the motion were a good start.

Several members referred to the types of employment available to young people. There was a strong service industry in Cheltenham which often experienced difficulties in recruitment as zero hours contracts were not attractive. Fixed term contracts were also becoming more frequent and these would not support mortgage applications.

In seconding the motion Councillor Hobley emphasised that social housing was not the solution to young people's needs. He himself had moved 10 times in the space of five years and he would never be eligible for social housing. Moving frequently between rented accommodation also incurred a high volume of letting fees and used up young people's savings for a future deposit on a house. In his ward, St Paul's, there were a significant number of buy to let properties, many rented out to students and local people could not afford to buy their first or second house in the area.

In his summing Councillor Wilkinson thanked members for all their support and encouraged the council to write to government and encourage them to take some action and for the council to incorporate some solutions to the problem as part of the development of the Local Plan.

Upon a vote the motion was carried unanimously.

- 12. ANY OTHER ITEM THE MAYOR DETERMINES AS URGENT AND WHICH REQUIRES A DECISION**
None.

Klara Sudbury
Chairman

Cheltenham Borough Council

Council – 11th December 2017

Gloucester, Cheltenham and Tewkesbury Joint Core Strategy

Adoption 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	This report seeks the resolution from Members to adopt the Joint Core Strategy, with the recommended main modifications, as part of the statutory Development Plan for Cheltenham Borough. In addition to this, a resolution is sought to delegate authority to the Chief Executive of Cheltenham Borough Council, to progress and sign two Memoranda of Understanding regarding sites within Tewkesbury Borough contributing towards Cheltenham’s housing supply.
Recommendations	<p>The Council is asked to:</p> <ol style="list-style-type: none"> (1) ADOPT the adoption version of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy at Appendix 2 to this report as part of the Borough Council’s statutory development plan (2) ADOPT the amendments (maps and text) to the adopted policies map as set out in the modified and new maps within Appendix 3 to this report (3) DELEGATE authority to the Director of Planning, in consultation with the Leader of the Council, in collaboration with Tewkesbury Borough and Gloucester City Councils to make minor spelling, grammatical, cross-referencing or typographical errors and presentational changes (including the addition of a Foreword) to the Joint Core Strategy and accompanying policies maps prior to publication (4) DELEGATE to the Chief Executive, in consultation with the Leader of Cheltenham Borough Council, to progress and sign a Memorandum of Agreement with Tewkesbury Borough Council in respect of the delivery of housing at Farm Lane, Leckhampton in Tewkesbury Borough to meet the housing needs of Cheltenham Borough;

(5) **DELEGATE** to the Chief Executive, in consultation with the Leader of Cheltenham Borough Council, to progress and sign a Memorandum of Agreement with Tewkesbury Borough Council in respect of the delivery of housing at land to the South of Tewkesbury Road, Uckington as within Tewkesbury Borough to meet the housing needs of Cheltenham Borough.

<p>Financial implications</p>	<p>As set out in this report, the soundness of the JCS is predicated on the requirement for an immediate review of housing supply for Gloucester City and Tewkesbury Borough, and an immediate review of retail policy for all three JCS authorities. There are clearly significant resource implications in undertaking these reviews. The current annual contribution of £60,000 will be reviewed to ensure sufficient resources are available to complete these pieces of work. Any additional funding requirement will be approved as part of the Council's budget setting process for 2018/19.</p> <p>If the JCS is not adopted, the preparation, examination and adoption of a replacement document (joint or otherwise) will also incur significant resource and cost implications.</p> <p>Contact officer: Sarah Didcote sarah.didcote@cheltenham.gov.uk, 01242 264125</p>
<p>Legal implications</p>	<p>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 the Inspector's Final Report. Save for any additional amendments, which (taken together) do not materially affect the policies set out in the development plan document with the main modifications, the wording must be as with the main modifications set out with the Final Report.</p> <p>At any time before the JCS is adopted the Secretary of State may exercise powers under Section 21 of the Planning and Compulsory Purchase Act 2004 to direct that the plan is modified in accordance with the direction or that the plan is (in whole or part) submitted to him for his approval.</p> <p>Under Section 113 of the Planning and Compulsory Purchase Act 2004 any application for leave to challenge an adopted plan (in whole or part) must be made before the end of the period of six weeks beginning with the day after adoption. The JCS will form and remain part of the Development Plan on adoption unless and to the extent any challenge under Section 113 of the Planning and Compulsory Purchase Act 2004 has been successful.</p> <p>As a joint plan the JCS will not be adopted until all three JCS authorities have resolved to adopt the JCS.</p> <p>Contact officer: Solicitor, cheryl.lester@tewkesbury.gov.uk, 01684 272 013</p>

<p>HR implications (including learning and organisational development)</p>	<p>No direct HR Implications arising from the report</p> <p>Contact officer: GO SS HR Manager, julie.mccarthy@cheltenham.gcsx.gov.uk, 01242 264 355</p>
<p>Key risks</p>	<p>A risk register has been completed and identifies the following key potential risk:</p> <ol style="list-style-type: none"> 1. Failure to adopt the JCS (all three JCS authorities need to resolve to adopt the JCS in order for its adoption to take effect) (see further within Appendix 1). <p>Further key potential risks are</p> <ol style="list-style-type: none"> 2. Legal challenge (see further at paragraphs 4.2 to 4.4). 3. Secretary of State call-in (see further at paragraphs 4.7 to 4.9). <p>These risks will be closely monitored by the responsible officer during the relevant time periods.</p>
<p>Corporate and community plan Implications</p>	<p>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.</p>
<p>Environmental and climate change implications</p>	<p>Non-adoption, 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.</p> <p>The JCS has been 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.</p> <p>To accompany this report, an Adoption Sustainability Appraisal is provided at Appendix 5</p>

<p>Property/Asset Implications</p>	<p>The JCS will update the Development Plan and make significant changes to designations such as Green Belt and relevant development management policies. The JCS area contains most if not all of the property owned by Cheltenham Borough Council. The Property team has been kept apprised of these changes, but will need to continue to ensure that future development proposals take account of the strategy laid out in the JCS and forthcoming Cheltenham Plan.</p> <p>Contact officer: Head of Property</p> <p>David.Roberts@cheltenham.gov.uk, 01242 264151</p>
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1.0 INTRODUCTION/BACKGROUND

- 1.1 The Joint Core Strategy (JCS) is a strategic planning document that has been prepared jointly between Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council. It provides the vision and planning framework to meet the development needs of the area between 2011 and 2031.
- 1.2 The three Councils agreed to work in partnership to prepare the JCS in 2008. During this time, the authorities have prepared a significant amount of evidence to establish the amount of new development required in the area, as well as the best and most sustainable way that it could be delivered, whilst recognising the specific characteristics and constraints within the area. This has included various public consultations where initial issues and options were considered, through to more detailed strategies.
- 1.3 The JCS was submitted to the Planning Inspectorate for independent examination in November 2014, the purpose of which was to assess the plan to ensure that it met the ‘test of soundness’ and was legally compliant. Hearing sessions then commenced in May 2015 where many different matters were discussed and examined in detail, including the number of new homes, the amount of employment land needed, the strategy for delivering development needs and the proposed strategic site allocations.
- 1.4 In May 2016 the authorities received the Inspector’s Interim Report, which concluded that further ‘Main Modifications’ were necessary in order to make the Plan sound. Proposed Main Modifications were then prepared and agreed by the JCS authorities in January / February 2017 and published for consultation between February and April 2017, which was then followed by further hearing sessions in July 2017.
- 1.5 Following on from this, the JCS authorities have now received the Inspector’s Final Report, a copy of which is provided at Appendix 4. The report concludes that the JCS as submitted has a number of deficiencies in relation to soundness and/or legal compliance which means the Inspector recommends non-adoption of it as submitted, but that with the recommended main modifications set out in the Appendix to the Final Report that the JCS can be made sound and/or legally compliant and capable of adoption. Further, that whilst there are issues with the

JCS which cannot be immediately resolved, it is in the public interest to have an adopted plan in place as soon as possible to reduce continuing ad-hoc, unplanned development; and that rather than delaying matters further, the balance is in favour of finding the JCS sound now subject to an immediate partial review (in respect of housing for Gloucester City and Tewkesbury Borough in order to address a shortfall in supply during the plan period, and an immediate review of retail policy for all three authorities). Such commitments can be found within recommended main modifications MM38 and MM123c. A revised Local Development Scheme (LDS) reflecting these commitments was adopted in October 2017 and a further revised LDS with detailed timetabling for the immediate reviews will be prepared for adoption in due course.

- 1.6 Given the conclusions and recommendations of the Inspector's Final Report, Council is now being asked to adopt the adoption version JCS at Appendix 2 of this report, which includes the recommended main modifications (and additional modifications which do not materially affect that policies of the JCS with the recommended main modifications) as part of the statutory Development Plan for Cheltenham Borough. Also to adopt the modified and new maps at Appendix 3 as part of the adopted policies map.
- 1.7 Once adopted by all three JCS authorities, the JCS will replace a number of 'saved' policies from the Council's adopted Cheltenham Borough Local Plan 2nd Review - 2006 (as set out at Appendix 1 of the adoption version of the JCS). However a number of the 'saved' policies within the Council's adopted Local Plan will still remain in place and will be reviewed and taken forward through the emerging Cheltenham Plan.

2.0 MEMORANDUM OF AGREEMENT: FARM LANE, LECKHAMPTON

- 2.1 A strategic allocation at Leckhampton was included in the Pre-Submission version JCS and was identified in the plan to deliver 1,124 dwellings and included land at Farm Lane within Tewkesbury Borough as well as land around Kidnappers Lane within Cheltenham Borough. This cross-boundary site was proposed to be allocated in order to help meet the housing needs of Cheltenham with the part of the site within Tewkesbury Borough being apportioned to Cheltenham's supply as part of the duty to cooperate.
- 2.2 Through the JCS Interim Report the Inspector came to the conclusion that the Farm Lane part of this site is unsound and that the numbers for the remainder of the site should be substantially reduced, bringing it below 450 homes which is the threshold for strategic allocations in the JCS. The Inspector therefore recommended that the allocation be removed from the JCS. However, the Inspector recognised that Tewkesbury Borough had granted planning permission for the Farm Lane part of the site and that developers were ready to proceed.
- 2.3 Through the work on the JCS for the proposed main modifications, the site at Farm Lane has been included in the housing trajectory for Cheltenham Borough as contributing towards their supply. This subsequently also forms part of the main modifications recommended by the Inspector, together with policy provisions that

the needs of Cheltenham will be provided within the administrative boundary of Cheltenham Borough, the cross-boundary urban extension at North West Cheltenham and West Cheltenham and commitments covered by any Memoranda of Agreement. As the site will not be included as a strategic allocation in the main modifications JCS there is a need for a Memorandum of Agreement between the two authorities to formalise this arrangement.

- 2.4 This report seeks a resolution to delegate to the Chief Executive at Cheltenham Borough Council, in consultation with the Leader of Cheltenham Borough Council, to progress and sign a Memorandum of Agreement with Tewkesbury Borough Council in respect of the delivery of housing at Farm Lane, Leckhampton in Tewkesbury Borough to meet the housing needs of Cheltenham Borough.

3.0 MEMORANDUM OF AGREEMENT: ARLE NURSERIES, UCKINGTON

- 3.1 The Inspector's Final Report recommends that an area of land is removed from the Green Belt around Tewkesbury Road, Old Gloucester Road and Arle Nurseries at Uckington. This land falls between Strategic Allocation A4 (North West Cheltenham) and Strategic Allocation A7 (West Cheltenham) and would provide a more appropriate Green Belt boundary between the two allocations that are also to be released from the Green Belt. This is a cross-boundary area of land located across both Cheltenham and Tewkesbury Boroughs.

- 3.2 In the Inspector's Interim Report it was noted that the smaller-scale area of Green Belt in this location has the potential to contribute towards Cheltenham's housing land supply. However, as this site is not allocated through the JCS there is a need for Memorandum of Agreement between the two authorities to formalise this arrangement.

- 3.3 This report seeks a resolution to delegate to the Chief Executive at Cheltenham Borough Council, in consultation with the Leader of Cheltenham Borough Council, to progress and sign a Memorandum of Agreement with Tewkesbury Borough Council in respect of the delivery of housing at land to the South of Tewkesbury Road, Uckington as within Tewkesbury Borough to meet the housing needs of Cheltenham Borough.

4.0 NEXT STEPS, CALL-IN, LEGAL CHALLENGE AND PLAN REVIEW

- 4.1 The adoption of the JCS is being considered by Gloucester City Council at its meeting on 23 November 2017, by Tewkesbury Borough Council on 5 December 2017 and Cheltenham Borough Council on 11 December 2017. Once adopted by all three Councils, the JCS will form a part of the statutory Development Plan for each of the three local authorities.

- 4.2 The Secretary of State has fairly extensive powers which may be exercised at any time prior to the resolution of all three JCS Councils to adopt the JCS having occurred. He may direct:

- i) That the document is modified – in which case no further steps may be taken until he is satisfied this has been complied with;
- ii) That the document is submitted to him for his approval – he may

approve, approve subject to modifications (which may be other than those recommended by the Inspector), or reject the plan;

iii) That the document is withdrawn.

- 4.3 Whilst considering whether to exercise any of these powers, he can issue a holding direction, in which case no further steps can be taken in connection with the adoption of the plan, until the holding direction either elapses (if a specified period is given in the direction) or it is withdrawn.
- 4.4 Unless and until any of the above directions are issued the Councils are able to continue taking steps in connection with the adoption of the JCS with the main modifications recommended by the Inspector.
- 4.5 The version of the JCS provided at Appendix 2 sets out the text of the plan and the policies and maps to which they relate. Following adoption by the three authorities, more publicly accessible printed and web versions of the JCS and Adopted Policies Map will be prepared, which may include minor presentational changes.
- 4.6 Whilst the JCS has been found 'sound' and legally compliant subject to the recommendation main modifications, this is on the basis that there will be an immediate review of housing supply for Gloucester City and Tewkesbury Borough, and an immediate review of retail is undertaken for all three JCS authorities. This will require continuing resources and funding to be allocated in respect of the JCS.
- 4.7 A person aggrieved by development plan document, such as the JCS, may, with the leave of the High Court, make an application to the High Court on the grounds that (a) it is not within the legislative powers; and/or (b) a procedural requirement has not been complied with.
- 4.8 An application for leave must be made before the end of the period of six weeks beginning with the day after the date the document has been adopted (or approved by the Secretary of State, as the case may be).
- 4.9 The High Court has wide powers in respect of quashing or the remitting (with very specific directions) of the document to either the local planning authorities or the Secretary of State that can be used in respect of the operation of the document either wholly, in part, generally or as it affect the property of the person applying to the High Court and may issue interim order whilst any application is being considered.
- 4.10 Alongside the JCS, the JCS authorities are each progressing Charging Schedules in respect of the Community Infrastructure Levy (CIL), a tariff style charge that may be charged on certain types of development to contribute to infrastructure to support growth in the area. The Draft Charging Schedules were submitted to the Planning Inspectorate for joint examination in November 2016. However it has been necessary to update the evidence and further consultation on changes to the Draft Charging Schedules made in response to changes relating to housing requirements and sites through the JCS has been undertaken. At the time of writing, it is understood that hearing sessions on the Draft Charging Schedules are likely to commence early in the New Year.

- 4.11 Members will be aware that in addition to the JCS, officers are also preparing the Cheltenham Plan. Once adopted, the JCS and Borough Plan will together form part of the Development Plan for Cheltenham Borough, along with any Neighbourhood Plans.

5.0 RELEVANT COUNCIL POLICIES/STRATEGIES

Cheltenham Borough Local Plan 2nd Review – 2006

Corporate Strategy

RELEVANT GOVERNMENT POLICIES

Planning and Compulsory Purchase Act 2004

Localism Act 2011

Town and Country Planning (Local Planning) (England) Regulations 2012

Housing and Planning Act 2016

National Planning Policy Framework

National Planning Practice Guidance

6.0 Alternative options considered

- 6.1 There is no reasonable alternative to deciding whether the adoption version of the JCS is acceptable to the Councils at this stage of the plan making process.
- 6.2 An agreement was reached between Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council in 2008. Since then, the preparation of the JCS has been an iterative process, considering issues such as the amount of new development that is needed in the area and the most appropriate strategy for delivering it, responding to the specific characteristics of the JCS area. This process has been informed by a thorough and ongoing Sustainability Appraisal, a process which seeks to ensure the most sustainable outcomes when preparing Development Plans.
- 6.3 As part of the Examination in Public, the JCS Inspector has considered alternative options and has concluded, that subject to the main modifications recommended, the approach to be taken in the JCS as 'sound' in her Final Report.
- 6.4 The options open to the Council are limited by the legislation. The Council can either (i) adopt the JCS, with the main modifications recommended by the Inspector (together with any additional modification which taken together would not materially affect the policies contained in the JCS if it were adopted with just the recommended main modifications); or (ii) not adopt. In the case of (ii) the Council would need to begin the preparation of a new plan (joint or otherwise), leading to continued speculative rather than plan led development until a new plan had been prepared and adopted. The Inspector has found the JCS, with main modifications, sound and (ii) is not recommended.

7.0 Consultation and feedback

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

- JCS Key Issues & Questions – Spring 2010
- Developing the Preferred Option – Spring 2012
- Draft JCS –Winter 2013
- Pre Submission Consultation - Summer 2014
- The Proposed Main Modifications were published for consultation between 27th February and 10th April 2017

7.2 The examination was 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.

8.0 Performance management –monitoring and review

8.1 The JCS will be subject to review and as set out in paragraph 1.5 of this report and in Part 7 of the JCS Adoption Version.

Report author	Contact officer: Development Manager – Strategy, philip.stephenson@cheltenham.gov.uk, 01242 264 379
Appendices	<ol style="list-style-type: none"> 1. Risk Assessment 2. Joint Core Strategy – Adoption version 3. Joint Core Strategy policy maps – Modified and New Maps 4: Inspector’s Final Report 5: Sustainability Appraisal Adoption Statement

Appendix 1 Risk Assessment

The risk				Original risk score (impact x likelihood)			Managing risk				
Risk ref.	Risk description	Risk Owner	Date raised	Impact 1-5	Likelihood 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
<p>Note : The JCS programme holds a detailed risk assessment which is managed through Operational Programme Board and Strategic Issues Board</p> <p>Explanatory notes</p> <p>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)</p> <p>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)</p> <p>Control - Either: Reduce / Accept / Transfer to 3rd party / Close</p>											

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

**Adoption Version
November 2017**

Foreword

To be completed

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PART 1 - Introduction

'The purpose of planning is to help achieve sustainable development...'

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

'Sustainable means ensuring that better lives for ourselves don't mean worse lives for future generations.'

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

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

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

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

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

The planning system is about helping to make this happen.'

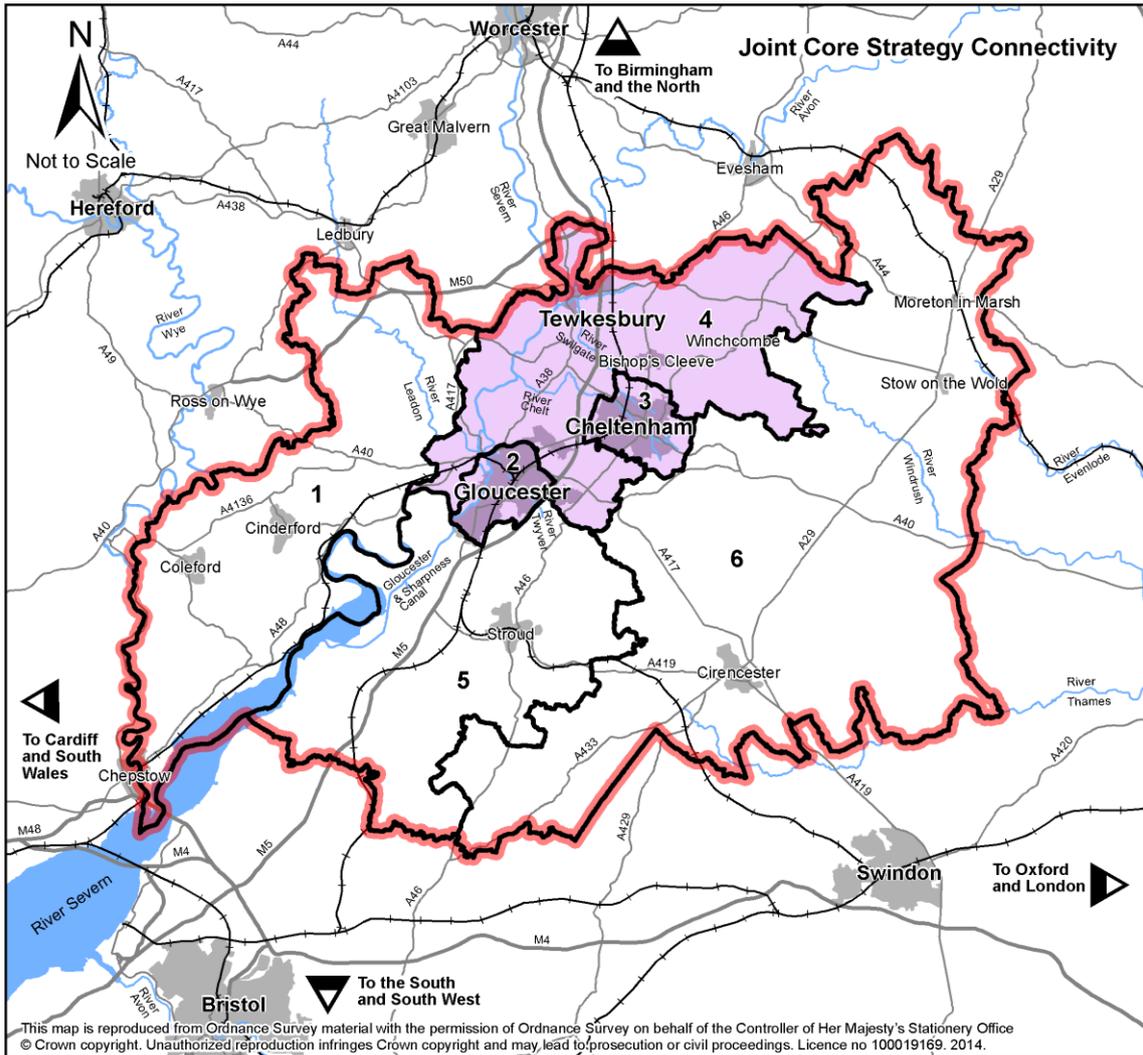
- 1.2 A key component in 'helping to make this happen' are development plan documents prepared by the local planning authority. In a plan-led system, planning applications are required to be determined in accordance with the development plan unless material planning considerations indicate otherwise.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

What is the Joint Core Strategy?

- 1.3 The JCS is an important part of the development plan for Gloucester City, Cheltenham Borough and Tewkesbury Borough and covers the area shown on the map on page 8. As a planning document, which looks to reflect the priorities of government, residents, businesses, local service providers and other stakeholders, the JCS has been prepared within

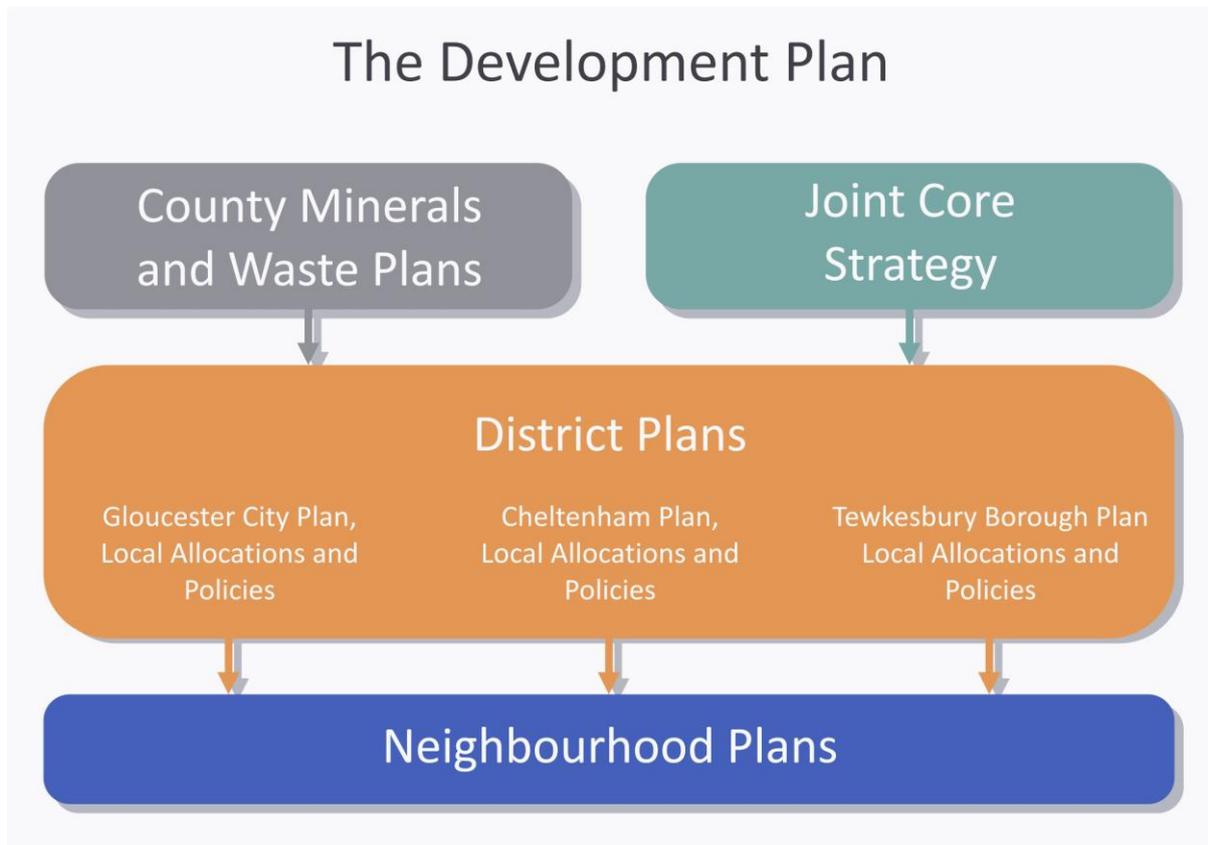
the context of national policy and having regard to the diverse aspirations and local characteristics that make up the area.

- 1.4 The JCS sets out the long-term vision and objectives for the area together with strategic policies for shaping new development and locations for new development up to 2031. Together, these policies help to provide a strategic planning framework for the JCS area, which guides future planning decisions and helps to achieve the overall vision for the area.
- 1.5 Whilst the JCS provides the higher level or strategic part of the development plan for the area, more detailed, locally-specific planning policies will be set out in the Gloucester City Plan, Cheltenham Plan and Tewkesbury Borough Plan, collectively called district plans. These will include local allocations of land for development and local policies to guide decisions on planning applications. They also form part of the development plan and will need to reflect and be consistent with the policies in the JCS as set out in the diagram on page 9.



Key

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



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

PART 2 - Vision and Objectives

- 2.1 Having considered the key challenges for the JCS area, established through earlier consultations, a vision has developed which sets out what type of place the JCS area will be by 2031 (the end date of the JCS). The starting point for the JCS vision was the three Sustainable Community Strategy visions already identified through community consultation.

The Gloucester City Vision 2012-2022

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

Cheltenham Sustainable Community Strategy Vision 2008-2028

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

Tewkesbury Sustainable Community Strategy Vision 2008-2028

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

Vision

By 2031 Gloucester City, Cheltenham Borough and Tewkesbury Borough will have continued to develop as highly attractive and accessible places in which to live, work and socialise.

The Joint Core Strategy area will be recognised nationally as enjoying a vibrant, competitive economy with increased job opportunities and a strong reputation for being an attractive place in which to invest.

The character and identity of individual communities will have been retained while improved access to housing will have addressed the needs of young families, single people and the elderly.

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

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

Area descriptions

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

- 2.6 The historic cathedral City of Gloucester is the county town for Gloucestershire. It is bordered by the flood plains of the River Severn and the Gloucester and Sharpness Canal to the west, the motorway and rising land to the east and south, linking into the Cotswolds Area of Outstanding Natural Beauty (AONB), and agricultural land to the north and east. Robinswood Hill and Churchdown Hill form two local landmarks. The City is a growing and transforming place and is delivering an ambitious regeneration programme with the overall aim of revitalising the City and its centre.
- 2.7 By 2031 Gloucester will have established its historic central core as a place for inward investment and opportunity. Key urban sites, including King's Square, Greater Blackfriars, Greater Greyfriars and the railway corridor, will have been successfully regenerated to provide new jobs and housing within central areas of the City to meet the needs of its naturally growing population and to encourage inward investment. The King's Quarter regeneration will have played a key role in increasing the vitality and viability of the City centre environment, shopping and leisure experience, combined with improved pedestrian, cycle and public transport improvements, including the new bus station. A vital and viable City centre will have raised Gloucester's profile as a strong, well-connected and resilient location where people will be proud to live and work in the economic and administrative capital of Gloucestershire.
- 2.8 However, there is limited capacity to accommodate all these competing development objectives within the urban area. Consequently, some peripheral development is needed to achieve these.

- 2.9 New high-quality business parks will be developed to retain and attract investment, thereby supporting the economic resilience of Gloucester City and the surrounding area.
- 2.10 The waterfront will be embraced, reinforcing links between the river and canal, regeneration areas and the City centre and raising the profile of its architectural history and Roman origins. In turn, this will improve investor confidence and tourist appeal. Its links with the A40 corridor and with Cheltenham will be used to support the potential of the City to attract investors and visitors alike.
- 2.11 Gloucester's natural environment will continue to be safeguarded and improved, particularly through the protection and enhancement of landscape features and key habitats within the City's boundary, such as Robinswood Hill and adjacent to it at Chosen Hill.

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

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

improved bus/taxi/private vehicle interchange; the latter funded through Gfirst LEP. The total value of the scheme will be around £5m which will be triggered after Network Rail have completed the extension to the northbound platform in 2017 to allow for the new inter-city express trains that come into service in 2018. This will build capacity, along with further improvements as the strategic allocations at West and North West are built out.

What does the vision mean for Tewkesbury Borough?

- 2.18 Tewkesbury is an attractive rural market town with a significant number of heritage assets and a high-quality historic environment. It forms part of a wider-related area incorporating Northway, Ashchurch and Wheatpieces. Tewkesbury town lies at the confluence of the Severn and Avon rivers, and these riversides offer great potential as a leisure destination and in attracting investment. Much of the remainder of Tewkesbury Borough is largely rural in character with over half of the population living in rural settlements (including market towns and villages) and hamlets/individual dwellings in the countryside. There are also significant areas of the borough which lie at the urban fringes of both Gloucester and Cheltenham.
- 2.19 The borough's landscape is diverse, ranging from the largely flat Severn Vale to the wooded slopes of the AONB bordering Cotswolds District to suburban development around the fringes of Cheltenham and Gloucester, as well as Tewkesbury town itself. Much of the western part of the borough is in an area at high risk of flooding.
- 2.20 By 2031, Tewkesbury town and its wider area will be a key location for significant housing and economic growth and will have strengthened its role as a desirable place to live and work, and will continue to be a popular visitor destination. The town will enjoy a strong reputation across the county and further afield, with unique attractions and thriving day- and night-time economies fulfilling a role that complements larger nearby centres and supports the rural borough.
- 2.21 The Tewkesbury Town Centre Masterplan will look to deliver the redevelopment of key sites across the town centre, and a clear move to embrace Tewkesbury town's unique riverside location will be the catalyst for such changes. It may also offer opportunities for improved flood mitigation schemes to reduce the impact of future flooding events on the town.
- 2.22 Additional high-quality business development will retain and attract investment, thereby supporting the economic resilience of Tewkesbury town and the surrounding area. All development in the area will recognise the importance and prevalence of flooding issues in the area, reducing the regularity and severity of such risks as far as is practicably possible.
- 2.23 The character of the rural area will be protected and enhanced. Opportunities for farm diversification for employment or rural tourism can further support the rural economy and will be encouraged. There are existing pockets of rural deprivation, partly the result of isolation from key services or employment opportunities. These issues will be addressed through the conversion of vacant and derelict premises, development of appropriate-scale businesses and better broadband provision. Additional housing will help to support existing and new services in rural areas and help to improve self-sufficiency of rural settlements.
- 2.24 Public transport will be improved, particularly the access between the larger rural settlements and the main urban areas. The role of Ashchurch for Tewkesbury railway station will be enhanced to provide good quality services and facilities to serve the area.

- 2.25 By 2031, the rural areas will be prosperous and playing their part in the economy of the JCS area. Rural communities will be vibrant and not simply dormitories for the urban areas, with good access to services and availability of affordable housing. In addition to any special provision through a Green Infrastructure Strategy, distinctive landscape character will have been protected, landscape features maintained and enhanced, and the countryside will be richer in wildlife with improved access for all. The tranquillity of the countryside will have been safeguarded, and noise and light pollution minimised. New development will be appropriate in scale, design and energy efficiency. The Green Belt will be managed to enhance its contribution to the landscape, biodiversity and access.
- 2.26 Areas of the borough which lie at the edges of Gloucester and Cheltenham will play an important role in accommodating development through urban extensions.

Key challenges

- 2.27 The overall trend for the JCS area is towards an ageing population. This reflects a national trend but is more pronounced in this area due to migration of pensioners from other parts of the country. This raises challenges in the provision of appropriate health and transport services, combined with a shrinking workforce as well as a reduction in average household size. Across the JCS area, evidence has shown that there is currently a net outflow of young people (aged 15-29 years), which is weakening the potential of the local workforce and making it a less attractive area for businesses. Against this trend, Gloucester City is expected to see a significant rise in the young and working-age population. To maintain a thriving economy and remain an attractive area for business, the number of dwellings and jobs needs to be more closely aligned.
- 2.28 The JCS addresses the needs of an increasing elderly population, coupled with natural growth in the existing population and shrinking household sizes (due to more single households, more lone parents and smaller families). This may mean that some young people move away or live with their parents into their 30s, while older people remain in unsuitable housing which does not meet their needs. Hence, the housing evidence has identified a need of around 1,525 new homes per year which needs to be accommodated in the JCS area over the next 20 years to provide adequate housing for its residents.
- 2.29 For young people the key issue in the area is not just the availability of housing, but also the price of housing. In the JCS area, the house price to earnings ratio is around 6:1 for people aged under 40 in 2011 (meaning the average house price is six times the average annual income of people under 40). There has been insufficient delivery of housing in recent years to lower this ratio. Whilst over 8,266 new homes have been delivered in the JCS area between 2006 and 2011, only 2,015 of these were affordable. That equates to about 400 new affordable homes per year. Housing need in both the rural and urban areas remains a pressing issue.
- 2.30 The largest employment sector is public administration, with other important sectors being tourism and finance. Diversifying the employment base to increase the number of knowledge-based jobs remains a key challenge for the area. Unemployment levels have been rising in the county since May 2008 with widespread impacts on almost all sections of the local economy. Since the 2007 recession, vacancy rates of shops have increased in both larger and smaller centres. Furthermore, there are now high numbers of young people aged 16-18 years who are not in education, training or employment. All of this indicates a need

for more employment and training opportunities so that the JCS area will remain a competitive location, providing companies with the opportunity to move or expand within the area and supporting young people entering the workforce.

- 2.31 While the JCS area is considered to be relatively affluent, this is not uniform across the area. There are pockets of deprivation including eight of the most deprived wards in England, which suffer from low incomes, unemployment, poor health and housing, low educational attainment, and crime and disorder. Tackling levels of deprivation through measures such as more frequent public transport and better community and health facilities remains a pressing issue.
- 2.32 Gloucester and Cheltenham are the main economic hubs for Gloucestershire and draw in a significant number of commuters. This places a considerable strain on the central areas in terms of traffic congestion and pollution. Increasing self-containment remains a key challenge for the area. Offering alternative modes of transport is easier to achieve in the major urban areas which are compact and thus offer potential for improvements to public transport, local cycling and pedestrian links. However, in the rural areas, maintaining and improving public transport is more challenging.
- 2.33 A further key challenge in meeting the objectively assessed need for development in the JCS area is the degree to which land within the JCS area is significantly constrained by flood plain, areas of Green Belt and the Cotswolds Area of Outstanding Natural Beauty (AONB). The JCS authorities have reviewed the capacities of their urban areas, i.e. those sites which already have planning permission or which are part of planned regeneration, and found they can support just over 60% of the identified need.
- 2.34 While early consultations examined the possibility of focussing development solely on urban areas this was predicted to lead to adverse consequences to the economic growth of the area, and would be likely to result in harm to the amenity of the City and town through increases in density and the loss of open spaces. Through consultation the possibility of a new town taking the remainder of the development need, creating sustainable urban extensions to the existing City and town areas, or dispersing new development throughout all settlements in the area have been considered as options and tested through the Sustainability Appraisal. All of these potential solutions would lead to the development of areas currently within the Green Belt or AONB. The solution of identifying and allocating strategic allocations closest to where the development need is generated has been found to be the most sustainable and strongly supported through consultation. However, this has meant that in order to release land for development the existing Green Belt has been reviewed and a new Green Belt boundary has been required, creating new and lasting defensible boundaries for the designation.
- 2.35 Climate change and its local manifestation of more frequent and more severe flooding is also a major issue in the JCS area as much of the area is low-lying and a significant proportion of existing residential properties are already at risk of flooding. Identifying new sites for development outside areas liable to flooding, and improving resilience to flooding of existing areas, is another key challenge of the plan.

Strategic objectives

- 2.36 To support and deliver the vision, the JCS sets out the following objectives. The aim is to achieve a sustainable balance that responds to the key challenges identified above and meets the overall needs of the JCS area.
- 2.37 A number of strategic objectives, closely aligned with the ambitions of the Sustainable Community Strategies, were put forward in previous consultation documents. Following the publication of the NPPF, the headings of the objectives were amended, and the objectives themselves have been refined following public consultation. Their impact on the environment, community and the economy has been tested through the Sustainability Appraisal process.
- 2.38 The objectives do not repeat national planning guidance which will be applied as a matter of course, but have identified spatial issues of local importance. Each policy specifies the objectives to which it is contributing.

Ambition 1 – A thriving economy

Strategic Objective 1 – Building a strong and competitive urban economy

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

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

Strategic Objective 2 – Ensuring vitality of town centres

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

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

Strategic Objective 3 – Supporting a prosperous rural economy

Facilitate rural employment generation and diversification by:

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

Ambition 2 – A sustainable natural, built and historic environment

Strategic Objective 4 – Conserving and enhancing the environment

Ensure that planning policy and decisions:

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

Strategic Objective 5 – Delivering excellent design in new developments

Ensure that all new developments are valued by residents by:

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

Strategic Objective 6 – Meeting the challenges of climate change

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

- *Making the best use of land by maximising the use of previously-developed land and encouraging higher-density developments in central locations, whilst promoting food security by protecting the highest-grade agricultural land and allotments*
- *Reducing the use of fossil fuels by increasing self-containment of settlements through mixed-use developments and providing new developments in sustainable locations*

- *In partnership with others, promoting the efficient use of natural resources, the re-use and recycling of resources, the production and consumption of renewable energy and the decentralisation of energy generation*
- *Encouraging and facilitating low- and zero-carbon energy development and the implementation of Sustainable Drainage Systems (SUDS)*
- *Ensuring that new development is located in areas which are not liable to flooding, that existing infrastructure is adequately protected from the threat of flooding, and that existing flood defences are protected and enhanced.*

Ambition 3 - A healthy, safe and inclusive community

Strategic Objective 7 – Promoting sustainable transport

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

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

Strategic Objective 8 – Delivering a wide choice of quality homes

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

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

Strategic Objective 9 – Promoting healthy communities

Promote development that contributes to a healthy population by:

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

PART 3 - The JCS Spatial Strategy

3.1.1 This part sets out key spatial policies for the JCS area. Policy SP1 sets out the overall strategy concerning the amount of development required, and Policy SP2 sets out the distribution of new development. These two policies, combined with Policy SD1 on the economy, provide the spatial strategy for the plan. This strategy, together with its aims, is expressed in relevant policies throughout the plan and will be supported by forthcoming district plans and neighbourhood plans. Each policy highlights which of the strategic objectives it addresses.

SP1 – THE NEED FOR NEW DEVELOPMENT

Background

- 3.1.2 The issue of how much development will be needed in the JCS area until 2031 has generated considerable debate. The NPPF defines this requirement as ‘objectively assessed need’ (OAN). This is an assessment of need for new housing based on evidence including the demands derived from the local economy.
- 3.1.3 One of the biggest challenges facing the JCS authorities is to accommodate the level of growth the area is likely to need in terms of housing, employment and infrastructure, whilst continuing to protect the natural and built environment that makes this area such an attractive place to live and work. This requires a balance to be struck between protecting these cherished assets, whilst ensuring that existing and future generations are able to form households, find work and make a valuable contribution to a strong community.
- 3.1.4 The NPPF sets out that planning should *‘proactively drive and support sustainable economic development to deliver the housing, businesses and industrial units that the country needs’* and that *‘every effort should be made objectively to identify and then meet the housing, business and other development needs of the area.’* It goes on to say that, when plan-making, councils should use their evidence base to ensure that their plans meet the *‘full, objectively assessed needs for market and affordable housing in the housing market area as far as is consistent with the policies set out in this framework’*.
- 3.1.5 The plan must be based on up-to-date evidence. The OAN for the JCS has been independently assessed by consultants Nathaniel Lichfield & Partners (NLP) and the Cambridge Centre for Housing and Planning Research (CCHPR). In considering this evidence, the JCS authorities have concluded that the OAN for the JCS area is 33,500 dwellings and a minimum of 192 hectares of B-class employment land to support approximately 39,500 new jobs. This level of development would reflect both demographic and economic projections and aspirations, and is considered to be a sensible assessment of both the future housing needs and the economic potential of the JCS area.
- 3.1.6 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.
- 3.1.7 The requirements set out in Policy SP1 reflect the evidence and take into account the following key issues:

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

Policy SP1: The Need for New Development

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

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

Explanation

3.1.8 The assessment of the OAN for housing follows the approach indicated by the NPPF and the PPG and takes as its starting point the latest official population forecasts and household projections. For the JCS this has meant using the Office for National Statistics (ONS) 2012 Sub-national Population Projections for England (May 2014) and the Department for Communities and Local Government (DCLG) 2012-based household projections (February 2015). However, the OAN assessment has also used the most recent evidence on how the population has changed. As such the assessment has been further adjusted to take into account the ONS 2014 Mid-Year Estimates (June 2015) and the latest ONS estimates for international migration statistics (August 2015). Using the latest available population and household formation data produced a demographically based estimate of the OAN for the JCS area of 31,830 homes over the plan period to 2031, as set out in Table SP1a below.

Table SP1a Demographic housing needs in the JCS area

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

3.1.9 Whilst this provides an important starting point in calculating the OAN for housing it is also important to consider the impact of economic growth forecasts and aspirations. This will ensure that sufficient housing is made available to support the delivery of employment and job growth.

- 3.1.10 In May 2016 the 2014 sub-national population projections were issued, as were the 2014-based household projections in July 2016. However, following review of this data (EXAM 263) it is considered that neither affects the housing need in the JCS. This is because the JCS housing needs have been employment led and the new demographic and household forecasts do not affect the number of homes needed to house the workforce required to support the projected job growth.
- 3.1.11 With regard to employment, it is important that the JCS reflects the spirit of the NPPF in helping to ensure that the *'planning system does everything it can to support sustainable economic growth'*. Local employment need has been independently assessed by consultants NLP to provide a robust analysis of employment potential in the area to ensure that the JCS plans for a sufficient level of jobs and employment land to support growth aspirations. To do this assessment the latest economic forecasts have been used, utilising data from three independent forecasters: Cambridge Econometrics, Experian and Oxford Economics. These outputs have also been considered against local intelligence on forecast growth of specific sectors which included targeted consultation with the GFirst Local Enterprise Partnership and local businesses. The assessment has also taken into account past trends and an analysis of supply and demand including loss of employment land to other uses. The evidence presented by NLP identifies that the JCS should establish a minimum requirement for B class employment land of 192 hectares to support positive business growth aspirations for a minimum additional 39,500 jobs.
- 3.1.12 In order to support aspirational economic growth the JCS has considered whether an economic uplift to the demographic OAN is required to support jobs. Having estimated the population needed in 2031 to provide the labour force implied by the three job forecasts, the number of homes needed to accommodate that population growth has been calculated using the household formation rates from DCLG's 2012-based household projections. The average of the three forecasts was taken which produced an economic 'policy-on' OAN of 33,500 dwellings.
- 3.1.13 Economic growth has been planned for at the JCS-wide level as a functioning economic area. The LEP strategy for economic growth, as set out in the Strategic Economic Plan, is focused on the M5 growth corridor running through the heart of the JCS area and not any particular authority. Therefore economic growth needs to be seen in the JCS area-wide context. This is a different approach from housing where each district has its own specifically assessed needs and requirements. Therefore, it is difficult to attribute the housing needs resulting from any additional policy-on economic uplift to specific areas. Nevertheless, the JCS has sought to distribute this uplift in dwellings in accordance with the amount of employment land potential in each authority area and with the spatial strategy set out at Policy SP2. This has resulted in the policy-on OAN for each area set out at Table SP1b.

Table SP1b OAN with economic uplift

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

- 3.1.14 The employment forecasts for the JCS area are subject to considerable uncertainty and this is demonstrated in the way that they can change over a relatively short period of time. However, the JCS authorities believe that by establishing an OAN of 33,500 dwellings, this will ensure that economic growth in the area is not constrained by the supply of housing.

3.1.15 Further to the economic uplift an additional 5% increase has been applied to the economic led OAN. This 5% has been added in order to boost the delivery of affordable housing as well as providing additional flexibility to the supply of land and boosting housing delivery in general. This further uplift has resulted in an overall housing requirement for the JCS area of 35,175 dwellings over the plan period. The resulting requirement for each area is set out at Table SP1c.

Table SP1c 'Policy-On' OAN with 5% Uplift

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

Delivery

3.1.16 The JCS plans for a significant level of housing and employment development to meet the needs of the area over the plan period. The level of housing development proposed is at an overall rate higher than that observed in the JCS area overall since 1991 and would represent an increase in housing supply in line with the aims of NPPF and the best available information of the likely levels of housing required by 2031.

Annual JCS Housing Delivery		Annual JCS Housing Requirement
1991-2001	2001-2011	2011-2031
1326	1450	1759

3.1.17 Policy SP2 provides the spatial strategy for how development will be distributed and delivered across the JCS area. A key part of the delivery will be through the development of the Strategic Allocation sites that are identified through Policy SA1. These large sites will make a key contribution towards the housing and employment needs of the area. However, whilst the JCS provides the strategic-level part of the development plan, there is a significant role for delivery at the non-strategic level through both the district and neighbourhood plans.

3.1.18 Each authority will also be covered by a district-level plan, namely the Gloucester City Plan, Cheltenham Borough Plan and Tewkesbury Borough Plan. These plans will provide more detailed and locally specific planning policies as well as local site allocations. The district plans will deliver the individual district capacities identified through the JCS in accordance with the spatial strategy. Neighbourhood plans must be in conformity with strategic policies of the development plan and can have an important role in identifying sites and policies to guide development at the local level. Where neighbourhood plans are 'made', they form part of the development plan and its policies will be used in decision making to determine planning applications. The JCS authorities recognise the contribution that neighbourhood plans can make in helping the delivery of growth and will work with town and parish councils and community groups to support them in producing plans.

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

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

SP2 – DISTRIBUTION OF NEW DEVELOPMENT

Background

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

Policy SP2: Distribution of New Development

- 1. To support their economic roles as the principal providers of jobs, services and housing, and in the interests of promoting sustainable transport, development will be focused at Gloucester and Cheltenham, including urban extensions to these areas.**
- 2. To meet the needs of Gloucester City the JCS will make provision for at least 14,359 new homes. At least 13,287 dwellings will be provided within the Gloucester City administrative boundary, including the 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.**
- 3. To meet the needs of Cheltenham Borough the JCS will make provision for at least 10,996 new homes. This will be provided within the Cheltenham Borough administrative boundary and cross-boundary urban extensions at North West Cheltenham and West Cheltenham (both of which are partly within Tewkesbury Borough) defined in Policy SA1, and commitments covered by any Memoranda of Agreement.**
- 4. To meet the needs of Tewkesbury Borough, none of which is being met by the urban extensions to Gloucester and Cheltenham, the JCS will make provisions for at least 9,899 new homes. At least 7,445 dwellings will be provided through existing commitments, development at Tewkesbury Town in line with its role as a market town, smaller-scale development meeting local needs at Rural Service Centres and Service Villages, and sites covered by any Memoranda of Agreement.**
- 5. Rural service centres and service villages as identified in Table SP2c below will accommodate lower levels of development to be allocated through the Tewkesbury Borough Plan and Neighbourhood Plans, proportional to their size and function, and also reflecting their proximity and accessibility to Cheltenham and Gloucester and taking into account the environmental, economic and social impacts including existing levels of growth over the plan period. Over the plan period to 2031:**
 - The rural service centres will accommodate in the order of 1860 new homes, and**
 - The service villages will accommodate in the order of 880 new homes**
- 6. In the remainder of the rural area, Policy SD10 will apply to proposals for residential development.**
- 7. The unmet needs of Gloucester and Cheltenham, beyond their administrative boundaries, will only be delivered on Strategic Allocation sites allocated through Policy SA1 and any other sites with an agreed sharing mechanism through a Memorandum of Agreement between the relevant local planning authorities.**
- 8. The identification of any additional urban extensions to help meet the unmet needs of a local planning authority must be undertaken through a review of the plan. Any additional site allocations made through a local plan or any neighbourhood plans must be in conformity with the JCS spatial strategy. Consideration will also be given to meeting needs in another local authority area where it is clearly established that they cannot be met within the JCS area, or provide a more sustainable and appropriate option.**
- 9. To support economic growth in the JCS area, the JCS will make provision for at least 192 hectares of B-class employment land. At least 84 hectares of B class employment land will be delivered on strategic Allocation sites as detailed at Policy SA1. Any further capacity will be identified in District Plans.**

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

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

Explanation

- 3.2.5 The guiding principle of Policy SP2 is that need is met where it arises, so that Gloucester and Cheltenham, together with their immediate wider areas, remain the primary focus for growth. This reflects the urban-focused economic vision and support for urban regeneration for the JCS area.
- 3.2.6 In order to assess how much land is available to meet the JCS area's needs, the authorities have reviewed all potential sources of housing land supply. The potential land supply between 2011 and 2031 comes from a number of sources. Firstly, houses that have been built between 2011 and 2016 count towards meeting needs in the early part of the plan; secondly, sites which have already been granted planning permission, including those that are being built out; thirdly, allocated sites in existing adopted development plans. In addition, we have been informed by the Strategic Assessment of Land Availability (SALA) process, although this does not consider all constraints which could prevent sites coming forward.
- 3.2.7 An assumption has been made as to how many windfall sites (sites which are not allocated in development plans but come forward through planning applications) will be granted permission across the plan period in each district, reflecting the most recent guidance included in national PPG.
- 3.2.8 There are also further sites to be identified through the district plans. Work on the Gloucester City Plan, Cheltenham Borough Plan and Tewkesbury Borough Plan are advancing alongside the JCS and will bring forward allocations to deliver each area's identified district capacity. In total, these sources of land supply are thought to be able to provide for approximately 58% of the housing to be delivered in the JCS (19,700 homes), predominantly within the urban areas. The urban capacity figures that are being set out in this document are an estimate based on the best information available at this time. Therefore it is essential that enough land is allocated on sites of strategic scale to provide flexibility ensuring that the overall requirements for the JCS area as a whole are met and the plan is sound.
- 3.2.9 Recognising that there is insufficient land inside the existing urban boundaries of Gloucester and Cheltenham, together with commitments within Tewkesbury town, to accommodate their housing and employment needs, there was a need to find additional land to meet the JCS needs. Hence, urban extensions to Gloucester and Cheltenham have been identified, which would accommodate approximately 35% of the housing supply identified in the JCS.
- 3.2.10 As concluded by the Sustainability Appraisal, urban extensions are considered to be the most sustainable locations for new development (following existing urban areas) as they can share transport, social and service infrastructure with existing urban areas and are located close to essential services. Further information on the approach to the distribution of development is set out in the 'Spatial Options' topic paper (October 2013), available along with the other evidence base documents on the JCS website.
- 3.2.11 The locations for the urban extensions and Strategic Allocations have been derived through a selection process involving a comprehensive assessment of land surrounding the three main centres of Gloucester, Cheltenham and Tewkesbury. Critically, this process has been

informed by detailed evidence base on site-specific issues including flooding, biodiversity, Green Belt, landscape and visual sensitivity, transport and infrastructure as well as being subject to assessment through the Sustainability Appraisal. The development of the site selection process is detailed through the Broad Locations Report (October 2011) and the Strategic Allocations Report (2013).

- 3.2.12 It is anticipated that development on the urban extensions and strategic allocations will be started within the early part of the plan period in order to ensure an 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.
- 3.2.13 Beyond Gloucester, Cheltenham and the Strategic Allocations, further development will be accommodated within Tewkesbury Borough. Tewkesbury Town, in accordance with its role as a market town, will deliver development. For the wider rural area, the starting point for the distribution of development was drawn from the evidence set out within the Rural Area Settlement Audit, updated in 2015, available to view on the JCS website. There are two settlements, Bishop's Cleeve and Winchcombe, which offer a higher range of services and facilities within the rural areas; these are defined as rural service centres.
- 3.2.14 In addition, there are a number of freestanding villages within Tewkesbury Borough which are considered to be suitable locations for some limited residential development. These villages were assessed as having two or more primary services, two or more secondary services and benefiting from bus services and/or road access to a major employment area by the 2015 Rural Area Settlement Audit Refresh and updated by further evidence as available. These settlements are defined as service villages. The retention of services is intrinsically linked to the size and distribution of the resident population and it is important that these services remain viable. About 2,740 homes will be accommodated across the rural area over the plan period to 2031; this development will be concentrated on the rural service centres and service villages. More development will be accommodated at the rural service centres than at the service villages. Approximately two-thirds of the development has already been delivered or committed, but the remainder will be allocated through the Tewkesbury Borough Plan and neighbourhood plans.
- 3.2.15 The total number of dwellings that is being provided for within the JCS area is approximately 31,824, which includes a contribution from Wychavon. This is lower than the overall housing requirement (including economic and 5% uplift) of 35,175. This shortfall occurs in meeting the needs of both Gloucester City and Tewkesbury Borough.
- 3.2.16 In meeting the needs of Gloucester it has been necessary to allocate sites on the edge of the urban area in Tewkesbury Borough. However, due to significant constraints and availability of land it has not been possible to allocate sites in the JCS to meet all of Gloucester's need over the plan period. Nevertheless, Gloucester has a good supply of housing land for the short to medium term that will enable it to meet its requirements to at least 2028/29. This will allow adequate time for an early review of the plan to explore further the potential for additional sites to meet Gloucester's needs in the longer term towards the end of the plan period. This would also allow the consideration of additional development options that may become available, both within and outside the JCS area. This could include the unlocking of further development opportunities within the urban area, as well as potential new urban

extensions in Tewkesbury Borough and Stroud District or elsewhere in the housing market area. The JCS authorities have a Memorandum of Understanding in place with Stroud District in this regard.

- 3.2.17 At Tewkesbury town there are similar issues with allocating strategic sites that are within the JCS area when taking into account the significant constraints and availability of land around the urban area. This issue has been exacerbated by the decision by the Defence Infrastructure Organisation regarding the delayed release of the MoD Ashchurch site. As a result Tewkesbury Borough has an identified shortfall against the total JCS requirement of approximately 2,450 dwellings. Nevertheless, there are opportunities for development at the MoD Ashchurch site within the plan period if infrastructure constraints can be overcome to release available parts of the site. Similarly there is potential for development at a site at Fiddington once the highway infrastructure needs around the A46 and M5 Junction 9 are established. While these sites cannot be allocated now due to uncertainties over their deliverability and capacity, a commitment has been set out in the Delivery, Monitoring & Review section to undertaking an immediate review of Tewkesbury's housing supply so that further work on the development potential around the Tewkesbury town and Ashchurch area can be carried out. Further information is also provided in the JCS Housing Implementation Strategy. In addition, there is joint working with Wychavon District Council to look to bring forward the cross-boundary site at Mitton, adjacent to the town. The adopted South Worcestershire Development Plan (2006-2030) already includes a policy commitment to consider, including through a review of the plan, meeting the needs of other authorities within the SWDP area. The site at Mitton is specifically referenced in this context. In addition, there is joint working with Wychavon District Council to assess the potential and possible release of land at Mitton.
- 3.2.18 As noted above there is currently a significant shortfall identified for Tewkesbury. However, Tewkesbury has an oversupply against its annual requirement from 2011/12 to 2016/17 and has a good supply of housing land that will enable it to meet its requirements over the short to medium term. An immediate review of the JCS would allow for the remaining shortfall to be addressed by exploring additional sites both within and outside the JCS area, including the potential for additional working with Wychavon District Council. Further information is provided within the Delivery, Monitoring & Review section of this plan.
- 3.2.19 The three authorities have prepared a detailed housing trajectory setting out when development is likely to take place. This work also includes an assessment of the five-year housing land supply position; details of this assessment are set out in the Housing Implementation Strategy available on the JCS website.
- 3.2.20 In regard to employment land the JCS sets the framework for the delivery of a minimum of 192 hectares of B-class employment need. The sources of supply includes a mix of high quality and well-located large strategic sites, existing undeveloped available employment sites, and potential additional smaller sites in the urban and rural areas. The Strategic Allocations are expected to deliver at least 84 ha of B-class employment land. Through the district plans each authority will explore the potential to allocate further local employment sites. This will provide choice and flexibility to support delivery of B-class employment growth. Monitoring of the plan would establish the growth of employment throughout the plan period, including any windfall development, and seek to rectify any shortfall through plan review. This will include through further exploration of growth opportunities at the MoD Ashchurch site and the wider M5 Junction 9 area.

3.2.21 The JCS Economic Update Note (February 2016) assessed the potential employment land supply for each of the districts. This used information provided through the Strategic Assessment of Land Availability to present a broad indicator of potential capacity based on the availability, suitability and deliverability of the sites. It also explored existing undeveloped commitments and existing allocations. This Update Note provided an indicative availability of B-class land of approximately 7ha at Gloucester City, 1ha in Cheltenham Borough and 40ha in Tewkesbury Borough, as well as 63ha of existing undeveloped employment land (based on previous allocations and extant permissions). With the JCS Strategic Allocations, a total of 195ha of B-class employment land is identified. Further investigation into employment allocations and capacity will be undertaken through the district plans.

Apportionment of Urban Extensions

3.2.22 All three authorities have worked together to find sustainable sites to meet the development needs of the area, transcending their administrative boundaries. As such, the three urban extensions proposed (excluding 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.

3.2.23 Under the Duty to Cooperate it is recognised that, regardless of the fact that the majority of the land is within Tewkesbury Borough, the urban extensions are identified to meet the unmet needs of Gloucester or Cheltenham. Therefore dwellings being delivered on urban extensions to Gloucester or Cheltenham will contribute solely to the needs of the area's respective OANs and land supply calculations.

Delivery

3.2.24 To assess the performance of the JCS, a separate monitoring framework is included in the plan, setting out the key indicators and contingencies that will be critical to the successful delivery of the plan strategy. This is set out within the Delivery, Monitoring and Review section.

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

Table SP2a: Sources of housing supply in the JCS area

	Housing Supply
Gloucester City	
Completions	2,962
Commitments*	2,460
Windfall Allowance	832
Gloucester City Plan (Further Potential)	1,518
Strategic Allocations (Gloucester City)	620
Urban Extensions (Tewkesbury Borough)	4,895
Supply Total	13,287
Cheltenham Borough	
Completions	1,724
Commitments*	2,178
Existing Local Plan Allocations	10
Windfall Allowance	784
Cheltenham Borough Plan (Further Potential)	1,011
Urban Extensions (Cheltenham Borough)	2,775
Urban Extensions (Tewkesbury Borough)	2610
Supply Total	11,092
Tewkesbury Borough	
Completions	3,224
Deliverable Commitments*	2,854
Existing Local Plan Allocations	0
Windfall Allowance	552
Tewkesbury Borough Plan (Further Potential)	315
Mitton (Wychavon District)**	500
Supply Total	7,445
<i>*Includes Local Plan commitments</i>	
<i>**site is within Wychavon District and is not an allocation in the JCS. Site is subject to joint working between Wychavon District Council and Tewkesbury Borough Council.</i>	

Table SP2b Apportionment of Strategic Allocation sites and District Capacity

SUB AREA	AREA	Authority Area	Housing Supply
Gloucester City Supply	Gloucester City Urban Capacity	GCC	7,772
	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
Cheltenham Borough Supply	Cheltenham District Capacity	CBC	5,707
	North West Cheltenham Urban	CBC/TBC	4,285

	Extension		
	West of Cheltenham Urban Extension	CBC/TBC	1,100
	Tewkesbury Borough District Capacity	TBC	6,945
Tewkesbury Borough Area Supply	Mitton* * site is within Wychavon District and is not an allocation in the JCS. Site is subject to joint working between Wychavon District Council and Tewkesbury Borough Council.	WDC	500
Total JCS Area			31,824

Table SP2c: Settlement hierarchy

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

* The service village classification was informed by the 2015 Settlement Audit Refresh. The JCS Settlement Audit will be reviewed to support the preparation of the Tewkesbury Borough Plan. The outcomes of the review will be used to ensure that the 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.

PART 4 – Sustainable Development Policies

SD1 – EMPLOYMENT – EXCEPT RETAIL DEVELOPMENT

Background

- 4.2.1 A core planning principle of the NPPF and one of the starting points for the spatial strategy of the JCS is the delivery of sustainable economic development. To reflect this planning principle and to also support the implementation of the Strategic Economic Plan for Gloucestershire (SEP), the JCS has established a vision to provide the context for economic growth;

“The Joint Core Strategy Area will be recognised nationally as enjoying a vibrant competitive economy with increased job opportunities and a strong reputation for being an attractive place to live and invest”.

- 4.2.2 This vision is underpinned by three specific strategic objectives to support a thriving economy through building a strong and competitive urban economy, ensuring the vitality of town centres and supporting a prosperous rural economy.
- 4.2.3 In the NPPF, employment is considered in a wider sense than the traditional industrial, office and warehousing (B1, B2 and B8 uses). For example, uses such as retail, hotels, tourism, leisure facilities, education, health services and residential care, (referred to as non-B use classes) can also be large employment providers. This policy covers job-generating uses such as business, industry and tourism. Retail and other uses, including those within use class ‘A’ are not covered by this Policy and are dealt with in Policy SD2. More detailed policies will be included in district plans.
- 4.2.4 In order to prevent the incremental loss of existing employment land to non-employment uses, and to ensure an adequate supply and choice of employment land and premises for the employment market, district level plans will contain policies to safeguard existing employment sites. These policies in district plans will only permit changes of use in certain appropriate circumstances to be defined by those plans. This policy is intended to be read alongside these district plan policies when considering development proposals for any area.

Policy SD1: Employment – except retail development

Employment-related development will be supported:

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

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

Explanation

- 4.2.5 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.
- 4.2.6 The vision and objectives of the plan for an urban focused economic strategy, aligning with the notion of a principal urban area within the County; this is based around the promotion and regeneration of the key urban centres of Gloucester and Cheltenham, the market town of Tewkesbury and the wider rural areas of Tewkesbury Borough, supported by strategic allocations in sustainable locations. This strategy fits within the M5 growth corridor established by the SEP and balances economic potential with housing provision for the JCS area as a whole.
- 4.2.7 Policies SP1, SP2 and SD1 provide the policy context for the delivery of the spatial elements of the economic strategy for the JCS area, with the aim of locating jobs near to the economically active population. Details of JCS strategic employment allocations are set out in policy SP2 and the SA policies. In summary, the JCS strategic allocations include strategic

employment land around Junction 9 of the M5, (strategic allocation A5), near Junction 10 employment land is included in the North West Cheltenham strategic allocation (strategic allocation A4) and at West Cheltenham (strategic allocation A7). In addition, land to the east of junction 10 and to the west of the West Cheltenham strategic allocation is removed from the Green Belt and safeguarded to meet longer-term development needs. In addition to these growth areas within the M5 corridor, the JCS provides for employment land within strategic allocations A1 and A2.

- 4.2.8 This provision is in addition to the existing capacity of available employment land and any remaining land from previous development plan allocations within each authority area, extant planning permissions, as well as any employment land allocations that may be made through the City and Borough district plans.
- 4.2.9 Alongside provision proposed by strategic employment land release, all three of the JCS Councils are actively pursuing and promoting economic growth through a range of strategies and initiatives, which are informing the economic strategies being taken forward through district plans.

Key growth sectors and other important local economic drivers

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

M5 growth corridor

- 4.2.11 The SEP has highlighted the economic growth potential of the M5 corridor, and all of the JCS strategic employment allocations fall within that corridor. The SEP places particular focus around the motorway junctions.
- 4.2.12 There is agreement across relevant partners that the upgrading of Junction 10 to an all movements junction will support the economy of the JCS area and that of wider Gloucestershire. It would support accelerated growth of the economy, enabling land to be delivered for mixed use including high value employment. A Junction 10 task group has been set up to establish the timetable for evidencing the business case for the upgrading of this junction of the M5. Given funding timelines, the earliest funding could be available is 2021 with support through the Highways England Road Investment Strategy. All partners on the 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.
- 4.2.13 There is currently a high level of demand for employment land around Junction 9 and a joint task group has been set up to consider both the development potential and the infrastructure issues that would need to be addressed; this group involves the JCS authorities, Gloucestershire County Council, the LEP, Highways England and the Homes and Communities Agency. There may be further economic development potential at some of the

other junctions.

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

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

Key growth sectors

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

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

4.2.17 The SEP includes a range of programmes and interventions to support these key sectors and the growth aspirations of these sectors have played a key role in the JCS approach to economic growth and establish the level of employment land that is likely to be required to meet those aspirations.

4.2.18 To assess how the need for employment land can be met, each council has assessed how much land is likely to be available, both in terms of larger strategic sites but also sites to allow growth of existing businesses, especially in the key growth sectors, on smaller sites to support the growth of small and medium sized enterprises, or where development would support urban regeneration or the rural economy. Because of the constrained supply of employment land in the urban areas, the JCS authorities will wish to evaluate the implications of changes of use. As such, policies on the safeguarding of employment sites will be set out in district plans.

4.2.19 Providing start-up space that can be easily accessed by those establishing new businesses is also vital to stimulate innovation and entrepreneurship within the JCS area; developments are especially encouraged which provide a range of types and sizes of units including start-up and flexible workspaces. More information and guidance in this respect will come

forward in district plans. Where specialised skills are available, clusters of enterprises can add value to the economy. This spatial strategy can support skills development by encouraging the provision and expansion of suitable education and training facilities with access in person and by electronic means.

- 4.2.20 The JCS authorities seek to support economic growth in the JCS rural areas and to take a positive approach in encouraging the growth and development of new and existing enterprises.
- 4.2.21 Employment-generating farm diversification projects, and the re-use of rural buildings or the creation of well-designed new buildings which are of an appropriate scale and use, will be supported wherever they accord with the other policies in the development plan.
- 4.2.22 The availability of advanced ICT infrastructure including high-speed broadband access is important for the success of the local economy and skills development. Good transport connections and adequate provision of other infrastructure are also essential to support people in employment.
- 4.2.23 A number of other enterprises and institutions play a key role in the local economy and are supported by the policies of the JCS, in particular policies SP1, SP2 and SD1.

Cheltenham racecourse

- 4.2.24 Cheltenham Racecourse is a key part of the cultural and economic infrastructure of Gloucestershire, being the most significant visitor attraction in the JCS area and the wider sub-region. It is of international significance, being the principal venue in the UK for National Hunt Racing, on average bringing £50m p.a. to the Cheltenham economy. Ranking 2nd in the list of racecourses drawing the largest meeting attendances and with high television viewing figures (0.9million watched the Cheltenham festival in 2015), it is clear that the Racecourse and its influence underpins the cultural offer, contributing significantly to the economy of Cheltenham.
- 4.2.25 The Racecourse's primary function as a racing venue brings significant economic benefits to the region in terms of financial income and job creation:
- 450,000 visitors attend the 16 racing fixtures, including the 250,000 over the four days of the most recent Festival in March 2015. It is estimated to contribute £50m p.a. to the local tourism economy, including visitor accommodation (around 10,000 bed spaces for overnight accommodation are required during the Festival).
 - The Racecourse currently employs 85 full time staff on site, with the additional employment of around 5,000 staff during the Festival
 - Contractors and sub-contractors in terms of construction (and associated construction materials) and service providers are based locally in Gloucestershire and the racecourse also generates a significant number of indirect jobs
- 4.2.26 Cheltenham Racecourse is important to the regional economy and local economy, it is therefore important to continue to improve business operations through future development and enhancement, reinforcing its importance as a tourism and visitor attraction in the region with the potential to generate further employment opportunities.

Gloucestershire airport

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

Gloucestershire University

- 4.2.29 In common with other university towns, Cheltenham and Gloucester benefit significantly from the presence of their University. In 2015 the University commissioned research to analyse its economic impact on the region, which indicated that the University brings £151.2m of value to Gloucestershire every year. In addition, the University contributes to the social well-being of the region through community work and volunteering, and to its cultural enhancement through activities including support for festivals and links to the arts sector.
- 4.2.30 In order to thrive, the University needs support to provide sufficient purpose-built accommodation for students, to ensure that it remains competitive in a highly volatile 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.
- 4.2.31 Meanwhile, the University has been adjusting its curriculum to more closely reflect the skills need demanded by the County and working in close liaison with the LEP. The Growth Hub supports new and growing business and is an example of this closer working and is funded through the local growth fund. Future opportunities relate to the growing sectors in cyber security and nuclear industries for which the County has existing advantages.

Tourism

- 4.2.32 There are no specific allocations in the JCS for tourism-related activity but, for all of the Gloucestershire authorities, tourism is an important economic activity and is broadly supported through a range of programmes and initiatives.

- 4.2.33 Tewkesbury Borough includes the Severn Vale and the internationally-renowned Cotswolds and the Borough Council supports the tourism sector through international, national and regional marketing and through business support programmes. Tourism supports jobs in the rural economy as well as supporting the vitality and viability of the market towns of Winchcombe and Tewkesbury. The importance of tourism to the rural economy will be recognised in the emerging Tewkesbury Borough Plan (2011-2031), neighbourhood plans and in the Tewkesbury Borough Economic Strategy.
- 4.2.34 Gloucester's support for tourism is set out in the Growing Gloucester's Visitor Economy 2014 document, a strategic plan for driving growth in the value of Gloucester's visitor economy. This focuses on 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.
- 4.2.35 Cheltenham Borough is currently undertaking a review of its tourism strategy and is likely to focus on building upon the strengths of a collective marketing approach with the Cotswolds (including Tewkesbury) and Gloucester.

Regeneration

- 4.2.36 The reuse and regeneration of sites within the urban areas is a high priority for Gloucester. The full strategy for Gloucester is set out clearly in the Regeneration and Economic Development Strategy 2015 – 2020 document, adopted by the City Council in January 2016. The issue of city centre regeneration in particular will be at the heart of the City Plan, being the key development issue for the City over the next decade and more. Mixed use regeneration initiatives to be delivered in the next decade, including Kings Quarter, Blackfriars and Bakers Quay, will be as important as new greenfield site development on the periphery of the city.
- 4.2.37 The regeneration of Tewkesbury town centre is a key area of work for the Borough Council. A Tewkesbury Town Centre Masterplan: Strategic Framework Document was approved in July 2012, which set out a range of key projects aimed at regenerating the town centre; these include specific projects, such as riverside enhancement, the regeneration of key town centre sites, a new leisure centre, and a programme of marketing and inward investment.
- 4.2.38 The Cheltenham Development Task Force was established in 2010 by Cheltenham Borough Council with its key partners, including Gloucestershire County Council and the Homes and Community Agency; the Task Force is an arm's length advisory body with the purpose of delivering a host of regeneration outputs loosely associated with the former Civic Pride programme. Key achievements include delivery of additional housing, including affordable, the redevelopment of a number of town centre brownfield sites, major uplift and investment to public realm in the town centre, new fit-for purpose office accommodation to enable other sites to be redeveloped in due course, key retail projects and investment in public transport. The Task Force was originally focused on a limited area within the town centre but has recently expanded its remit to cover the wider Borough of Cheltenham; this will enable new projects, such as cyber or tech hub growth ambitions to be actively pursued, which align with both the LEP strategic economic plan, the JCS and emerging components of the Cheltenham plan.

Delivery

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

SD2 - RETAIL AND CITY / TOWN CENTRES

Background

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

Policy SD2 - Retail and City / Town Centres

1. Settlement Hierarchy

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

Key Urban Areas

Gloucester City Centre and Cheltenham Town Centre

Market town

Tewkesbury Town Centre

Rural service centres serving their rural hinterland

Winchcombe Town Centre and Bishop's Cleeve Village Centre.

2. Cheltenham and Tewkesbury Borough Retail Policies

Retail policies within the Boroughs of Cheltenham and Tewkesbury are set out in the saved policies of the existing Local Plans. These policies will be reviewed and taken forward through the immediate review of the JCS retail policy.

Within the Boroughs of Cheltenham and Tewkesbury, new retail development will be encouraged in accordance with the policies in the saved local plans insofar as they are consistent with national planning policy.

3. Gloucester City Centre Boundary, Primary Shopping Area and Shopping Frontages

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

Gloucester City Centre Boundary and Primary Shopping Area

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

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

ii. Primary frontages

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

iii. Secondary frontages

Within the secondary shopping frontage identified, the change of use of premises from A1 retail use to use classes A2 (financial institutions), A3 (restaurants and cafes), A4 (pubs), A5 (hot food takeaway), D1 (non-residential institutions) and D2 (assembly and leisure) will be permitted provided that it would not have a significant adverse impact on the amenity of adjacent residents or businesses.

4. Retail Floor Space Requirements

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

Comparison goods

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

Convenience goods

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

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

5. Key principles for development in centres

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

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

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

7. Retail Review

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

This policy contributes towards achieving Objective 2.

Explanation

- 4.3.3 In the JCS area, there is a range of centres providing different roles and functions. The two main urban centres are Gloucester City and Cheltenham Town, which offer the widest range of shopping opportunities and attract people from a significant distance.
- 4.3.4 Cheltenham town centre is a particularly strong retail centre which supports traditional high street stores alongside independent retailers and high-end boutiques and galleries; this forms an important element along with its heritage assets for tourism. As such, it performs within the sub-regional context and is second only to Bristol in the South West in terms of shopping choice on offer. It is important therefore that this is recognised, protected and, where possible, enhanced. Investment is ongoing, focused on bringing forward improvements to create better linkages between the High Street, Promenade and Lower High Street shopping areas.
- 4.3.5 Gloucester City centre has a smaller catchment but nevertheless provides a good range of shops and is performing well for a city of its size, offering good services and facilities, along

with key heritage assets of national importance such as Gloucester Cathedral, which attracts significant numbers of visitors.

- 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.
- 4.3.7 Gloucester City Council has an adopted 'Regeneration and Economic Development Strategy' (January 2016), which sets out a range of regeneration sites and priorities, many of which are already making good progress. This includes for example the King's Quarter area, which will provide a new, modern bus station as part of an integrated public transport interchange, as well as other main town centre uses including retail and leisure. It is important these regeneration proposals are prioritised and protected from inappropriate developments elsewhere.
- 4.3.8 Tewkesbury town is an important designated centre in the JCS and the primary service centre in the Borough. However, in accordance with its status as a market town, it provides a more localised function which includes the catchment of the town and the surrounding rural hinterland. Tewkesbury has a proactive regeneration partnership which brings together public, private and community organisations to deliver economic prosperity and environmental quality for the town. The partnership works to coordinate, support and facilitate the delivery of the Tewkesbury Town Centre Masterplan and projects that contribute to the future improvement of the town including the continued improvement of its retail offer.
- 4.3.9 Within Tewkesbury Borough, smaller rural service centres, such as Winchcombe and Bishop's Cleeve, provide for their residents and the residents of surrounding rural areas. Winchcombe and Tewkesbury also function as important tourist destinations.
- 4.3.10 The policy set out above has been prepared in the context of the NPPF and Planning Practice Guidance. It is underpinned by evidence contained in the JCS Retail Study (Phase 1, 2011) and the JCS Retail Study (2015). This identifies floorspace requirements for comparison goods (clothes, furniture etc) and convenience goods (food) for each of the main settlements identified in the hierarchy up to 2031. The Retail Study (Phase 1) also provided an analysis of the health of the different designated centres in the JCS area. This understanding of the health of the different town centres has helped to inform policy at JCS level and will also form a key part of the evidence in preparing the district plans.
- 4.3.11 For Gloucester City Centre, the policy identifies the Primary Shopping Area, primary and secondary shopping frontages and the City Centre boundary, and which uses will be supported in the different locations. It also sets out the approach for proposals for retail and other main town centre uses, located outside of these areas. For centres located in Cheltenham Borough and Tewkesbury Borough, saved policies in the Local Plans will be used.
- 4.3.12 Following the adoption of the JCS, this policy will be subject to an immediate review.

Delivery

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

SD3 - SUSTAINABLE DESIGN AND CONSTRUCTION

Background

- 4.4.1 The built environment plays a key role in all aspects of sustainability. It directly affects the quality of life of those who live in, visit and enjoy the JCS area. Development proposals must be designed and constructed in such a way as to maximise the principles of sustainability both as they relate to individual buildings and to the integration of new development with new and existing communities.
- 4.4.2 Development has a significant and direct impact on the environment, through the use of finite natural resources such as water and minerals, in addition to the generation of carbon emissions and waste. Sustainable design and construction seeks to use these resources efficiently and decrease waste both during the construction, use and decommissioning phases of development schemes. The use of sustainable design and construction techniques can affect how a community grows, and serves to foster knowledge and care for the natural environment and resources.
- 4.4.3 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.

Policy SD3: Sustainable Design and Construction

- 1. Development proposals will demonstrate how they contribute to the aims of sustainability by increasing energy efficiency, minimising waste and avoiding the unnecessary pollution of air, harm to the water environment, and contamination of land or interference in other natural systems. In doing so, proposals (including changes to existing buildings) will be expected to achieve national standards.***
- 2. All development will be expected to be adaptable to climate change in respect of the design, layout, siting, orientation and function of both buildings and associated external spaces. Proposals must demonstrate that development is designed to use water efficiently, will not adversely affect water quality, and will not hinder the ability of a water body to meet the requirements of the Water Framework Directive.***
- 3. All development will be expected to incorporate the principles of waste minimisation and re-use. Planning applications for major development must be accompanied by a waste minimisation statement, which demonstrates how any waste arising during the demolition, construction and subsequent occupation of the development will be minimised and sustainably managed.***
- 4. To avoid unnecessary sterilisation of identified mineral resources, prior extraction should be undertaken where it is practical, taking into account environmental acceptability and economic viability relating both to extraction of the mineral(s) and subsequent implementation of the non-minerals development of the site.***
- 5. Major planning applications must be submitted with an Energy Statement that clearly indicates the methods used to calculate predicted annual energy demand and associated annual Carbon Dioxide (CO₂) emissions.***

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

Explanation

- 4.4.4 Whilst minimum standards for sustainable construction are delivered through the building control framework and required for all developments, applicants are encouraged to meet higher standards wherever possible, and doing so may increase the sustainability of the proposal as a whole.
- 4.4.5 Energy efficiency and the use of decentralised and renewable or low carbon energy is only one aspect of sustainable design and construction. It is also important to ensure that high standards of water efficiency are achieved along with other measures such as recycling construction materials, provision for the recycling of household waste, the use of sustainably-sourced materials, and the protection and enhancement of ecological features on a development site.
- 4.4.6 Global temperatures are projected to continue rising, bringing changes in weather patterns, rising sea levels and increased frequency and intensity of extreme weather for the UK (DEFRA 2010). Therefore, adaptation to reduce the impact of climate change will be necessary, for example through flood mitigation, heat proofing, open space provision, shading, water retention for irrigation, landscaping, and associated measures.
- 4.4.7 The Gloucestershire Waste Core Strategy was adopted in November 2012 and forms part of the statutory development plan. Policy WCS2 of the Waste Core Strategy specifically sets out how waste reduction should be considered, including through new development, over the JCS area as well as the rest of county. This policy is supported by adopted Supplementary Planning Document (SPD) entitled 'Waste Minimisation in Development Projects'. The SPD has been endorsed by the JCS authorities and will be used in decision-taking.
- 4.4.8 Mineral resources present within the JCS area include sand and gravel, clay and limestone. To avoid the unnecessary sterilisation of these important mineral resources, the Minerals Local Plan for Gloucestershire (prepared by the County Council as the Minerals Planning Authority - MPA) is required to define Minerals Safeguarding Areas (MSAs) and set out appropriate policies for managing development. Once designated, these will be shown on the Minerals Local Plan for Gloucestershire proposals map and incorporated into the JCS proposals map when it is next reviewed. Applicants for non-minerals development, which may sterilise mineral resources, will be required to carry out a mineral assessment in consultation with the MPA. In the interests of sustainable development, where it is environmentally and economically viable, practical and acceptable to do so, provision will need to be for the prior extraction of minerals, and wherever possible this should be used within the new development.
- 4.4.9 With regard to localised energy creation, the NPPF states that to help increase renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources.

Delivery

- 4.4.10 In order to ensure development is adaptable to climate change, proposals should have regard to the following non-exhaustive list of requirements:
- Minimisation of flood risk by appropriate siting, drainage, and treatment of surface areas to ensure rain water permeability in compliance with Policy INF2.

- Reduction in urban heat island effect through the use of Green Infrastructure elements such as living roofs and walls surfaced with plants or grass, increased tree cover including planting of street trees, and use and construction of water flows in compliance with Policy INF3.
- The need to control overheating of buildings through passive design in compliance with Policy SD4.

Appropriate use of these features can also help to contribute to energy efficiency and CO₂ emissions reduction, as well as potentially bringing amenity and biodiversity benefits.

- 4.4.11 Before considering the use of renewable energy technologies, the design of a development should first identify measures to reduce overall energy demand. This can include choice of building fabric and construction techniques, optimising solar gain, natural lighting and ventilation to reduce the need for space heating and/or cooling and lighting. Secondly, the design should include measures to use energy more efficiently such as increasing levels of insulation in walls, floors and roofs and improved air-tightness.
- 4.4.12 Major planning applications are defined for the purposes of this policy as either 10 or more dwellings (or residential development on a site larger than 0.5 hectare), or for any other type of development where the floorspace exceeds 1,000 square metres or site area is 1 hectare or more. In these cases, applicants will need to prepare and submit both a Waste Minimisation Statement and Energy Statement to the local planning authority at the same time as any application.
- 4.4.13 For calculation purposes, energy demand should be converted to CO₂ emissions. Major planning applications must be submitted with an energy statement that clearly indicates the methods used to calculate predicted annual energy demand and associated annual CO₂ emissions. It should also include the calculations used to determine the renewable energy requirements based on the annual CO₂ emissions.
- 4.4.14 Delivery of the elements of this policy will come through effective development management practices.

SD4 - DESIGN REQUIREMENTS

Background

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

Policy SD4: Design Requirements

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

- i. Context, Character and Sense of Place**
New development should respond positively to, and respect the character of, the site and its surroundings, enhancing local distinctiveness, and addressing the urban structure and grain of the locality in terms of street pattern, layout, mass and form. It should be of a scale, type, density and materials appropriate to the site and its setting. Design should establish a strong sense of place using streetscapes and buildings to create attractive and comfortable places to live, and having appropriate regard to the historic environment
- ii. Legibility and Identity**
New development should create clear and logical layouts that create and contribute to a strong and distinctive identity and which are easy to understand and navigate. This should be achieved through a well-structured and defined public realm, with a clear relationship between uses, buildings, routes and spaces, and through the appropriate use of vistas, landmarks and focal points
- iii. Amenity and Space**
New development should enhance comfort, convenience and enjoyment through assessment of the opportunities for light, privacy and external space, and the avoidance or mitigation of potential disturbances, including visual intrusion, noise, smell and pollution
- iv. Public Realm and Landscape**
New development should ensure that the design of landscaped areas, open space and public realm are of high quality, provide a clear structure and constitute an integral and cohesive element within the design. The contribution of public realm designs, at all scales, to facilitate the preferential use of sustainable transport modes should be maximised
- v. Safety and Security**
New development should be designed to contribute to safe communities including reducing the risk of fire, conflicts between traffic and cyclists or pedestrians, and the likelihood and fear of crime
- vi. Inclusiveness and Adaptability**
New development should provide access for all potential users, including people with disabilities, to buildings, spaces and the transport network, to ensure the highest standards of inclusive design. Development should also be designed to be adaptable to changing economic, social and environmental requirements

vii. Movement and Connectivity

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

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

2. Detailed requirements of masterplans and design briefs, should the local planning authority consider they are required to accompany proposals, are set out in Table SD4d. These requirements are not exhaustive.

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

Explanation

4.5.4 The quality of our lives is determined in part by the condition of our surrounding environment. Quality of place has an important role in attracting and retaining people, and contributes to the overall quality of life. Urban, architectural and landscape design quality, and the conservation of the historic and natural environment, are key elements in creating positive and inspiring places for people. Guidance on some of these elements, together with requirements for design briefs and masterplans prepared by developers is provided in Tables SD4a-d below. Prospective developers are advised to have regard to this guidance in meeting the policy requirements set out above.

4.5.5 Good design, including appropriate attention to detail, typically makes the difference between a high-quality and successful development and a mediocre or unsuccessful one. Development at any scale and location should make a positive contribution to providing better places for communities. The quality of the local environment can also play a crucial role in the economic success of an area.

4.5.6 The JCS area encompasses a wide variety of settlement types, whose scale and character varies considerably. Each of these settlements presents a distinctive character and identity, with many containing important heritage assets, highly-valued green infrastructure and/or built environments that are of considerable quality.

4.5.7 Well-designed buildings and urban spaces help create a sense of place and identity and contribute to civic pride. The consideration of local distinctiveness through high-quality

design is essential within the design process and can be achieved either by adding to what is locally distinctive or by creating a new sense of place, where this is appropriate.

- 4.5.8 Design plays an important role in shaping a healthy and safe environment and can contribute to healthy and active lifestyles. This is not only through the construction of high-quality buildings and public realm but also through the provision of open spaces and other green infrastructure.
- 4.5.9 Good design also has a fundamental role in providing safe and secure living environments. This encompasses reducing fear of crime, providing functional solutions to improve security, and reducing the risk of fire. Reference to the principles of the UK Police’s Secured by Design toolkit and other extant relevant guidance will help in providing safe and secure living environments.
- 4.5.10 To promote healthier lifestyles, assist in climate change mitigation, minimise the volume of car-based travel on the existing highway network, and enhance the offer of the wider transport network, new developments in or adjacent to urban areas should be designed to promote the use of alternatives to the car. Where infrastructure to enable alternatives does not exist, consideration should be given to its provision where feasible and financially viable.
- 4.5.11 Table SD4a is an assessment hierarchy and is not a hierarchy of provision. The aim, through its application, is to help deliver decisions about development design that seek as a matter of course to reduce CO₂ and other harmful emissions and promote healthier lifestyles through encouraging walking, cycling and public transport use where possible.

Table SD4a

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

Table SD4b

Principles of Urban Design
<p>Character</p> <ul style="list-style-type: none"> • create or reinforce a sense of place with its own distinctive identity • reflect existing topography, landscape and ecology • utilise a hierarchy of building form and design to reflect the use and importance of buildings • create focal points and places, that signal clear nodes for sustainable movement • create areas of hard and soft landscaping. <p>Continuity and enclosure</p> <ul style="list-style-type: none"> • use buildings and trees to define space • distinguish clearly between public and private spaces, providing continuous building frontages between them where possible.

Quality of the public realm

- create attractive spaces which provide a variety of interest and experience
- produce comfortable local microclimates
- provide overlooking of streets and spaces, especially main elevations
- design lighting and landscaping to reduce opportunities for crime
- enrich space with well-designed details (e.g. paving, public art, lighting, signs, seats, railings, cycle parking, bus shelters and other street furniture)
- avoid visual clutter and confusion, especially from signs and advertisements
- design areas for ease of maintenance, particularly in regard to litter collection, mechanical sweeping, and the maintenance of planted areas.

Ease of movement

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

Legibility

- develop a clear, easily understood image of an area
- retain and create views of existing and new landmarks, skylines and other focal points
- provide recognisable and memorable features, especially at key locations.

Durability

- create spaces that can adapt easily to changes in need and use
- provide environments which are suitable for their use
- use materials that are fit for purpose as well as attractive.

Diversity

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

Table SD4c

Principles of Architectural Design
<p>The architectural design of new buildings and alteration of existing buildings should demonstrate a creative response to a specific site and locality. Particular attention should be paid to:</p> <p>Function</p> <ul style="list-style-type: none"> • fitness for purpose. <p>Character</p> <ul style="list-style-type: none"> • historical context • distinctive features of the locality (such as spatial quality, rhythms, density, scale, style and materials). <p>Layout</p> <ul style="list-style-type: none"> • the urban grain (the pattern and density of routes, street blocks, plots, spaces and buildings of a locality) and topography of an area • the efficient use of land.

Scale

- the size of the building, its elements and its details in relation to its surroundings and the human form
- massing (the arrangement, volume and shape of a building)
- height (its effect on shading, views, skylines and street proportion).

Appearance

- materials (high quality and suited to their location and purpose)
- detailing.

Landscape

- the integration of buildings and landscape.

Table SD4d

Masterplans and Design Briefs to be provided to support planning applications will encompass:	
(i)	<p>A vision which should:</p> <ul style="list-style-type: none"> • Exhibit a high level of ambition and design quality for the creation of tomorrow's places which could be created building on the overall vision for the district and town • Show how the vision is guided by achieving a distinctive identity and a strong sense of place that is derived from an understanding of the characteristics of the site, its history and its geography. This will be essential in ensuring the delivery of a place which demonstrates an enduring quality.
(ii)	<p>A masterplan which should:</p> <ul style="list-style-type: none"> • Demonstrate a robust design process including an in-depth assessment of the site and its context and constraints, and identifying those issues that have informed the vision for and design of the development • Show how consultation with the existing community has been incorporated • Show that the design requirements of the scheme work within the vision, and clearly demonstrate how the vision may be achieved • Define and respond to local context and create or reinforce local distinctiveness • Demonstrate a consideration of heritage assets and their setting, assessing the effects of the proposed development and measures proposed to avoid substantial harm • Show a clear development structure and design concept that facilitates and encourages the delivery of all amenities, services and behaviours needed to support sustainable lifestyles • Explain the key elements and development principles of the masterplan to create a simple, robust and structuring framework for development that fixes land use and density, movement and connectivity, and open space and landscape • Set out the extent to which it is attempting to impose uniformity across the development areas • Contain strategic urban design principles that will be used to inform subsequent detailed designs, securely founded on good practice in terms of form, function and on-going management • Adequately set out the design quality standards for architecture, public realm and landscape • Contain a mechanism for delivering the vision at more detailed stages, for example design coding.
(iii)	<p>A design brief which should demonstrate:</p> <ul style="list-style-type: none"> • Good levels of integration with the surrounding area both built and natural, in particular maximising existing and potential movement connections with the existing environment to encourage walking, cycling and use of public transport • A quality of development that creates a positive sense of place and identity through the application of high-quality urban, architectural and landscape design • High level of accessibility to community facilities and local services, including facilitating access to, and where appropriate, efficient routing for high quality public transport • Community facilities, suitable infrastructure and other amenities to meet the needs of all the community, including the provision of education and training facilities, health care, community, leisure and recreation facilities • A clear structure of open spaces and landscape network to ensure that open space standards are met and that the new spaces relate well to each other and to existing areas • How sustainability matters addressed by other policies of the development plan and the NPPF and national PPG - such as those relating to biodiversity, climate change, flooding, historic environment, waste and pollution, safety, green space, and culture and tourism -

have been taken into account, including the efficient use of resources both during construction and when the development is complete.

Delivery

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

SD5 – GREEN BELT

Background

- 4.6.1 Green Belt is a policy designation which keeps land permanently open to prevent urban sprawl. The Green Belt in the JCS area seeks to prevent the coalescence of Cheltenham and Gloucester, and Cheltenham and Bishop's Cleeve. The Green Belt serves five purposes:
- To check the unrestricted sprawl of large built-up areas
 - To prevent neighbouring towns merging into one another
 - To assist in safeguarding the countryside from encroachment
 - To preserve the setting and special character of historic towns
 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 4.6.2 Throughout the development of the JCS, we have consulted on the spatial strategy for the plan. The history of the consultations on this issue is included in the JCS Spatial Options Topic Paper 2013 which is available to view as part of the JCS evidence base. The principle of urban extensions to Cheltenham and Gloucester has consistently been deemed the most sustainable throughout the history of this work, and no other option has gained significant support during consultation. When alternative options, such as creating a new large settlement in the JCS area, or significant rural redistribution, have been tested through Sustainability Appraisal, they have performed poorly. Further information on the consultation and sustainability testing of alternative spatial strategies can be found in the JCS Spatial Options Topic Paper.
- 4.6.3 In order for Cheltenham and Gloucester to grow, both in population and economically, land must be made available for sustainable urban extensions. To fail to do so would significantly limit future opportunities for new housing and jobs. Given that development of strategic scale would normally be unsuitable because of the landscape designation status of the AONB and in areas of heightened flood risk in accordance with the NPPF, the Green Belt is the only available reasonable option for urban extensions in most cases within the JCS area. It is for these reasons the Councils considered a Green Belt review was appropriate.
- 4.6.4 The JCS authorities commissioned AMEC to carry out a Green Belt Assessment in 2011 which is available to view as part of the JCS evidence base. This work represents the most up-to-date evidence on this topic and provides an independent evaluation of the wider Green Belt within the JCS area. It is a comprehensive assessment which considers how strategic segments of the Green Belt perform against the purposes of including land within Green Belt.
- 4.6.5 The work of AMEC follows from and assesses the Cheltenham Green Belt Review (2007) undertaken by AERC. This earlier study assesses the Green Belt within Cheltenham Borough only.
- 4.6.6 The process by which the Green Belt Assessment was used to inform the selection of broad locations and strategic allocations for development is detailed in the JCS 2013 Strategic Allocations Report (Examination Document EBLO102).
- 4.6.7 The Green Belt in the JCS area was a significant topic of discussion as part of the JCS examination. Further work was undertaken by the JCS authorities and is set out in the

'Green Belt topic paper' (examination document 142) and the 'Green Belt, Safeguarded Land and Spatial Strategy Update Paper' (examination document 196). The JCS reflects this further work.

Policy SD5: Green Belt

1. *To ensure the Green Belt continues to serve its key functions, it will be protected from harmful development. Within its boundaries, development will be restricted to those limited types of development which are deemed appropriate by the NPPF, unless very special circumstances can be demonstrated. That is: 'whether very special circumstances exist to outweigh the harm automatically caused to the Green Belt by virtue of the development being inappropriate and any other harm actually caused'.*
2. *The boundaries of the reviewed Green Belt are identified on the Proposed Changes to the Green Belt Boundary map.*

Consideration will be given to a limited review of the Green Belt in other locations as necessary through the Borough Plans, where this is justified by exceptional circumstances.

3. *Gloucestershire Airport, Cheltenham Racecourse, existing waste management facilities in the Green Belt operating in accordance with extant planning permission, and the waste management sites allocated in the Gloucestershire Waste Core Strategy, are designated as developed sites within the Green Belt that are acknowledged as having wider benefits where the co-location of facilities can be determined as essential to their use. Notwithstanding this, further development in any of these locations will need to meet the requirements of Green Belt policy in the NPPF and /or National Planning Policy for Waste, be in accordance with the Development Plan, and not compromise the openness of the Green Belt or increase the risk of urban sprawl.*

4. Gloucestershire Airport

- i. *Gloucestershire Airport is shown on Inset Map 1*
- ii. *In the Essential Operational Area of the airport, new structures, buildings or extensions to buildings will only be permitted if they are essential to the operation of the airport and require an airport location*
- iii. *Elsewhere within the airport, in the Non-Essential Operational Area, business uses which support the airport will be permitted.*

5. Cheltenham Racecourse

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

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

6. Waste Management Sites

The Gloucestershire Waste Core Strategy allocates sites for waste recovery facilities, including within the Green Belt. Future waste development on allocated sites in the Green Belt should be in accordance with Development Plan, and be consistent with the NPPF and National Planning Policy for Waste.

7. Safeguarded Areas

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

This policy contributes towards achieving Objective 4

Explanation

- 4.6.8 The NPPF allows the review of Green Belt boundaries in exceptional circumstances. Part of these requirements are that local planning authorities take account of the need to promote sustainable patterns of development by: not including land which it is unnecessary to keep permanently open, being satisfied that Green Belt boundaries will not need to be altered at the end of the Development plan period, and identifying areas of ‘safeguarded land’ between the urban area and the Green Belt for development beyond the plan period.
- 4.6.9 The justification for amending the Green Belt boundary to meet objectively assessed housing and employment needs, and the process that was followed to reach these decisions, are set out in Policy SP2 and its supporting text. Where Green Belt boundaries have been altered, the emphasis has been on identifying a firm boundary, such as a road, building line or watercourse in accordance with the NPPF. These boundaries have been clearly defined using physical features that are readily recognisable and likely to be permanent.
- 4.6.10 The Green Belt boundary has been altered to accommodate strategic allocations at A1, A2, A3, A4 and A7 as set out in policy SA1 and on the Key Diagram.

- 4.6.11 The new boundaries identified on the Green Belt map have also taken into account longer-term need by identifying safeguarded land which may be required beyond this plan period to ensure that the Green Belt does not need an early review. The safeguarded areas for future growth have been located in an area where the threat of coalescence between Gloucester and Cheltenham, and between Cheltenham and Bishop's Cleeve, is reduced, and where new development can be fully integrated into the existing urban form.

Developed sites within the Green Belt

- 4.6.12 Gloucestershire Airport is a general aviation airport that handles 90,000 aircraft movements every year, many for business purposes. The JCS supports the Strategic Economic Plan for Gloucestershire which states: "the Local Enterprise Partnership aims to optimise the contribution and benefit that Gloucester Airport and the land around it can make to local communities and the economy".
- 4.6.13 Gloucestershire Airport is an appropriate use within the Green Belt and is regarded as a key regional asset and as such the policy seeks to support this role. Because of the airport's location in the Green Belt, new development will need to be principally airport-related, although this would not necessarily preclude its use for other activities where these are appropriate Green Belt uses. Within the functional airport area, only essential airport operational structures are to be located in order to retain the openness of the Green Belt. An airport-related use is one for which an airport location is essential for its operation, for example, terminal buildings, hangars, other essential storage buildings, control towers, areas for handling air freight, and parking facilities associated with the airport.
- 4.6.14 Cheltenham Racecourse is an appropriate use within the Green Belt and is the principal venue in the country for National Hunt Racing. The racecourse management continually strives to improve facilities for race-goers, through redevelopment or the construction of new buildings. Proposals of this nature will need to be assessed in relation to the national significance of the venue as well as Green Belt policy. In order to assess the impact on the surrounding area of open air activities or other forms of recreation or gathering, Cheltenham Borough Council may wish to grant temporary permissions in the first instance.
- 4.6.15 Because of the Racecourse's location in the Green Belt, new development will need to be well related to the business of the Racecourse. For example new hotel or conferencing buildings may be permitted within the Racecourse Policy Area, so long as these do not detract from or limit the current use or future growth of the area for horse racing.
- 4.6.16 The Cheltenham Racecourse policy area has been amended from that shown in the 2006 Cheltenham Plan to allow for further growth of facilities required for the business of the Racecourse.
- 4.6.17 The Green Belt accommodates existing waste management facilities. It also contains allocated sites for facilitating the development of strategic residual waste recovery facilities as set out in the adopted Gloucestershire Waste Core Strategy. Waste allocations within the Green Belt are for the purpose of contributing towards ensuring there is sufficient provision to meet forecast local needs for waste management infrastructure in Gloucestershire up to 2027. Future development proposals on waste allocations within the Green Belt will normally be determined by the local Waste Planning Authority (WPA).

- 4.6.18 All such proposals should be in accordance with the Development Plan and be consistent with the NPPF and National Planning Policy for Waste unless very special circumstances can be demonstrated. A lack of suitable and available non – Green Belt sites; the demonstration of particular locational needs such as proximity to main waste arising; and a beneficial operating relationship with existing waste management facilities are matters, along with the relative sensitivity of the Green Belt to development in relation to its five purposes should be taken into account when determining whether very special circumstances could exist in relation to future waste management proposals.

Other amendments to the Green Belt boundary

West Cheltenham

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

South West Cheltenham

- 4.6.20 A small change has been made to the Green Belt boundary at the south west of Cheltenham (known as the former M&G site) to provide a more appropriate boundary after an implemented permission.
- 4.6.21 A small change has been made to the Green Belt boundary in the area of the Reddings to provide a more appropriate boundary after an implemented permission at Grovefield Way.

North Gloucester

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

Safeguarded land

- 4.6.24 The new boundaries identified on the Green Belt map have also taken into account longer-term need by identifying safeguarded land which may be required beyond this plan period to ensure that the Green Belt does not need an early review. The safeguarded areas for future growth have been located in an area where the threat of coalescence between Gloucester and Cheltenham, and between Cheltenham and Bishop's Cleeve, is reduced, and where new development can be fully integrated into the existing urban form.
- 4.6.25 Safeguarded areas are not allocated for development at the present time. Planning permission for the permanent development of safeguarded land will only be granted following a review of the JCS except for uses that would not be deemed inappropriate within the Green Belt.
- 4.6.26 A significant constraint on the safeguarded land at West Cheltenham is the operation of Hayden Sewage Treatment Works, which is a long-established site with an area of around 22 hectares. The Sewage Treatment Works has been upgraded in recent years, but still emits odours which have the potential to seriously affect any developments that occur nearby.

- 4.6.27 Currently an area in the Green Belt around Hayden Sewage Treatment Works is identified in the Cheltenham and Tewkesbury Local Plans as a Development Exclusion Zone. The JCS on adoption will replace this designation with a similar area identifying the need for Odour Monitoring. Odour modelling work through the statement of common ground between the JCS authorities and the West Cheltenham Consortium has shown that the full area covered by the zone need not entirely exclude development, and proposals will need to demonstrate where development, with appropriate mitigation can take place. In parallel to reducing odour emissions, Severn Trent is committed to the future development opportunities associated with this site. This includes ongoing assessment of the viability of whole sale relocation of the existing treatment works. In time, this would enable the entire area of the Safeguarded Land to be released for development. On review of the JCS as work advances on the West Cheltenham Site, the Odour Monitoring Zone could be reduced or removed in accordance with the evidence base and mitigating works undertaken as part of the development of the allocation.
- 4.6.28 The designation of the Odour Monitoring Zone in the JCS at West Cheltenham does not prevent development at the West Cheltenham strategic allocation except where such development would be significantly affected by odours. Further work through the master planning of the development along with appropriate mitigation will facilitate the development of the site. Decision takers should weigh the evidence presented as to the impact of odour on a particular proposal in this area, taking into account policy SD14 Health and Environmental Quality of the JCS, and relevant advice from the Environment Agency or other expert body.
- 4.6.29 An area of Safeguarded Land has been identified at Twigworth adjacent to land that has been included as a strategic allocation at this location. In making an allocation at Twigworth and removing it from the Green Belt it has been necessary to identify new Green Belt boundaries that are strong and defensible. At Twigworth the boundaries have been redrawn using the well-defined features of Frog Furlong Lane, Dowth Hatherley Lane and the Tewkesbury Road (A38). However, the resulting area to be removed from the Green Belt is larger than the development site that is available for allocation now through the JCS. As the remaining area is not available for development, but would be removed from the Green Belt, it has been identified as Safeguarded Land which could provide a potential development option in future through a review of the JCS.

Delivery

- 4.6.30 Delivery of this policy will be furthered by development management and enforcement procedures to ensure the on-going protection of the Green Belt from inappropriate development.

SD6 – LANDSCAPE

Background

- 4.7.1 The JCS area contains a wide variety of landscapes, ranging from the Cotswolds Area of Outstanding Natural Beauty (AONB) in the east to the River Severn and its floodplain in the west. The different landscapes have been characterised by landscape assessment work, which forms a baseline against which change can be measured. Landscape character is defined as the distinct and recognisable pattern of elements that occur consistently in a particular type of landscape. It is based on the combination and relationships between the physical features of the landscape such as landform, geology, soils, ecology and vegetation, land use and human settlement. It creates a particular sense of place for different areas of the landscape.
- 4.7.2 The landscape of the JCS area provides the setting for its towns and villages. Landscape character is a key component of an area's identity and development will be required to respect it. Landscape proposals for new development should be appropriate to the landscape character of the locality and contribute to local distinctiveness.

Policy SD6: Landscape

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

This policy contributes towards achieving Objectives 4 and 9.

Explanation

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

NPPF where, together with protection of nationally designated landscape areas, government requires the planning system to protect and enhance within the local environment 'valued landscapes, geological conservation interests and soils'.

- 4.7.4 The relevant Landscape Character Assessments (LCAs) for the JCS area are those for The Cotswolds AONB and for Gloucestershire as a whole. The Gloucestershire LCA divides the county into landscape character areas and identifies a number of different landscape types and the key issues for their conservation and enhancement. The findings of the LCA are a key factor to be considered in the design of developments and in assessing their impacts.
- 4.7.5 In the urban fringe areas, a Landscape Characterisation and Sensitivity Analysis (LCSA) has been undertaken. This identifies in more detail the landscape character and sensitivity of potential development sites around Gloucester, Cheltenham and Tewkesbury. It should be used to assess the impact of developments in the urban fringe areas. The analysis grades sensitivity in five categories from low to high with high-medium and high categories being particularly sensitive to development.
- 4.7.6 In areas outside the area covered by the LCSA, the local planning authority will advise whether an assessment should be included with an application for development to demonstrate that sensitivity has been taken into account.
- 4.7.7 It is important that landscape character is assessed in process terms separately from visual impact in evaluating the potential impact of development. These two elements, when considered together, enable an assessment to be made of the sensitivity to change of different landscapes.

Delivery

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

SD7 – THE COTSWOLDS AREA OF OUTSTANDING NATURAL BEAUTY

Background

- 4.8.1 The Cotswolds Area of Outstanding Natural Beauty (AONB) is the largest AONB in the country. Its management is co-ordinated through The Cotswolds Conservation Board. The NPPF confers on AONBs protection from major development, making clear that permission should only be granted in exceptional circumstances and where it can be demonstrated to be in the public interest. For the purposes of Policy SD7, whether or not a proposal constitutes major development will be considered as set out at Paragraph 4.8.4 below. Detailed policies for the management of development in or affecting the AONB may be set out in relevant district plans.

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

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

This policy contributes towards achieving Objectives 4 and 9.

Explanation

- 4.8.2 The Cotswolds AONB is nationally designated for its landscape importance. Each local authority has a statutory duty under the Countryside and Rights of Way Act 2000 (Section 85) to 'have regard to the purpose of conserving and enhancing the natural beauty of the AONB'. In fulfilling this duty, Cheltenham and Tewkesbury Borough Councils will continue to work in conjunction with the Cotswolds Conservation Board. The Board has prepared the Cotswolds AONB Management Plan 2013-2018 to guide its management. The Management Plan is supported by more detailed guidance on a range of topics including a landscape strategy and associated guidance underpinned by the Cotswolds AONB Landscape Character Assessment. The Management Plan and guidance are material considerations in determining planning applications in or affecting the AONB.
- 4.8.3 Development close to, but outside, the AONB boundary has the potential to have a detrimental impact on its setting through, for example, its impact upon key views, or its impact upon landscape character in and around the AONB boundary. Proposals likely to affect the setting of the AONB must fully consider any potential impacts.
- 4.8.4 Major development can be defined in quantitative terms – a threshold number of dwellings, for example. However, it follows from appreciation of the JCS area's varied natural form that consideration of what constitutes 'major' development is both a matter of context and a matter of fact and degree: what is deemed to be 'major' in one area may not be deemed to be so in another. The sensitivity of The Cotswolds AONB and its setting is a good example. The JCS therefore does not provide a quantitative definition of 'major development' here as this would be misleading and inflexible within the context of a policy largely concerned with

qualitative issues. Where Policy SD7 is invoked, it will therefore be a matter for the determining authority to advise applicants as to whether or not their proposal constitutes major development.

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

SD8 – HISTORIC ENVIRONMENT

Background

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

Policy SD8: Historic Environment

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

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

Explanation

- 4.9.5 The three districts in the JCS area individually enjoy and collectively share elements of an historic and cultural identity and a strong sense of place. Distinctive elements of the historic environment include, but are not limited to:
- i. Historic cores and their settings within the key urban areas
 - ii. Historic suburbs and their settings within the key urban areas
 - iii. Smaller historic settlements and their settings both within Tewkesbury Borough and on the edges of Gloucester and Cheltenham (including former villages)
 - iv. Areas of Victorian and Edwardian development which survive with a high degree of integrity, including terraced housing and its associated amenities
 - v. Areas of extensive suburban development which date from before the Second World War, including public housing and private developments of semi-detached and detached housing
 - vi. Public open spaces, including Victorian and Edwardian municipal parks, and gardens and cemeteries
 - vii. Private open spaces including those associated with ecclesiastical, educational, canal, dockside or riverside uses
 - viii. The Gloucester and Sharpness Canal and its associated infrastructure of dockland ancillary buildings and structures

- ix. Buildings, structures and archaeological remains of traditional countryside skills, traditional manufacturing, traditional transportation, and associated practices
 - x. Archaeological evidence of the development of the JCS area, including its urban and rural settlements, individual archaeological sites and structures, the wider historic landscape, and those currently unidentified heritage assets that may be discovered in the future
 - xi. The vernacular architecture of the Cotswolds and the Severn valley
- 4.9.6 New development should complement and relate to its surroundings, not only in terms of its appearance but also in the way that it functions. This will require developers to consider the relationships between buildings, relationships of buildings to their settings, and relationships with adjacent land uses and the wider landscape, all of which contribute to local character and distinctiveness.
- 4.9.7 Heritage assets are a major factor in defining local character and distinctiveness. They also contribute to the success of the local economy by generating inward investment and tourism, which in turn helps to secure the long-term future of our heritage.
- 4.9.8 Designated heritage assets include world heritage sites, scheduled monuments, listed buildings, protected wreck sites, registered parks and gardens, registered battlefields, and conservation areas designated under the relevant legislation. Undesignated heritage assets include archaeological sites, historic designated landscapes, historic buildings and other structures including local listing.
- 4.9.9 The JCS authorities and their partners, including Gloucestershire County Council and Historic England, maintain an evidence base relating to the historic environment. This is an important source of information for developers. It also informs local strategies, initiatives and partnership projects associated with the conservation and enhancement of the historic environment, regeneration and place shaping, as well as the development management process. The evidence base includes Historic Environment Records maintained by Gloucestershire County Council and Gloucester City Council; Conservation Area Character Appraisals and Management Plans for each local authority; local listing including Cheltenham's Index of Buildings of Local Interest; Heritage at Risk registers held by English Heritage and supplemented by local records; Gloucestershire Historic Landscape Characterisation and other assessments of landscape character and sensitivity (refer to Policy SD6); and information held by the Gloucestershire Records Office.
- 4.9.10 The JCS Historic Environment Assessment has also been undertaken in order to provide a review of the historic environment at Strategic Allocations. The assessment is based on existing archaeological and historical records and surveys of built heritage and historic landscape character. It considers the impact of potential development on the historic environment resource within and surrounding each of the strategic allocation areas. It also provides advice on planning requirements and on further assessments that will need to be carried out prior to development, as well as suggesting mitigation measures. Development proposals at Strategic Allocations must have regard to the findings and recommendations of the JCS Historic Environment Assessment (or any subsequent revision).

Delivery

- 4.9.11 The NPPF provides a framework for conserving and enhancing the historic environment, which sits alongside a range of legislative regimes associated with planning and heritage. Policy SD8 reinforces that framework. To ensure that the historic environment makes a

positive contribution towards wider social, cultural, economic and environmental benefits, the JCS takes a holistic approach and Policy SD8 should be read in association with other policies, particularly those relating to design Policy SD4, landscape Policy SD6, and social and community infrastructure Policy INF3. District plans will provide supplementary policies as required, having regard to the variety, significance and condition of heritage assets in each local authority area.

- 4.9.12 Delivery of this policy will be through a range of mechanisms and funding streams. Local partnerships will have an important role to play, through regeneration and place-shaping initiatives, including local transport improvement schemes. Funding sources will include central funds such as the Heritage Lottery Fund, and developer contributions made through Section 106 or the Community Infrastructure Levy (CIL). The historic environment will also be conserved and enhanced through careful development management. Effective delivery will require close liaison with landscape, conservation and archaeology experts, and consultation with bodies such as Historic England and national amenity groups.
- 4.9.13 Development proposals must describe the significance of any heritage assets affected, including any contribution made by their setting. Proposals should also be supported by proportionate evidence demonstrating that the historic character and distinctiveness of the locality have been assessed and taken into account when preparing proposals. Where a development site includes, or has potential to include, heritage assets with archaeological interest, a desk-based assessment and, where necessary, a field evaluation must be submitted to the planning authority. Developers are required to record and advance understanding of any heritage assets to be lost (wholly or in part) through development and must provide this information to the relevant local authority for inclusion in the appropriate Historic Environment Record.

SD9 – BIODIVERSITY AND GEODIVERSITY

Background

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

Policy SD9: Biodiversity and Geodiversity

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

This policy contributes towards achieving Objective 4.

Explanation

4.10.4 The conservation and enhancement of biodiversity has been an international, national and local priority since the Rio Convention in 1992. National priorities were set out in the UK Biodiversity Action Plan (UKBAP), first published in 1994, and more recently replaced by the UK post-2010 Biodiversity Framework (2012). The government has also published Biodiversity 2020, a strategy for England's wildlife and ecosystem services (2011).

- 4.10.5 Gloucestershire contains a large number of protected sites which can be categorised as international, national and local sites. International sites include Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites (globally protected wetlands). Any development that has potential to have a likely significant effect on an international site (either alone or in combination with other plans or projects) will be subject to a Habitats Regulations Assessment. This includes a screening process followed by the completion of an Appropriate Assessment (if required) as set out in the European Union Habitats Directive 92/42 EEC. Development that would adversely affect the integrity of any SPA, SAC or Ramsar site will need to demonstrate exceptional requirements relating to the absence of alternative solutions and imperative reasons of overriding public interest.
- 4.10.6 National sites include Sites of Special Scientific Interest (SSSI). Local sites include Local Nature Reserves (LNR), Key Wildlife Sites (KWS) and Regionally Important Geological Sites (RIGS). These sites are subject to national and local policy protection.
- 4.11.7 The JCS provides an opportunity to deliver some of the objectives and complement the work programme of the Local Nature Partnership (LNP). The three local authorities are all partner organisations of the LNP, helping to deliver actions to address the needs of priority species and habitats as well as plans for other biodiversity and geodiversity assets of local importance or interest. The Gloucestershire Nature Map sets out spatial priorities for ecological conservation and enhancement across the county. A key part of this is the identification of a number of Strategic Nature Areas (SNAs), which are the key landscape-scale blocks of land where characteristic habitats that typify the county can be expanded and linked to support wildlife. Partnerships of local authorities, local communities, landowners and the private sector are also able to identify Nature Improvement Areas (NIA), such as the Cotswold Scarp NIA. These are the places which offer the best opportunities for habitat restoration on a significant scale with the greatest benefits for wildlife and are largely based on SNAs.
- 4.11.8 Geodiversity conservation concerns the protection, management and enhancement of geological formations. Advice is available through the Gloucestershire Geology Trust. It is likely that, during the lifetime of the JCS, a Geodiversity Action Plan will be developed for Gloucestershire that will provide more detailed advice on the conservation of geodiversity.

Delivery

- 4.11.9 Delivery will be achieved within the context of international and national legal frameworks, countywide initiatives and local strategies for biodiversity and geodiversity. Nature conservation will also be an important consideration within the Cotswolds AONB. District plans could support the JCS by identifying and mapping components of the local ecological network, including internationally, nationally and locally designated sites. District plans may also, as appropriate, include the boundaries of SNAs and NIAs which have been identified as priority areas for habitat creation and restoration. Where necessary, district plans will provide additional detail and guidance for decision makers. This may include information on the approach to securing developer contributions, and recommendations for habitat enhancements associated with new development, such as nesting boxes.
- 4.11.10 The development management process will contribute to delivery by protecting sites, habitats and species in accordance with national and local policies and other relevant legal requirements. The NPPF is clear that the presumption in favour of sustainable development

does not apply where development requiring Appropriate Assessment under the Birds or Habitats Directives is being considered, planned or determined.

- 4.11.11 Enhancements will be secured through the design of development and via planning conditions and obligations, including S106 agreements and CIL. To deliver these enhancements, developers and local authorities should work with appropriate partner organisations including the LNP and Gloucestershire Geology Trust.
- 4.11.12 The JCS requires developers to avoid harm to biodiversity or, where this is not possible, to incorporate mitigation measures into the design of developments. Developers should also ensure that development outside designated sites will not cause reasonably foreseeable harm to those sites, and if such an effect is likely, should mitigate against it. For situations where measures cannot be provided on-site, the local authorities may in certain circumstances consider a system of 'biodiversity offsetting'. In addressing the impacts of potential developments on geodiversity, it is intended that the councils will follow a similar approach to that proposed for biodiversity, based on avoidance, on-site mitigation and off-site compensation (for example, by improving the exposure of the geological feature).

SD10 – RESIDENTIAL DEVELOPMENT

Background

- 4.11.1 The JCS guides new housing development to sustainable and accessible locations as set out in Policy SP2. Policy SD10 provides further detail around the appropriate locations for residential development in the JCS area. Some of these locations will be sites that are allocated for residential development through district plans and neighbourhood plans, while other 'windfall' sites will come forward unexpectedly.
- 4.11.2 Throughout the plan period, local authorities are required to maintain a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements. If the authorities fail to do this then it may be difficult to prevent ad hoc development occurring on greenfield land. This policy therefore sets an approach to residential development to assist in delivering the scale and distribution of development set out in Policies SP1 and SP2. The policy approach directs residential development to previously-developed (brownfield) land. However, the previously-developed sites available in the JCS area are not sufficient to maintain a five-year supply so some greenfield sites will be allocated for development through the JCS, district and neighbourhood plans.

Policy SD10: Residential Development

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

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

Explanation

- 4.11.3 The agreed DCLG definition of a dwelling, based on that used by the census, is 'a self-contained unit of accommodation'. Self-containment is where all the rooms (including kitchen, bathroom and toilet) in a household's accommodation are behind a single door which only that household can use.
- 4.11.4 In accordance with Policy SP2, new housing will be delivered within the two main urban centres of Cheltenham and Gloucester and through urban extensions to those centres to meet needs where they arise. Development is directed to Tewkesbury town in accordance with its role as a market town and to rural service centres and service villages. This will include sites allocated in district or neighbourhood plans and additional windfall sites. Windfall development on previously-developed land within cities, towns, rural service

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

- 4.11.5 Outside cities, towns, rural service centres and service villages, there are generally insufficient facilities to support development and so they are not considered sustainable locations for residential development. Hence, new residential development is not considered appropriate unless specific exceptions are made within JCS, district or neighbourhood plan policies. For the purpose of this policy (4 ii), infill development means the development of an under-developed plot well related to existing built development. Additional special circumstances where housing development may be acceptable are listed in NPPF Paragraph 55.
- 4.11.6 Careful and innovative design is the key to achieving the highest appropriate density in a particular location. A proposal which would harm the character of a neighbourhood or site through excessive density, poor design or inadequate open space will not be acceptable. The aim is to secure a more sustainable pattern of development, utilising innovative design to achieve higher densities and to incorporate a mix of land uses where appropriate, whilst retaining the character and quality of the local environment. Detailed design requirements that support this policy are set out in Policy SD4. Policy SD2 also supports Policy SD10 by promoting residential development as part of the mix of uses including retail in designated centres.

Delivery

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

SD11 – HOUSING MIX AND STANDARDS

Background

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

Policy SD11: Housing Mix and Standards

1. Housing Mix

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

2. Standards

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

3. Specialist accommodation

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

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

Explanation

- 4.12.3 It is important to ensure that housing provision is responsive to local market changes and the needs of the local area, providing accommodation for people with different needs and at different stages in their lives. Local authorities are required by the NPPF to plan for a mix of housing and to identify the size, type, tenure and range of housing that is required. This information is contained in the local housing evidence base, which includes the JCS Assessment of Housing Requirements, the Gloucestershire SHMA 2014 and 2015 JCS update, and other data held by local authorities and their partners. Developers should refer to this evidence base to ensure that their proposals will contribute to mixed and balanced communities and a balanced housing market across the county of Gloucestershire.

- 4.12.4 In 2011, older people accounted for 13% of the population of the JCS area (NLP Assessment of Housing Needs 2012). This proportion could increase to 20% by 2031. To ensure that people can be housed in suitable accommodation whilst also stimulating the housing market by enabling older people to downsize, a proportion of new housing in the area should be suited to the needs of older people. This may include smaller and more accessible housing such as bungalows.
- 4.12.5 Throughout the plan period there will continue to be a need to provide family-sized housing in the JCS area. As the economy recovers, there is also an increasing need to provide accommodation suited to younger age groups and first-time buyers.
- 4.12.6 New housing should be designed in a way that enables households, including older people and those with disabilities, to live comfortably. This will include having adequate space to allow home working or study, space for visitors in housing for older people, and space to allow ease of movement in specialist accommodation. Within the JCS area this will be achieved by meeting or exceeding minimum space standards (see Delivery section below). New housing should also be built to high standards of sustainable design and construction in accordance with Policy SD3.
- 4.12.7 Properties should also be adaptable in order to meet people's changing needs and help to sustain independent living. In 2011, some 16.8% of the resident population in Gloucestershire had a long-term health problem or disability (SHMA 2014). Developers should therefore ensure that new housing is built to a high standard of accessibility and adaptability and that a proportion of housing are built in accordance with recognised standards. District plans may include further guidance and/or requirements on this issue.
- 4.12.8 Specialist accommodation will play a part in meeting identified needs including the needs of older people and people with disabilities. Specialist accommodation includes wheelchair-accessible housing, dementia-care housing, nursing homes, retirement villages, continuing-care retirement schemes and Extra Care housing.
- 4.12.9 This policy also considers the needs of Gypsy, Travellers and Travelling Showpeople as part of the wider housing mix and needs in the area. Policy SD13 specifically deals with the needs of these communities setting out a criteria-based policy for the consideration of future site allocations and planning applications. The supporting text further sets out the needs for the community arising from the Gypsy and Traveller Accommodation Assessment (GTAA, 2017) at Table C4. For those members of the community who do not meet the definition the provision of culturally appropriate accommodation will be considered as part of the general housing mix. These needs will be explored further through future work on the district plans.

Delivery

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

the JCS. Provision for the remaining need for C1 class bed spaces will be made through the emerging District Plans.

- 4.12.11 The updated 2015 SHMA provides an indication of the number and proportion of housing of different sizes and tenures that are likely to be required in the county over the plan period. Equivalent data for each local authority area is provided within the document appendices. Developers should refer to this information (or any subsequent publication) and engage with the relevant local authority in drawing up their proposals. For development at Strategic Allocations, it will usually be necessary to consider the needs of more than one local authority area.
- 4.12.12 The Government's Housing Standards Review was completed in 2015 which presents a single set of national space standards. These are optional standards that can only be applied where there is a local plan policy based on evidenced local need and where viability is not compromised. The district plans may in future include such a policy or potentially adopt locally-specific space standards.
- 4.12.13 As well as meeting minimum space standards, housing proposals will need to demonstrate how accessibility and adaptability have been considered as part of the design of the scheme. For development at Strategic Allocations, the standards and proportions to be delivered should be agreed with the local authority. Following the findings of the Government's Housing Standards Review, district plans may in future also adopt specific standards for accessibility and adaptability.
- 4.12.14 Developers of specialist or supported accommodation should draw on the local housing evidence base and engage with the relevant local authority to ensure that their proposals meet identifiable needs within the local community and that there is a local demand for the type of accommodation they are proposing. The design of specialist accommodation should draw on best practice including guidelines for wheelchair-accessible housing (or any equivalent national standard). Proposals should demonstrate how these have been incorporated into the design of the scheme and, where appropriate, how this supports longer-term commissioning of services. Developers should also provide evidence of how proposals dovetail with current Health and Social Care Commissioning and future plans.

SD12 – AFFORDABLE HOUSING

Background

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

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

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

Housing that does not meet the above definition of affordable housing, such as ‘low cost market housing’, is not defined as affordable housing for the purpose of this policy.

4.13.3 The Government, through the Housing & Planning Act 2016, has also set out a duty for Local Authorities to promote the supply of Starter Homes. The Starter Homes initiative is aimed at increasing opportunities for home ownership and therefore this particular tenure of housing is to be offered for at least 20% below their market value for people who have not previously been a home buyer and want to own and occupy their own home. The Housing and Planning Act 2016 includes Starter Homes within the definition of affordable housing, however, the mechanism for introducing the wider definition is to be subject to further legislation. Therefore, currently the definition provided within Annex 2 of the NPPF remains the most relevant.

Policy SD12: Affordable Housing

1. The JCS authorities will seek, through negotiation, for new development to deliver new affordable housing on a sliding scale approach as set out below:

- i. Within the Strategic Allocation sites a minimum of 35% affordable housing will be sought.**
- ii. Outside of the Strategic Allocation sites, on sites of 11 dwellings or more, or sites with a maximum combined gross floor space of greater than 1000 sqm; a minimum of 20% affordable housing will be sought on developments within the Gloucester City administrative area and a minimum of 40% will be sought within the Cheltenham Borough and Tewkesbury Borough administrative areas.**
- iii. On sites of 10 dwellings or less, which have a maximum combined floorspace of no more than 1,000 sq m, no contribution towards affordable housing will be sought.**
- iv. Notwithstanding the above, affordable housing policy for sites of 10 dwellings or less may be applied under policies set out within district plans.**

2. This policy applies to dwellings (as defined by use class C3) and also any self-contained units of accommodation within a residential institution (use class C2). Where a development site has been divided into parts, or is being delivered in phases, the site will be considered as a whole for the purpose of determining the appropriate affordable housing requirement

3. Where possible, affordable housing should be provided on-site and should be seamlessly integrated and distributed throughout the development scheme. On sites where it is not possible to deliver all affordable housing as on-site provision, the residual requirement should be provided through acceptable alternative mechanisms (such as off-site provision or financial contributions). Further guidance on acceptable mechanisms may be provided in district plans.

4. Affordable housing must also have regard to meeting the requirements of Policy SD11 concerning type, mix, size and tenure of residential development

5. The design of affordable housing should meet required standards and be equal to that of market housing in terms of appearance, build quality and materials

6. Provision should be made, where possible, to ensure that housing will remain at an affordable price for future eligible households, or that subsidy will be recycled for alternative affordable housing provision.

Rural exception sites

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

Viability

8. Where there is an issue relating to the viability of development that impacts on delivery of the full affordable housing requirement, developers should consider:

- i. Varying the housing mix and design of the scheme in order to reduce costs whilst having regard to the requirements of other policies in the plan, particularly Policy SD4, and the objective of creating a balanced housing market**
- ii. Securing public subsidy or other commuted sums to assist delivery of affordable housing**

9. If a development cannot deliver the full affordable housing requirement, a viability assessment, conforming to an agreed methodology, in accordance with Policy INF6 will be required. Viability assessments will be published in full prior to determination for all non-policy compliant schemes except in exceptional circumstances when it can be proven that publication of certain specific information would harm the commercial confidentiality of the developer to no public benefit. Where necessary the JCS authorities will arrange for them to be independently appraised at the expense of the applicant.

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

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

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

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

This policy contributes towards achieving Objectives 8 and 9.

Explanation

4.13.4 The need for affordable housing extends to specialist accommodation including housing for older people. Where these types of accommodation create self-contained units, they are expected to contribute to the provision of appropriate affordable housing to help meet the wider housing need of the district. Self-containment is where all the rooms (including

kitchen, bathroom and toilet) in a household's accommodation are behind a single door which only that household can use. There is sometimes confusion as to whether these units fall into use class defined as a residential institution (C2) or a dwelling house (C3). Our approach is that development which creates living spaces that retain the essential characteristics of a self-contained dwelling, even if some care is provided, will be subject to the affordable housing policy. Need for C3 'special' or 'extra care' accommodation has been addressed through the JCS OAHN. Through the examination, need for 1,558 C2 'residential institution' bed spaces were identified for the plan period across the JCS area. Many of these bed spaces will have already been consented between 2011 and the adoption of the JCS. Provision for the remaining need for C2 'residential institution' bed spaces will be made through the emerging District Plans.

4.13.5 The Gloucestershire SHMA 2014, updated in September 2015, provides evidence relating to affordable housing needs in the JCS area. It includes a Long-Term Balancing Housing Markets (LTBHM) model which informs this policy by providing an indication of the levels of affordable housing required from 2013-2031 to achieve a balanced housing market. Policy SD12 has also been informed by:

- Planning commitments at the base date of the LTBHM model (2013)
- The composition (by site size) of expected housing delivery over the plan period, based on Policy SP2. This includes assumptions about district capacity and windfall development that are informed by assessments of land availability and past trends in housing delivery.
- An assessment of the viability of the JCS affordable housing policy and of the JCS as a whole, taking account of the cumulative requirements of all policies and the potential for Section 106 and Community Infrastructure Levy contributions.

4.13.6 The policy reflects a strategic partnership approach to affordable housing delivery across the JCS area. This consistency of approach will help to ensure that full housing needs can be met in a way that supports urban regeneration and does not place onerous requirements on any individual local authority. The latest evidence from the 2015 SHMA, which emerged through the JCS examination, determined that there is a need for 638 affordable houses per year across the JCS area.

4.13.7 Viability is key factor in a sites ability to contribute towards affordable housing needs and an important consideration in setting the appropriate level of contributions from new development. The latest viability evidence presented by the 'Plan Viability, Community Infrastructure Levy and Affordable Housing Study' (February 2016) demonstrates that viability across the JCS area and between different development types can differ significantly. Sites across the JCS area will be able to contribute to affordable housing to a greater or lesser degree depending on the circumstances of each case. The viability and infrastructure challenges need to be taken into account when considering how to meet the overall need for affordable housing across the wider area.

4.13.8 Policy SD12 reflects the need to ensure that smaller residential developments remain viable while still contributing towards essential infrastructure needs. For this reason, affordable housing is not required on sites of 0-10 residential units. This is in accordance with national policy and guidance. The policy also reflects the viability of differing value areas that exist across the JCS and as such requires that sites of 11 or more dwellings provide a 40% contribution within Cheltenham and Tewkesbury, but only a 20% contribution within Gloucester.

- 4.13.9 The Strategic Allocations in the JCS present altogether different viability considerations from the rest of the area. The latest viability work evidences that, for Strategic Allocations, a 35% affordable housing contribution could be viable. However, it is recognised that each of these allocations will have their own individual deliverability and viability challenges. Therefore there will need to be balance between infrastructure provision and affordable housing in the context of deliverability. Some development proposals on the Strategic Allocations may be able to achieve greater than 35% affordable housing, while others may require a greater focus on infrastructure provision to deliver the site leading to a lower affordable housing contribution. Each proposal will be submitted with detailed viability evidence to determine the appropriate balance.
- 4.13.10 National Planning Practice Guidance states that affordable housing contributions should not be sought from developments of 10 units or less and this has been reflected in this policy. However, the guidance also sets out that, in designated rural areas (section 157(1) of the Housing Act 1985), local planning authorities may choose to apply a lower threshold of 5 units or less. If the 5 unit threshold is applied, payment of affordable housing and tariff style contributions on developments of 6 – 10 units should be sought as a cash payment only. There are areas within the JCS that would fall under this rural area designation, such as the Cotswold AONB, and therefore each authority may choose to apply a lower threshold where appropriate. Further detail and policies may be provided through the district-level plans.
- 4.13.11 In accordance with Policy SD11, a flexible approach is taken to the mix of housing tenures, types and sizes to be provided. This will allow local authorities and developers to refer to the most up-to-date evidence on housing need and to take account of the local context. For development at Strategic Allocations it will usually be necessary to consider the needs of more than one local authority area.
- 4.13.12 As part of the mix of affordable housing, developments should also consider the needs of specialist accommodation and how a site could contribute towards delivering them. This may include provision for affordable Gypsy, Traveller and Travelling Showpeople pitches and/or plots in line with any needs identified through the latest Gypsy and Traveller Accommodation Assessment and the SHMA. This would include the needs of these communities who are identified either within or outside the Government's definition set out through the Planning Policy for Traveller Sites.
- 4.13.13 To allow for delivery of rural affordable housing, it may be necessary to make an exception to the general locational requirements of Policy SP2 in accordance with Policy SD10. A strategic approach to rural exception sites is therefore provided as part of Policy SD12. When considering proposals for housing on rural exception sites, local authorities will consider whether allowing a limited proportion of market housing would facilitate the provision of new affordable housing. Further policy and guidance will be provided in district plans where required.

Delivery

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

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

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

SD13 – GYPSIES, TRAVELLERS & TRAVELLING SHOWPEOPLE

Background

- 4.14.1 'Planning Policy for Traveller Sites' (PPTS) was first published by the Government in March 2012 and aligned planning policy for traveller communities more closely with other forms of housing. It introduced, for example, the requirement for councils to demonstrate a five-year supply of pitches/plots against locally-assessed targets based on robust local evidence. A replacement to the original 2012 PPTS was first published on the 31 August 2015 by the Department of Communities and Local Government, which provides a new definition of Gypsies, Travellers and Travelling Showpeople for planning purposes. Under the new guidance only those people of nomadic habit of life, including those that have ceased to travel temporarily on grounds only of their own/ their family or dependants educational or health needs or old age, are defined as Travellers in planning terms. For the purposes of establishing the need for sites and yards in light of the change to the definition and to identify the resulting needs of both travelling households and non-travelling households, an up to date Gypsy and Traveller Accommodation Assessment (GTAA) was completed in March 2017, replacing the Gloucestershire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTTSA) 2013. This update provides a robust and credible evidence base to inform plan making.
- 4.14.2 The JCS area has long-established Gypsy, Traveller and Travelling Showpeople communities. There are many reasons for this, including excellent road connections, proximity of land close to the urban areas for access to services and employment opportunities, and strong family ties. Tewkesbury Borough is home to the majority of communities within the JCS area. Policy SD13 sets out criteria to guide site allocations in district plans and to help determine planning applications for Gypsy, Traveller and Travelling Showpeople communities. The supporting text further details the number of pitches and plots, identified through the GTAA (2017), that are required between 2016 and 2031. Policy SD11 further provides a hook to ensure the needs of those members of the community who do not meet the planning definition are addressed through district plans. Site allocations to provide for this need will be considered through the district plans.

Policy SD13: Gypsies, Travellers and Travelling Showpeople

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

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

Explanation

4.13.3 The Gloucestershire GTAA 2017 sets out the need for new pitches/plots resulting from existing traveller communities in Gloucestershire between a new base date of 2016 and the plan end date of 2031. The assessment shows that within the JCS area, there is a need for at least 83 pitches for Gypsies and Travellers, and 40 plots for Travelling Showpeople, regardless of their status under the planning definition. The breakdown of needs for the different communities, and by those who meet the definition, those who do not and those where their status is unknown, is set out in Table C4.

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

4.13.4 The Housing Act 1985 requires Local Authorities to assess and plan for the needs of all communities residing in their areas. With this in mind, the JCS provides hooks for the district plans to consider site allocations for all members of the traveller community through a combination of policies SD13 'Gypsies, Travellers and Travelling Showpeople' and SD11 'Housing Mix and Standards'. Furthermore, the affordable requirement for this community, identified as 'public' in the GTAA, along with other forms of affordable provision, will be addressed as part of the overall affordable housing requirement as set out in Policy SD12 'Affordable Housing'.

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

4.13.6 The nature of existing provision in Gloucestershire means that a very significant proportion of the needs arise in Tewkesbury Borough. However, PPTS sets out that where there are special or strict planning constraints across an area, local planning authorities should consider working together through the 'Duty to Co-operate' to provide for traveller needs, in order to provide more flexibility in the identification of sites, including the preparation of joint development plans. Further to this, the assessment confirms issues with the ability to bring forward sites for traveller communities in urban areas for reasons such as limited land availability and site viability. Depending on the availability of deliverable sites, it may also be necessary to work with other Gloucestershire authorities to address needs arising from their communities.

Delivery

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

SD14 – HEALTH AND ENVIRONMENTAL QUALITY

Background

- 4.15.1 The JCS contains a framework of policies to support the health and well-being of local communities through provision of appropriate housing, employment opportunities, access to services, walking and cycling routes, green infrastructure, wildlife habitats, and a high-quality built and historic environment that is clean, safe and accessible. Policies are also in place to address the possible impacts of development including transport impacts, climate change and flooding.
- 4.15.2 Within the JCS area, a need for new housing and employment development coincides both with areas of existing high environmental quality and areas that are in need of physical regeneration. Policy SD14 aims to ensure that development does not have any unacceptable impacts on human health or environmental quality, and that where possible it secures benefits.

Policy SD14: Health and Environmental Quality

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

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

Explanation

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

Delivery

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

PART 5 – INFRASTRUCTURE POLICIES

Introduction

- 5.1.1 Successful and sustainable communities depend upon physical, green and social and community infrastructure to meet the needs of residents and businesses. Infrastructure encompasses a very wide range of provision including transport, public utilities and waste management, flood management measures, social and community infrastructure such as affordable housing, health care facilities and sports provision, green infrastructure, culture, faith and spiritual facilities, education, leisure and tourism, and other community facilities ranging from community meeting halls to children’s play areas.
- 5.1.2 It is important to appreciate that whilst there is a considerable degree of funding from governmental and other public sources, a significant amount of the money for provision of new or enhancement of existing infrastructure comes in the form of financial contributions from developers or in the form of payment in kind through direct provision of facilities or services. Clearly, there is only so much that a developer can be expected to contribute to infrastructure provision without threatening the economic viability of the proposal. This may be particularly so in respect of the redevelopment of brownfield land. In encouraging, where feasible, the redevelopment of brownfield land, the local planning authorities will on a case-by-case basis take into account evidence of any mitigating circumstances that affect the viability of redevelopment. Equally, a planning authority cannot reasonably be expected to allow development that will have an unacceptable impact on existing infrastructure.
- 5.1.3 Where viability appears finely balanced, hard choices may sometimes need to be made in prioritising what is to be provided and/or when it is to come forward during the life of the development. For this reason, it is crucial to consider infrastructure provision ‘in the round’ and not to look at items in isolation from each other. This approach is endorsed by Government at Page 3 of the National Infrastructure Plan 2013: *‘The government recognises that meeting the UK’s infrastructure ambitions requires a long-term sustainable plan, which means taking a cross-cutting and strategic approach to infrastructure planning, funding, financing and delivery’*.
- 5.1.4 Recognition of the need to provide sufficient infrastructure to enable and support sustainable development and economic growth is inherent within the NPPF. Whilst infrastructure is referenced frequently throughout the NPPF, several core planning principles and key sections relate specifically to it (such as Parts 4, 5, 8 and 10).
- 5.1.5 In acknowledging the central importance of infrastructure to the delivery of the plan’s policies and proposals, the JCS is supported by an Infrastructure Delivery Plan (IDP). Its function is to assess the infrastructure and services that will be required to support the levels of housing and employment growth proposed in the plan. In doing so, the IDP fulfils several roles:
- It provides evidence supporting the preparation and delivery of the JCS
 - It presents estimated infrastructure costs and secured sources of infrastructure funding, including the potential for developer contributions towards infrastructure through S106 planning obligations. In due course, it will also be the evidence base underpinning any Community Infrastructure Levy (CIL) charging schedule for each of the three constituent local planning authorities.

- It identifies whether any Nationally Significant Infrastructure Projects (NSIPs) are expected to come forward within the JCS area. Currently there are no NSIPs in the JCS area registered with the Planning Inspectorate.

5.1.6 In addition to enabling development to come forward, securing delivery of infrastructure will contribute to the achievement of JCS objectives. These include limiting flood risk, reducing dependency on the car, and enhancing access to community services within local centres.

INF1 –TRANSPORT NETWORK

Background

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

Policy INF1: Transport Network

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

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

Explanation

- 5.2.6 All development influences travel patterns either through new trips on the network or the re-routing of existing trips. This may occur on a micro-level by providing a single access point onto the highway network, or the macro-level where a range of infrastructure improvements are required to provide a range of travel choices for a strategic allocation.
- 5.2.7 The desired outcome from all development remains a safe and efficient transport network where people feel safe and they have a reasonable variety of travel choices. The degree of choice must be realistic in relation to the proposed development in terms of use, affordability and ongoing maintenance. Policy SD4 sets out the approach to sustainable travel modes and choice in new development in regards to masterplanning, design and layout.
- 5.2.8 The need to mitigate the impact of car-based travel in respect of road congestion, health and atmospheric pollution is a key objective of the NPPF. It underpins the requirement in the NPPF for development that generates significant amounts of movement to be supported by Transport Statements or Transport Assessments. Proposals should fully consider measures, where feasible, to encourage individuals to walk or cycle for appropriate short distance trips (less than three miles) or use passenger transport for longer distance journeys. The impact

on passenger transport services needs to be considered to ensure site sufficient capacity exists on services and/or car-parking facilities at rail stations.

- 5.2.9 The local planning authority may require a site-wide travel plan to be submitted with proposals to address sustainable transport strategy for a development. Travel plans are a useful tool when considering how best to mitigate the impact of car-based transport and to promote a shift towards more sustainable modes. Travel plans will be expected to conform to the guidance set out in the NPPF and the PPG. They should form long-term management strategies to put in place measures to actively manage the transport impacts of development and promote and encourage sustainable travel. This should take into account all journeys likely to result from a development. Travel plans will be expected to identify specific outcomes, targets and measures and set out clear future monitoring and management arrangements.
- 5.2.10 Where known air or noise quality issues exist and a significant increase in car-based travel is expected from a development, all relevant environmental assessments must be completed as part of the planning application process. Particular issues exist at congested junctions within urban areas and on routes with a high volume of slow-moving traffic. Gloucester, Cheltenham and Tewkesbury have declared five Air Quality Management Areas (AQMAs) under Section 83 of the Environment Act 1995 where Nitrogen Dioxide (NO₂) exceedances occur due to traffic-related emissions.

Delivery

- 5.2.11 The policies will be implemented through the development management process.
- 5.2.12 The County Council has provided a number of useful documents which provide advice for developers. These are all available through Gloucestershire County Council's website (www.gloucestershire.gov.uk) and are periodically updated and amended to ensure they remain fit for purpose.
- **The Transport Implementation Strategy (TIS)** - This strategy sits alongside the JCS providing important explanation and guidance on implementation for decision makers interpreting policies in the JCS, particularly INF1 and transport elements of policies SD4 (design) and SA1 (strategic allocations).
 - **Local Transport Plan 2015-2031** – provides an overview of the strategic context of the transport network within the county, setting out strategy, policies and investment priorities. The LTP is a living document which will be updated and amended to reflect changing policy at the national and local level. This would enable the LTP to be responsive to any significant transport infrastructure needs that may arise through the JCS plan period, including future reviews.
 - **Local Developer Guide 2013** – provides a brief overview for developers on the type of infrastructure considerations that should be taken into account when making a planning application
 - **Manual for Gloucestershire Streets** and its appendices – provides guidance to developers, their consultants and design engineers, local planning authorities, Parish and Town Councils and the public, on how new development within Gloucestershire can contribute towards the provision of a safe and sustainable transport network within the County.

INF2 – FLOOD RISK MANAGEMENT

Background

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

Policy INF2: Flood Risk Management

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

This policy contributes towards achieving Objective 6.

Explanation

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

5.3.5 The Environment Agency regularly updates the 'Flood Map for Planning' showing areas at high (1 in 100 year), medium (1 in 1,000 year) and low (less than 1 in 1,000 year) risk of

flooding (these are Flood Zones 3, 2 and 1 respectively). To complement these maps, Gloucestershire County Council, the Lead Local Flood Authority (LLFA), prepared a SFRA Level 1 for the county (September 2008). This assessed all forms of flood risk: fluvial (rivers), tidal (sea), surface water, groundwater, sewers and impounded water bodies (reservoirs and canals), in the context of the situation at the time and taking into account the likely impacts of climate change in the future. Gloucestershire County Council also produces Surface Water Management Plans which seek to identify areas more vulnerable to surface water flooding and indicate measures to mitigate this, recognising that it is not economically viable to eliminate flooding altogether.

- 5.3.6 To provide more site-specific information, SFRA Level 2 reports were commissioned by the JCS authorities. These involved a more detailed review of flood hazard (flood probability, flood depth, flood velocity, rate of onset of flooding), taking into account the presence of flood risk management measures such as flood defences. In doing this, the JCS authorities have applied the definitions used in the Flood and Water Management Act 2010.
- 5.3.7 To ensure that flood information is up to date when taking planning decisions about flood risk, planning allocations will be required to ensure that the modelling and flood flows used to justify the flood zones set out in any application take account of updates and changes to the models used. Particular regard should be had to changes and updates to models relating to rainfall predictions and climate change data.
- 5.3.8 As an overarching principle, all new development should seek to provide an overall reduction in flood risk. The risk of flooding can be reduced by:
- Using a sequential approach to determining the suitability of land for development
 - Ensuring that all flood risk management infrastructure is maintained over a development's lifetime
 - Seeking to ensure that watercourses are left in open space and are well integrated into existing Green Infrastructure wherever possible
 - Careful site design, including reconfiguring ground levels or site access points, culvert improvements, channel restoration, the use of planting, and existing woods and trees to manage flood risk and incorporating SuDS. Suitable SuDS solutions will vary according to location, for example 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
 - Where a Surface Water Management Plan shows the presence of pluvial flooding, the development will need to compensate for the pluvial flood volume lost by providing additional flow and storage capacity within the developments surface water drainage system and attenuation storage.
 - Ensuring that all flood management designs which form part of planning applications are fully implementable and free from legal or design impediments which are likely to affect their usefulness
 - Considering and acting on the cumulative impact of existing and new development, for example:
 - Ensuring that works to raise the highway levels where the highway is subject to fluvial flooding will only be permitted if provision is made at the same time to provide additional flood flow capacity under the highway to ensure no adverse impacts upstream.

This list is not exhaustive.

- 5.3.9 The cumulative impact of development of strategic scale will need to be considered as part of the site-specific development management process. This cumulative assessment is most appropriate at the sub-catchment scale, where development areas have the potential to influence downstream flows that could impact existing settlements, or permitted or allocated developments. The vulnerability of development from other sources of flooding will be considered as well as the effect of the new development on surface water run-off.
- 5.3.10 Construction that is resilient (rather than resistant) is favoured because it can be achieved more consistently and is less likely to encourage occupiers to remain in buildings that could be inundated by rapidly-rising water levels. Flood resistance and resilience measures should not be used to justify development in inappropriate locations, and in isolation are unlikely to make all types of development safe.
- 5.3.11 The JCS authorities will, in principle, support measures proposed by the Environment Agency and others to reduce flood risk, including increasing the quality/quantity of the floodplain, defending areas at risk of flooding, and restoring culverted watercourses back to open channels. This will help to reduce flood risk to counteract the increased threat of flooding through climate change, and provide environmental benefits.

Delivery

- 5.3.12 The NPPF sets out the requirement to adopt a sequential, risk- based approach to the location of development at risk of flood.
- 5.3.13 National Planning Policy Guidance (PPG) requires that, where necessary, the Exception Test should now be applied in the circumstances set out in the Flood Risk and Coastal Change section of that document.
- 5.3.14 In addition to the formal Sequential Test, the NPPF sets out the requirement for developers to apply the sequential approach to locating development within the site.
- 5.3.15 Developers should carefully follow guidance from the Environment Agency and Gloucestershire County Council, as well as that contained in the Development Plan, on the correct way to demonstrate that the exception and sequential tests have been properly applied.
- 5.3.16 Large-scale development should contribute to meeting with the objectives of the EU Water Framework Directive in line with the Severn River Basin Management Plan.
- 5.3.17 Developers should follow guidance from the LLFA when considering SuDS schemes. This can be found in its November 2015 publication 'Gloucestershire SuDS design and maintenance guide'

INF3 – GREEN INFRASTRUCTURE

Background

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

Policy INF3: Green Infrastructure

1. *The green infrastructure network of local and strategic importance will be conserved and enhanced, in order to deliver a series of multifunctional, linked green corridors across the JCS area by:

 - i. *improving the quantity and/or quality of assets*
 - ii. *improving linkages between assets in a manner appropriate to the scale of development, and*
 - iii. *designing improvements in a way that supports the cohesive management of green infrastructure.**

2. *Development proposals should consider and contribute positively towards green infrastructure, including the wider landscape context and strategic corridors between major assets and populations. Where new residential development will create, or add to, a need for publicly accessible green space or outdoor space for sports and recreation, this will be fully met in accordance with Policy INF4. Development at Strategic Allocations will be required to deliver connectivity through the site, linking urban areas with the wider rural hinterland.*

3. *Existing green infrastructure will be protected in a manner that reflects its contribution to ecosystem services (including biodiversity, landscape/townscape quality, the historic environment, public access, recreation and play) and the connectivity of the green infrastructure network. Development proposals that will have an impact on woodlands, hedges and trees will need to include a justification for why this impact cannot be avoided and should incorporate measures acceptable to the local planning authority to mitigate the loss. Mitigation should be provided on-site or, where this is not possible, in the immediate environs of the site.*

4. *Where assets are created, retained or replaced within a scheme, they should be properly integrated into the design and contribute to local character and distinctiveness. Proposals should also make provisions for future maintenance of green infrastructure.*

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

Explanation

- 5.4.5 According to Natural England, green infrastructure needs to be planned and delivered at all spatial scales from national to neighbourhood levels. The greatest benefits will be gained when this network is designed and managed as a multi-functional resource, capable of delivering a wide range of environmental and quality of life benefits (ecosystem services) for local communities. These include social and health benefits associated with recreational space, walking and cycling networks and opportunities for social interaction; environmental benefits such as enhanced biodiversity and flood mitigation; and economic benefits associated with an environment that is attractive to residents, visitors and investors. Design and management of the green infrastructure network should also respect and enhance the character and distinctiveness of an area with regard to habitats and landscape types.

- 5.4.6 The JCS authorities have produced a Green Infrastructure Strategy based on an assessment of the area's environmental assets. The strategy identifies two key regional/sub-regional green infrastructure assets in the area: The Cotswolds AONB to the east and the River

Severn and its washlands to the west. The River Severn area has been promoted by the JCS authorities as a potential Regional Park. This would recognise the special habitat qualities of the area as well as its importance for the quiet enjoyment of the countryside. Below this, at an intermediate level, the strategy seeks to link these two assets and the main urban areas through a number of green corridors, most of which are watercourses. At a local level, the strategy identifies watercourse corridors as key green infrastructure assets in the urban areas. Ideally, all green infrastructure should link with these areas and form a co-ordinated network. The Green Infrastructure Strategy therefore includes a vision that everyone living in the JCS area can, within 300 metres (five minutes' walk-time), access a green infrastructure corridor or asset. From there, people will be able to travel through interconnected and multi-functional green spaces to ultimately emerge into the strategic assets of The Cotswolds AONB or the Severn and its washlands.

- 5.4.7 Enhancement of green infrastructure and ecological networks will require existing assets to be retained (where appropriate), improved and better managed, and new features to be created. It is recognised that the growth to be delivered through the JCS may increase demands on green spaces through increased recreational use. This will require careful management, particularly for ecologically sensitive sites. This could include requiring developer contributions for such provision (for example, a contribution towards the management of the Cotswolds Beechwoods Special Area of Conservation [SAC]). The JCS authorities will work together with key stakeholders, such as Natural England and the Environment Agency, to develop management and mitigation packages for important green and ecological networks and to discuss how future development can contribute to this. Policy on developer contributions is set out in Policy INF6. New green infrastructure should combine with established green spaces to thread through and surround the built environment, connecting urban areas and villages with the natural and agricultural areas beyond. This will require delivery of both large- and small-scale interventions at local, intermediate and strategic/landscape level. Development at Strategic Allocations will need to deliver connectivity through the site, linking urban areas with the wider rural hinterland.
- 5.4.8 As green infrastructure networks are enhanced by new development, it is important that other incidental green infrastructure assets are not lost or allowed to deteriorate. These include private gardens, cemeteries and allotments which will not all be identified on proposals maps but are nevertheless an essential element of the wider green infrastructure network.

Delivery

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

- 5.4.11 Moving towards achieving the vision of the Green Infrastructure Strategy will require each development proposal to consider how it can contribute to improving connectivity in the network. Key linkages between areas of green infrastructure will be targeted through the JCS-wide Strategic Green Infrastructure Map and the urban area green infrastructure maps contained in the Green Infrastructure Strategy. Proposals that improve the accessibility of the green infrastructure network for sports, play and travel, for example by creating, improving or extending footpaths, bridleways and cycling links, will therefore be encouraged. Accessibility improvements should take account of the need to protect the ecological function of these corridors in accordance with Policy SD9.
- 5.4.12 Where specific policies are required to designate and protect local green infrastructure assets (such as public parks, sports pitches, allotments or local green space), these will be included in district plans and illustrated on associated Policies Maps. Other detailed policies relating to green infrastructure provision and protection, such as tree-planting requirements and Tree Preservation Orders, will also be contained in district plans where necessary. Ancient woodland and veteran trees will be protected in accordance with the NPPF.
- 5.4.13 The indicative site layout for the strategic allocation at North West Cheltenham indicates where a green buffer should be retained near Swindon Village when master planning this area in accordance with Policy SA1. The Cheltenham Plan will allocate the specific boundaries of Local Green Space in this area, along with any other Local Green Space to be allocated in the Borough.
- 5.4.14 Mechanisms and funding streams associated with other countywide and local strategies will help to secure improvements to green infrastructure. These include strategies for parks and open spaces, biodiversity/nature conservation and local transport. Landscape-scale projects that support the delivery of Policy SD9 will particularly be encouraged. Proposals that enable the expansion, buffering and re-connection of native and ancient woodland will also be encouraged.
- 5.4.15 District Plans may include policy or guidance on making provision for play space or improvements to recreational provision associated with growing populations.

INF4 – SOCIAL AND COMMUNITY INFRASTRUCTURE

Background

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

Policy INF4: Social and Community Infrastructure

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

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

Explanation

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

- 5.5.3 It is important that new development, which will add to the combined needs of the community, contributes to new or expanded facilities to ensure that these additional needs are met. For provision to be sufficient and timely, it must be brought forward in parallel with new housing and other development so that facilities are available for use when needed. Where new development occurs in areas of inequality or undersupply, there may be opportunities to re-connect the area and provide wider benefits. Developers should therefore take opportunities where they exist to integrate new provision with existing facilities (for example, by extending a facility) or to provide it in a location that is accessible to residents of neighbouring areas with identified needs.
- 5.5.4 The right location for a community facility will depend on its scale and function. Facilities that serve the day-to-day needs of a community should be located in local centres close to the communities that they serve and should be fully accessible and inclusive. The location of higher-level facilities, such as leisure centres, should be highly accessible to all members of the community and, where possible, should be directed to an allocated site or an appropriate site in an area of undersupply. All facilities should be accessible by walking, cycling and public transport. Mixed-use development can help to ensure that housing and businesses are close to services and that neighbourhoods are safe, lively and well-maintained. Facilities that are flexible and perform a range of functions can also help to generate higher levels of activity whilst making more efficient use of land.
- 5.5.5 As stated in the introduction, social and community infrastructure is vitally important in ensuring the quality of life and well-being of communities. For this reason, the redevelopment of a community facility will only be acceptable in certain circumstances; for example, where the facility will be replaced, or where it can satisfactorily be demonstrated that there is no current or future need or demand, or where a marginal loss will result in improvement or provision of a complementary use. Proposals to build on existing sports and recreational buildings or land should be considered in accordance with the criteria in the NPPF.

Delivery

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

INF5 – RENEWABLE ENERGY AND LOW CARBON ENERGY DEVELOPMENT

Background

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

Policy INF5: Renewable Energy/Low Carbon Energy Development

1. *Proposals for the generation of energy from renewable resources, or low carbon energy development (with the exception of wind turbines), will be supported, provided the wider environmental, social or economic benefits of the installation would not be outweighed by a significant adverse impact on the local environment, taking into account the following factors:*
 - i. *The impact (or cumulative impact) of the scheme, including any associated transmission lines, buildings and access roads, on landscape character, local amenity, heritage assets or biodiversity*
 - ii. *Any effect on a protected area such as The Cotswolds AONB or other designated areas such as the Green Belt*
 - iii. *Any unacceptable adverse impacts on users and residents of the local area, including emissions, noise, odour and visual amenity.*

2. *Proposals are more likely to be supported when they demonstrate:*
 - i. *That they have been designed and sited so as to minimise any adverse impacts on the surrounding area*
 - ii. *Benefits arising directly from the scheme to the local economy, the community and achievement of national targets*
 - iii. *The feasibility and cost-effectiveness of removing any installation and re-instatement of the site in future years*
 - iv. *The net gain of carbon savings, taking into account carbon use through manufacturing and installation of the technology.*

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

Explanation

- 5.6.6 The Government has adopted ambitious targets for renewable energy generation. Nationally the expectation is that we will generate 15% of our total energy demand through renewable sources by 2020. This is total energy that includes heat and transport. To achieve this, a step change in the take-up of renewables will be needed, and the planning system has a key role to play in this. There are more ambitious targets for 2030 and beyond.
- 5.6.7 The NPPF makes clear that planning plays a key role in reducing greenhouse emissions and supporting the delivery of renewable and low carbon-associated infrastructure. Amongst other things, local planning authorities should have a positive strategy to promote renewable and low carbon energy, have policies that maximise renewables and low carbon development while ensuring their adverse impacts are satisfactorily addressed, and give support to community-led initiatives.
- 5.6.8 The NPPF suggests that local planning authorities consider identifying suitable areas for renewable energy. Gloucestershire County Council commissioned ENTEC to undertake a study into renewable energy capacity across the county in 2010. It considered renewable/low carbon development at a commercial level and identified wind and biomass as potential resources for the JCS area. Furthermore, it identified that there were no significant grid constraints within the JCS area, and that electric and gas grid availability was generally good. The ENTEC study does not provide sufficiently strong evidence on its own to enable the JCS authorities to identify suitable areas for developing renewable energy;

however, district plans may seek to identify these based on more detailed local evidence, or may seek to provide further guidance on the issue.

Delivery

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

INF6 – INFRASTRUCTURE DELIVERY

Background

- 5.7.1 Government says that 'Infrastructure is the foundation upon which our economy is built. The government remains determined to deliver better infrastructure in the UK to grow the economy and improve opportunities for people across the country.' (National Infrastructure Delivery Plan 2016–2021 Executive Summary). This standpoint is mirrored in the NPPF. There is little further to add in emphasising the importance of infrastructure in all its forms to the community as a whole.

Policy INF6: Infrastructure Delivery

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

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

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

This policy contributes towards achieving all the JCS Strategic Objectives.

Explanation

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

objectives are upheld. Operating within a plan-led system, developers are therefore required to encompass implementation of the IDP within their proposals.

- 5.7.3 The JCS proposes, in Policies SP1 and SP2, a significant level of growth to 2031 and beyond. Strategic Allocations are proposed for several major development sites that are likely to generate the need for new infrastructure and services to be provided on site and in an integrated manner. In addition, the JCS also recognises the potential impact of smaller-scale proposals that cumulatively will have an impact upon the existing provision and pattern of infrastructure within the area. For this reason, the policy incorporates the potential requirement for 'off-site' infrastructure as well as dedicated, on-site provision within a development.
- 5.7.4 It follows, from the preceding paragraphs and from the background to this policy, that the provision of infrastructure is a matter of critical importance in the consideration and determination of applications for planning permission. Existing infrastructure may have sufficient capacity to absorb some if not all the envisaged impact of new development. However, in many instances this may not be the case. Furthermore, where additional provision is needed, the JCS authorities acknowledge that it may not be practical and/or economically viable to require a developer to make provision for all required infrastructure identified with their proposal at the outset. Consequently a phased approach to provision and maintenance, that is fully justified within the planning application, may be acceptable. Nevertheless, if sufficient provision cannot be adequately demonstrated both in terms of infrastructure items and necessary maintenance, planning permission is likely to be refused. For the avoidance of doubt, references to 'new development' include development of all scales and types.

Delivery

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

INF7 – DEVELOPER CONTRIBUTIONS

Background

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

Policy INF7: Developer Contributions

- 1. Arrangements for direct implementation or financial contributions towards the provision of infrastructure and services required as a consequence of development, including its wider cumulative impact, and provision where appropriate for its maintenance, will be negotiated with developers before the grant of planning permission. Financial contributions will be sought through the S106 and CIL mechanisms as appropriate.***
- 2. Where, having regard to the on- and/or off-site provision of infrastructure, there is concern relating to the viability of the development, an independent viability assessment, funded by the developer and in proportion with the scale, nature and/or context of the proposal, will be required to accompany planning applications. Viability assessments will be undertaken in accordance with an agreed methodology and published in full prior to determination for all non-policy compliant schemes. Where necessary the JCS authorities will arrange for them to be independently appraised at the expense of the applicant***

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

Explanation

- 5.8.4 To secure the best use of land, the JCS authorities need to ensure, through the use of conditions and planning obligations attached to planning permissions, that new development provides for the infrastructure, facilities, amenities and other planning benefits which are necessary to support and serve it, and to offset any consequential or potential loss to the local area which may result from the development.
- 5.8.5 The JCS authorities recognise that economic viability of development can be finely balanced, particularly where significant infrastructure requirements are identified as being needed to

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

- 5.8.6 Publication of viability assessments will be required for non-compliant schemes in line with best practice and for reasons of transparency. Publication of such assessments will allow communities to assess the robustness of the appraisal and empower decision makers. Publication of viability assessments will be required in full for non-compliant schemes except in exceptional circumstances when it can be proven that publication of certain specific information would harm the commercial confidentiality of the developer to no public benefit.

Delivery

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

PART 6 – Strategic Allocations

POLICY SA1 – STRATEGIC ALLOCATIONS POLICY

Background

- 6.1.1 Strategic Policies SP1 and SP2 in Part 3 of this plan set out the scale and distribution of development to be delivered across the JCS area in the period to 2031. The identification and delivery of seven Strategic Allocations on the edges of existing urban areas is an important part of the delivery of the JCS as a whole.
- 6.1.2 Policy SA1 formally designates these seven Strategic Allocations and focuses on the need to deliver comprehensive development in each of these areas. Comprehensive development is critical in ensuring that large-scale proposals use land efficiently, maximise the efficient and effective delivery of infrastructure over the life of the development, and ensure the protection and enhancement of natural resources.
- 6.1.3 The Strategic Allocations Report details the process by which the approximate capacity of the sites in Table SA1 was calculated, except for allocations at Twigworth, Winnycroft and West Cheltenham. The capacity of these sites has been informed through the JCS evidence base as it progressed after submission. The approach took into account extensive work carried out over a number of years on the developable areas within these allocation boundaries. Once these areas were identified, the yield of housing predicted to arise from the site was reduced to take into account infrastructure and green space requirements. These reductions in yield are in addition to reductions made to allow for areas already identified solely for green infrastructure within the allocation boundaries. Where available, 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.

Policy SA1: Strategic Allocations Policy

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

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

Table SA1

	Indicative Housing Total	Site	Indicative Housing to be delivered up to 2031	Hectares of Employment Land to be delivered up to 2031
A1 Innsworth & Twigworth	2,295		2,295	9.1
A2 South Churchdown	1100		1100	17.4
A3 North Brockworth	1500		1500	3

A4 North West Cheltenham	4285	4285	23.4
A5 Ashchurch	N/A	N/A	14.3
A6 Winneycroft	620	620	N/A
A7 West Cheltenham	1100	1100	45
Total	10,900	10,900	112.2

Explanation

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

Delivery

- 6.1.5 Development proposals concerning Strategic Allocations must be in accordance with the provisions of the Development Plan as a whole, including:
- Retained policies from the 2006 Cheltenham and Tewkesbury Local Plans and associated Supplementary Planning Documents and Guidance
 - Adopted or emerging Gloucester, Cheltenham or Tewkesbury district plans
 - Adopted or emerging Minerals or Waste Plans of Gloucestershire County Council, and
 - Emerging or adopted neighbourhood plans.
- 6.1.6 Delivery of the elements of this policy will come through effective development management practices and may be the subject of more detailed requirements in forthcoming district or neighbourhood plans in conformity with the JCS.

Strategic Allocations Policies & Maps

- 6.1.7 The red lines on each of the Strategic Allocations plans show the policy allocation area, and are drawn to follow identifiable boundaries such as roads and watercourses wherever available. Areas of land and buildings which may not be suitable or available for development or redevelopment are included within these boundaries. However, site allocations work has indicated that a development of the scale set out in Table SA1 will be achievable within these locations.
- 6.1.8 Proposals should also take into account the indicative site layouts presented for each allocation as part of this document, integrating key elements into site masterplanning where practical.
- 6.1.9 Full regard must be given to the requirements of the NPPF and the development plans of each of the three councils when assessing development options for these locations. Furthermore, in order to ensure the sustainable development of the allocations, a site specific policy has been prepared which sets out the key principles and infrastructure requirements.

Policy A1 - Innsworth & Twigworth

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

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

Plan A1 – Innsworth & Twigworth

6.1.10 This Strategic Allocation lies to the north of Gloucester and is bounded by Innsworth Lane and Innsworth Technology Park to the south, open countryside to the west, Down Hatherley Lane to the north, and Frogfurlong Lane and Imjin Barracks to the east. The residential settlement of Innsworth lies to the south of the site and Twigworth and Down Hatherley to the north. The Hatherley Brook and its associated floodplain run through the centre of the site which also includes a Site of Special Scientific Interest.

Policy A2 - South Churchdown

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

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

Plan A2 – South Churchdown

6.1.11 This Strategic Allocation lies to the south of Churchdown and Innsworth and is bounded to the west by the A40 and the A417, to the north by Innsworth, to the north east by Churchdown, and to the south by the mainline Gloucester-to-Cheltenham railway. The site is bisected by the A40 Golden Valley dual carriageway. Part of the site is currently the subject of a planning application to the County Council for a Park and Ride facility at Elmbridge. Existing offices and a new emergency fire and ambulance response station are located adjacent to the Elmbridge Court roundabout at the west of the site. The heritage asset of Pirton Court lies to the north east of the site at Pirton Lane, and an historic orchard is located to the west of the site.

Policy A3 - North Brockworth

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

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

Plan A3 – North Brockworth

- 6.1.12 This Strategic Allocation lies to the north of Brockworth and is bounded to the south by Mill Lane and the existing built form of Brockworth and Hucclecote, to the west by the M5, to the north by the A417 dual carriageway, and to the east by the A46 Shurdington Road. The site includes the designated heritage assets of Church of St George and Brockworth Court, and Roman and medieval archaeology is prevalent across the site. Two historic orchards are located within the site.

Policy A4 - North West Cheltenham

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

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

Plan A4 – North West Cheltenham

- 6.1.13 This Strategic Allocation is located adjacent to the north-western edge of Cheltenham, north of the A4019 Tewkesbury Road and west of the Gallagher Retail Park, Kingsditch Industrial Estate and Swindon Village. The land is predominantly in mixed agricultural use. There are a number of watercourses within the site boundary, including the Swilgate, Hyde Brook and Leigh Brook. Two watercourses that converge towards Elmstone Hardwicke have associated land within the functional floodplain.

Policy A5 - Ashchurch

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

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

Plan A5 – Ashchurch

6.1.14 This Strategic Allocation lies to the south and east of Junction 9 of the M5, immediately south of the A46. It is bounded to the east by the main railway line. The Tirl Brook forms the southern boundary of the Strategic Allocation area. The current land use is predominantly agricultural, whereas the adjacent area to the north of the site is characterised by existing employment uses.

Policy A6 - Winneycroft

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

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

Plan A6 - Winneycroft

6.1.15 Winneycroft is an area located to the south east of Gloucester city where the existing urban fringe of Gloucester meets the semi-rural area. The area is bounded by Winneycroft Lane to the west, Corncroft Lane to the north and the M5 motorway to the east and south. The existing land use is agricultural land.

6.1.16 Addition of red line plan A6 - see “Joint Core Strategy Main Modifications Consultation February 2017 Modified and New Maps” document.

Policy A7 – West Cheltenham

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

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

Plan A7 – West Cheltenham

6.1.17 Land to the west of Cheltenham is relatively flat land drained by the River Chelt. The West Cheltenham Strategic Allocation is adjacent to the urban edge of Cheltenham and has an urban fringe character. The area is bounded by Old Gloucester Road to the north, Hayden Lane to the east and Pheasant lane to the South. To the east of the allocation is land safeguarded for the further growth of Cheltenham well beyond the plan period, which includes the Hayden Sewage Treatment works. The land within the allocation is predominately in agricultural use.

PART 7 – Delivery, Monitoring & Review

Delivery (including Housing Implementation Strategy)

- 7.1.1 Whilst the JCS can allocate sites and local authorities can discuss with landowners and developers how best to bring their sites forward in the allocated locations, there is always a risk that sites may not come forward as planned during the anticipated timescale. Therefore the NPPF states the need for a Housing Implementation Strategy (HIS) which explains what the JCS authorities will do should there be any barriers to delivering development as proposed by Policies SP1 and SP2, and also how to respond to changing circumstances. The HIS which takes forward the Housing Background Paper (EBLO 101) sets out the trajectory and delivery for both market and affordable housing.
- 7.1.2 The JCS sets out key principles, but many proposals need to be developed through more detailed policy documents, such as the district plans and development briefs which will take time to prepare. Large sites will take time to masterplan and commence development, especially where significant infrastructure is required. There is likely to be a contingency supply of housing from unallocated sites, including capacity delivered through the urban areas and across rural service centres and service villages. This provides some buffer for slippage in the anticipated delivery of larger sites.
- 7.1.3 Delivering the strategy will also require a wide range of private, public sector and voluntary bodies working together. In preparing the strategy, the JCS authorities have worked with infrastructure providers and landowners/developers to establish that the allocated strategic sites are deliverable. If circumstances change, the JCS authorities will implement the measures set out below to ensure that the required housing and employment needs will still be met during the plan period. Any requirement to bring forward additional sites or alternative strategies in local plans will need to be in line with the distribution strategy of this plan as set out in this document in Policies SP1 and SP2.

Monitoring

- 7.1.4 Monitoring the performance of the Plan is essential to assess the effectiveness of the JCS and to record whether proposals and policies are being implemented and delivered. The outputs of appropriate monitoring will enable the councils to be fully informed of the progress of development in the area and whether a full or partial review of the plan is necessary.
- 7.1.5 The NPPF sets out that plans should be flexible to adapt to changing circumstances. The councils are committed to reviewing the plan if delivery issues emerge through monitoring, and will implement measures to ensure that housing, employment and infrastructure needs are met during the plan period.
- 7.1.6 In order to ensure effective monitoring, a Monitoring Framework has been prepared, setting out key indicators that will track the delivery of the plan.
- 7.1.7 The tables below set out the indicators in relation to each JCS objective. They include any specifically-identified target, the source of the data, and the frequency of monitoring. The range of indicators reflects the JCS's relationship with other plans and programmes and

therefore includes relevant national indicators and other local indicators such as those from the Local Transport Plan (LTP).

- 7.1.8 The monitoring outcomes will be reported through a single JCS Authority Monitoring Report (AMR) which will be regularly updated. The AMR is required to outline the progress in preparing the documents and assess the extent to which the policies are being implemented and their effectiveness. Where a policy is not meeting its objective, the AMR will explain why and suggest what action should be taken. The monitoring framework itself will be reviewed as part of the AMR.
- 7.1.9 The NPPF requires plans to be flexible and responsive to change. If monitoring indicates that delivery problems are emerging or that circumstances are changing in other ways, the JCS authorities will consider implementing some or all the following measures to bring forward development:
- Working with developers and infrastructure providers to remove obstacles to the delivery of sites
 - Seeking alternative sources of funding if problems with infrastructure provision is delaying development of key strategic sites
 - The early release of safeguarded land
 - Identifying alternative site(s) in general accordance with the distribution strategy of this plan as set out in Policies SP1 and SP2 which may be delivered through District Plans
 - Working with other authorities under the Duty to Co-operate to address any unmet needs. This will include continued cross-boundary working with Stroud District Council and Wychavon District Council.

Review

Housing Supply Review Mechanism

- 7.1.10 To reflect the government's emphasis on flexibility, the methodology for a JCS review in whole or in part is based upon a trigger mechanism. The trigger mechanism solely for monitoring purposes is a 10% buffer applied to the Housing Requirement of each JCS Authority on an annual basis. This mechanism will serve as an early warning to the JCS Authorities when a housing land supply shortfall could be imminent and corrective action is required. Thus the mechanism would be triggered where completions in any year fell below 110% of the Trajectory.
- 7.1.11 In the event of the strategic allocations cumulatively delivering less than 75% of their projected housing completions (considered annually), over three consecutive years (based on the trajectories set out in the Housing Implementation Strategy), this will trigger the need for the consideration of a partial or full JCS review.**
- 7.1.12 In line with the Gloucestershire devolution bid to the Government, any full or partial review is intended to be aligned with the other Gloucestershire authorities. This is intended to begin within 5 years of adoption of the JCS in line with national guidance.

"We will work together to achieve ... core strategies and local plans ... and coordination of plan reviews by 2020" (Gloucestershire Devolution Bid - September 2015)

Retail Review

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

Gloucester Housing Supply Review

- 7.1.14 As presented in the housing trajectories below, Gloucester City has an identified shortfall against the total JCS housing requirement of 1,346 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.

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

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

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

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

Tewkesbury Housing Supply Review

- 7.1.19 As presented in the housing trajectories below, Tewkesbury Borough has an identified shortfall against the total JCS housing requirement of 2,455 dwellings. This shortfall has been significantly exacerbated by a recent decision by the Defence Infrastructure Organisation regarding the now delayed release of the MoD Ashchurch strategic allocation which was expected to deliver 2,125 dwellings to 2031. Despite this shortfall, Tewkesbury Borough can maintain at least a 6.3 years supply of housing land and sufficient sites to deliver housing in the short to medium term. However, it is critical that the shortfall is addressed over the plan period and the JCS authorities are providing an approach to dealing with this in a strategic and plan-led way.

7.1.20 To deal with the shortfall the JCS authorities will undertake a review of Tewkesbury's housing supply immediately after the adoption of the JCS.

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

Policy REV1: Gloucester and Tewkesbury Housing Supply Review

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

Trajectories

- 7.1.27 Under each Council, the table gives the delivery by year split into other delivery and strategic allocations, followed by the total and cumulative calculations. This is then followed by the annual requirements, which for the case of Cheltenham has a stepped approach. The last two columns give the net difference between requirements and completions and annual requirement taking into account past/projected completions.
- 7.1.28 Then again for each Council is a chart which graphically illustrate the requirement versus completions on a cumulative basis. For each Council, the 5 years supply calculation is provided.

Approach to Previous Delivery Shortfalls Against the Housing Requirement

- 7.1.29 The JCS examination included a discussion regarding whether any plan period shortfalls in delivery could be spread over the remainder of the plan period (Liverpool approach), allowing time for sites to begin delivery to address it. The Submission JCS was accompanied by 5 year supply calculations that included the entire shortfall within the first 5 years (Sedgefield approach). However, it is considered that there is real merit in using the Liverpool approach and spreading the shortfall across the plan period.
- 7.1.30 The use of the Liverpool approach has been found to be acceptable in a recent Inspector's report on the Basingstoke and Deane Local Plan 2011-2029 dated 6th April 2016. In his report, the Inspector states (at paragraph 94):

"The Council's reasons for pursuing the Liverpool approach are linked to its partial reliance on several large sites, which require the provision of significant infrastructure prior to the completion of the first dwellings. These major allocations, which I deal with below in more detail, are sustainably located, near to the main urban areas, especially Basingstoke; they can achieve economies of scale and important community and environmental provision. In my view, these benefits outweigh the delay in their implementation. I therefore support the use of the Liverpool approach for Basingstoke and Deane."

- 7.1.31 In this case it was noted that the larger allocations would be delivering a significant proportion of the area's housing need. However, the challenge in delivering these allocations was recognised and that it would take more time for maximum delivery of housing to occur on these sites, particularly due to infrastructure provision. In this Inspector's view the shortfall should be spread across the plan period to allow time for the larger allocations to deliver. The situation at Basingstoke and Dean is comparable and relevant to the JCS.
- 7.1.32 The JCS strategic allocation sites are anticipated to start delivering at different years during the plan period and the delivery on each site is staggered to make an allowance for sites to

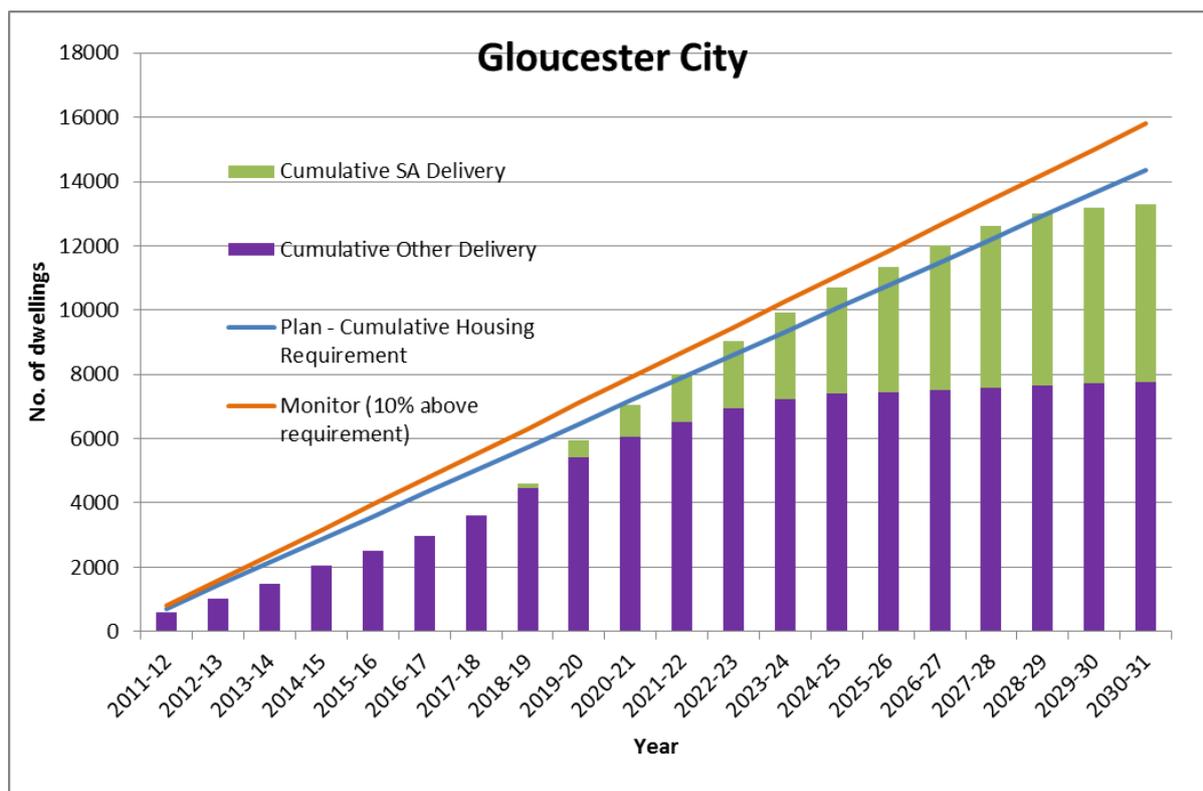
build up to maximum annual delivery over a number of years. The use of the Liverpool approach, as per the Basingstoke and Dean example, would allow time for these sites to come forward to help meet the previous shortfall and deliver the ongoing annual requirements.

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

Gloucester

7.1.34 The chart for Gloucester, illustrates a historic undersupply, but an over-supply in the middle plan period which gives a comfortable 5-year supply using the Liverpool method. The latter 3 years of the plan period shows the shortfall. However, an early review of Gloucester's housing supply will enable sites to be identified to meet the full requirement.

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	Liverpool Manage - annual requirement taking account of past/projected completions
2011-12	593	0	593	593	718	718	125	718
2012-13	430	0	430	1023	718	1436	413	724
2013-14	476	0	476	1499	718	2154	655	740
2014-15	554	0	554	2053	718	2872	819	754
2015-16	470	0	470	2523	718	3590	1067	766
2016-17	439	0	439	2962	718	4308	1346	785
2017-18	640	0	640	3602	718	5026	1424	808
2018-19	857	150	1007	4609	718	5744	1135	820
2019-20	977	375	1352	5961	718	6462	501	805
2020-21	622	450	1072	7033	718	7180	147	760
2021-22	464	525	989	8022	718	7898	-124	731
2022-23	431	600	1031	9053	718	8616	-437	706
2023-24	273	600	873	9926	718	9334	-592	669
2024-25	162	600	762	10688	718	10052	-636	644
2025-26	64	600	664	11352	718	10770	-582	627
2026-27	64	595	659	12011	718	11488	-523	621
2027-28	64	545	609	12620	718	12206	-414	613
2028-29	64	325	389	13009	718	12924	-85	615
2029-30	64	100	164	13173	718	13642	469	690
2030-31	64	50	114	13287	718	14360	1073	953



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

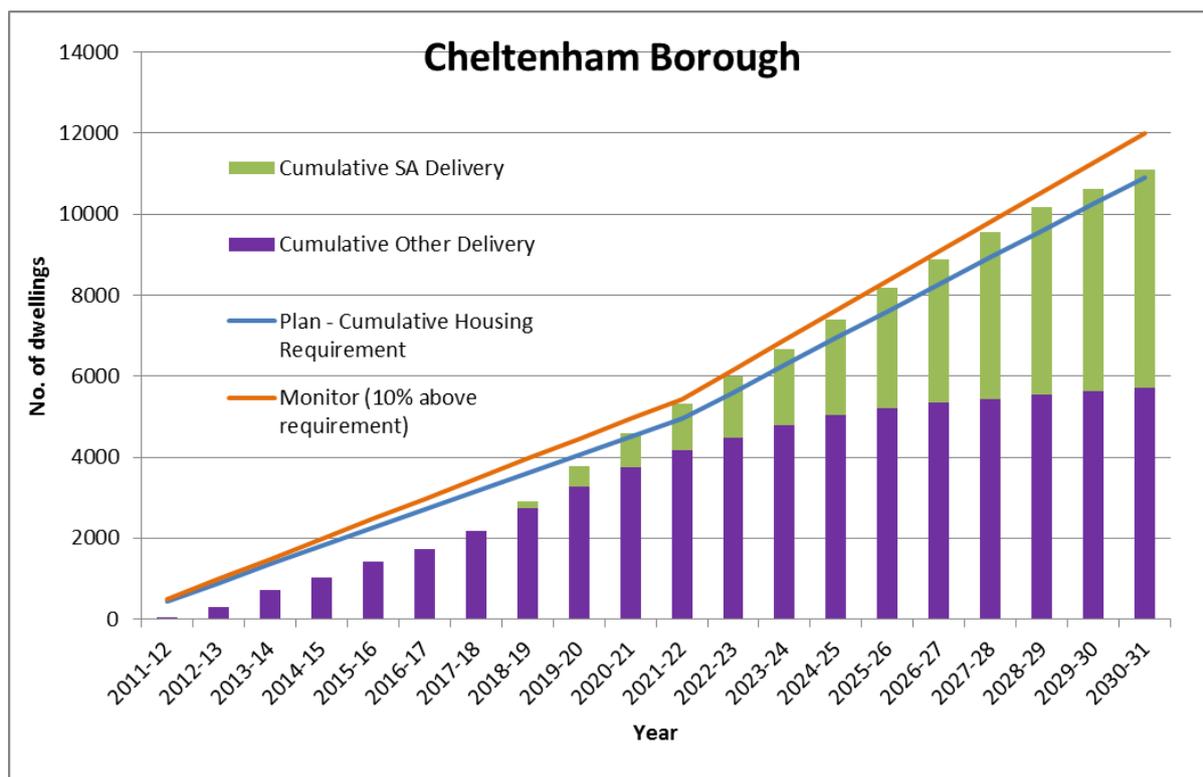
Cheltenham

7.1.35 The chart above for Cheltenham, illustrates a historic undersupply, but an over-supply in the middle and later plan period giving comfortable 5-year supply. A step trajectory has been employed up to 2021/2022, which improves the 5 year supply.

Cheltenham

Liverpool

Year	Other Delivery	SA Delivery	Total Projected Completions	Cumulative Completions	Plan - Annual Housing Requirement	Plan - Cumulative Housing Requirement	Monitor - No. of dwellings above or below cumulative requirement	Manage - annual requirement taking account of past/projected completions
2011-12	33	0	33	33	450	450	417	450
2012-13	268	0	268	301	450	900	599	471
2013-14	413	0	413	714	450	1350	636	482
2014-15	316	0	316	1030	450	1800	770	485
2015-16	397	0	397	1427	450	2250	823	495
2016-17	297	0	297	1724	450	2700	976	501
2017-18	448	0	448	2172	450	3150	978	515
2018-19	564	160	724	2896	450	3600	704	520
2019-20	528	365	893	3789	450	4050	261	504
2020-21	480	310	790	4579	450	4500	-79	472
2021-22	418	335	753	5332	450	4950	-382	443
2022-23	314	360	674	6006	663	5613	-393	412
2023-24	313	360	673	6679	663	6276	-403	619
2024-25	243	485	728	7407	663	6939	-468	613
2025-26	188	580	768	8175	663	7602	-573	596
2026-27	140	580	720	8895	663	8265	-630	568
2027-28	83	580	663	9558	663	8928	-630	537
2028-29	93	510	603	10161	663	9591	-570	506
2029-30	79	380	459	10620	663	10254	-366	473
2030-31	92	380	472	11092	663	10917	-175	480

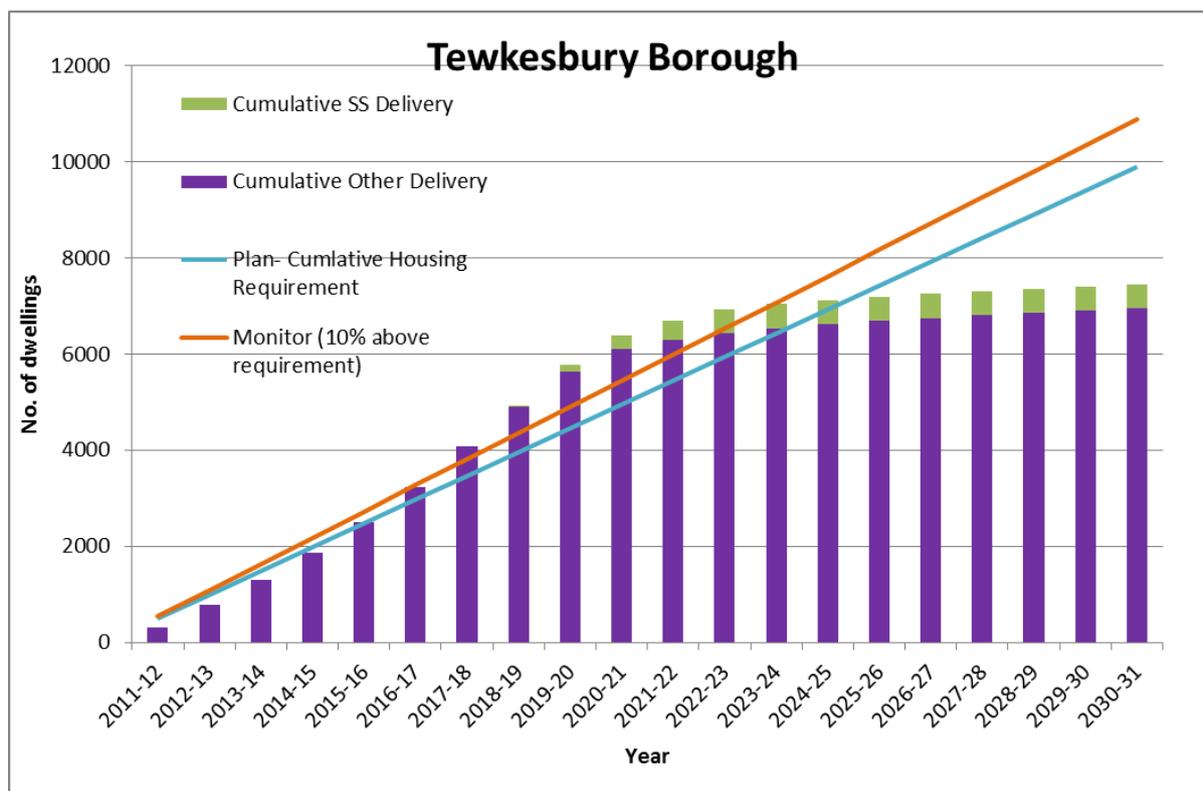


Pre Adoption Delivery		Explanation	20% Buffer	
A	CBC Annual Housing Requirement		450	450
B	Number of years into the plan period to adoption		7	7
C	Requirement to plan adoption		2700	2700
D	Actual Delivery 2011-2017		1724	1724
E	Total anticipated Delivery to Plan adoption	E = D	1724	1724
F	Anticipated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

Tewkesbury

7.1.36 The charts below for Tewkesbury, demonstrates sufficient housing land supply, including a 5 year supply, until the middle of the plan period at 2024/25 where there is a shortfall against the cumulative housing requirements. This will enable adequate time to undertake an immediate review of Tewkesbury's housing supply while maintaining a 5 year supply.

Tewkesbury							Sedgefield	
Year	Other Delivery	SA Delivery	Total Completions and Projected Completions	Cumulative Completions	Plan - Annual Housing Requirement	Plan - Cumulative Housing Requirement	Monitor - No. of dwellings above or below cumulative requirement	Manage - annual requirement taking account of past/projected completions
2011-12	318	0	318	318	495	495	177	495
2012-13	462	0	462	780	495	990	210	530
2013-14	513	0	513	1293	495	1485	192	537
2014-15	572	0	572	1865	495	1980	115	533
2015-16	631	0	631	2496	495	2475	-21	518
2016-17	728	0	728	3224	495	2970	-254	491
2017-18	863	0	863	4087	495	3465	-622	444
2018-19	824	25	849	4936	495	3960	-976	371
2019-20	715	125	840	5776	495	4455	-1321	300
2020-21	481	125	606	6382	495	4950	-1432	231
2021-22	178	125	303	6685	495	5445	-1240	209
2022-23	147	100	247	6932	495	5940	-992	247
2023-24	106	0	106	7038	495	6435	-603	297
2024-25	76	0	76	7114	495	6930	-184	374
2025-26	76	0	76	7190	495	7425	235	458
2026-27	61	0	61	7251	495	7920	669	542
2027-28	56	0	56	7307	495	8415	1108	629
2028-29	46	0	46	7353	495	8910	1557	717
2029-30	46	0	46	7399	495	9405	2006	806
2030-31	46	0	46	7445	495	9900	2455	896



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

Strategic Allocations Trajectory (including Mitton in Wychavon)

Site Name	District	Net Site Capacity	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31
Land at West Cheltenham (whole site)	Cheltenham/ Tewkesbury Borough	1100		25	50	50	75	100	100	100	100	100	100	100	100	100
North West Cheltenham (whole site)	Cheltenham/ Tewkesbury Borough	4285		135	315	260	260	260	260	385	480	480	480	410	280	280
Innsworth	Tewkesbury Borough	1300		25	50	50	125	150	150	150	150	150	150	150		
Twigworth	Tewkesbury Borough	995			25	50	50	125	150	150	150	150	145			
South Churchdown	Tewkesbury Borough	1100			50	100	100	100	100	100	100	100	100	100	100	50
North Brockworth	Tewkesbury Borough	1500		75	150	150	150	150	150	150	150	150	150	75		
Winnycroft	Gloucester City	620		50	100	100	100	75	50	50	50	45				
Mitton	Wychavon District	500		25	125	125	125	100								
Total Delivery			0	335	865	885	985	1060	960	1085	1180	1175	1125	835	480	430

Monitoring Framework

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

Building a strong and competitive urban economy			
Indicator	Target	Source	Period
Net additional jobs created by sector (employment generating uses)	A minimum of 39,500 jobs created over the plan period	GCC Inform	Annually
Economically inactive persons aged 16-64	Maintain levels close to the south west and national average	ONS	Annually
Net amount of employment floorspace created by use class (employment-generating uses)	192ha of employment land delivered over the plan period.	Annual Employment Monitoring	Annually
Amount of employment land lost to other non-employment-generating uses	No target but annually assessed	Annual Employment Monitoring	Annually
Gross weekly earnings of full-time workers.	Maintain levels close to the south west and national average	ONS/NOMIS	Annually
Percentage of residents with NVQ Level 4 qualification and above	Maintain levels close to the south west and national average	ONS	Annually
Net new business start-ups	To increase business start-ups in the JCS area, improving on the rate of start-ups per 10,000 working age people against other English districts	GCC Inform	Annually

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

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

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

Listed Buildings, Registered Parks and Gardens, Conservation Areas, Battlefield and sites of archaeological importance including Scheduled Monuments			
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Delivering excellent design in new developments			
Indicator	Target	Source	Period
Proportion of Strategic Sites with comprehensive masterplans completed and agreed with the local planning authority	All Strategic Sites to have comprehensive masterplans to guide their future development	Internal monitoring	Annually

Meeting the challenges of climate change			
Indicator	Target	Source	Period
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	Annually
New developments incorporating Sustainable Drainage Systems (SuDS) development	No target but monitoring progress	Internal monitoring (SA indicator)	Annually
Installed Renewable Capacity for Gloucestershire	No target but monitoring progress	RegenSW Renewable Energy Progress Report – Annual Survey (SA indicator)	Annually
Number of planning permissions granted contrary to Environment Agency advice on flooding or water quality grounds.	No permissions granted contrary to EA advice	Internal monitoring	Annually

Promoting Sustainable Transport			
Indicator	Target	Source	Period
Increase use of bus	Increase number of bus passenger journeys	LTP Annual Progress Report.	Annually
Increase use of cycling	Increase the number of cycle users at sites across the county	LTP Annual Progress Report.	Annually
Increase use of rail	Increase the number of rail ticket sales from railway stations		
Journey time reliability on primary strategic routes	Maintain average journey	LTP Annual Progress Report	Annually

	times at 2015/16 levels		
Number of peak hour vehicle journeys	Restrict growth in the number of peak hour vehicle journeys on local access routes	LTP Annual Progress Report	Annually

Delivering a wide choice of quality homes			
Indicator	Target	Source	Period
Net dwelling completions, based on the set housing requirements and 5-year housing supply	To deliver against the established objectively assessed need over the plan period.	Annual Housing Monitoring	Annually
Net completions of Gypsy, Traveller and Travelling Showpeople accommodation against requirements, based on the set target	To deliver against the established objectively assessed need over the plan period.	Annual Housing Monitoring	Annually
Net affordable housing completions against annual requirements	To deliver against the established objectively assessed need over the plan period.	Internal monitoring	Annually
Cumulative housing completions on JCS Strategic Allocations.	Minimum 75% of the annual cumulative requirement of the three districts.	Internal monitoring	Annually

Promoting healthy communities			
Indicator	Target	Source	Period
Number of Air Quality Management Areas	Reduce the number of Air Quality Management Areas.	LTP Annual Progress Report	Annually
Maintain bus passenger access to facilities	Maintain level of access to GP services and facilities by public transport within 45 mins	LTP Annual Progress Report	Annually
Number of essential community facilities lost or gained through the development process	No loss of community facilities	Internal monitoring	Annually

Appendix 1 - Superseded Policies

Cheltenham Borough Local Plan 2006

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

Explanatory note:

Where a JCS policy or policies is listed in the "JCS Policies to supersede Local Plan Policy" box these policies will directly replace the relevant 2006 Cheltenham Local Plan Policy on adoption of the JCS. Where the text reads "Local Plan Policy to be saved beyond the adoption of the JCS" These policies are to remain saved and in use after the JCS is adopted; we seek to replace these in time through the forthcoming 'district plan' the Cheltenham Local Plan. Where the text reads "deleted" these policies are to be deleted on adoption of the JCS as they have been replaced by national policy or have otherwise ceased to be useful.

CBC LP policy ref	Policy heading	JCS Policies to supersede Local Plan Policy
CP 1	Sustainable Development	SD10, SD14
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	SD4, 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	INF4, INF6, INF7
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	<i>Open Space in Conservation Areas</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
BE 2	<i>Residential Character in Conservation Areas</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
BE 3	<i>Demolition in Conservation Areas</i>	<i>Deleted</i>
BE 4	<i>Timing Of Demolition in Conservation Areas</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
BE 5	<i>Boundary Enclosures in Conservation Areas</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
BE 6	<i>Back Lanes in Conservation Areas</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
BE 7	<i>Parking on Forecourts or Front Gardens in Conservation Areas</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
BE 8	<i>Demolition of Listed Buildings</i>	<i>Deleted</i>
BE 9	<i>Alteration of Listed Buildings</i>	<i>Deleted</i>
BE 10	<i>Boundary Enclosures to Listed Buildings</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
BE 11	<i>Buildings of Local Importance</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
BE 12	<i>Advertisements and Signs</i>	<i>Deleted</i>
BE 13	<i>Advertisements and Signs in Conservation Areas</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
BE 14	<i>Advertisement Hoardings in Conservation Areas</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
BE 15	<i>Projecting Signs in Conservation Areas</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
BE 16	<i>Petrol Filling Stations and Car Sales in Conservation Areas</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
BE 17	<i>Advertisements And Signs On Listed Buildings</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
BE 18	<i>Design and Landscaping of New Roads</i>	<i>SD4</i>
BE 19	<i>Nationally Important Archaeological Remains</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
BE 20	<i>Archaeological Remains of Local Importance</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>

GE 1	<i>Public Green Space</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
GE 2	<i>Private Green Space</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
GE 3	<i>Development Within Extensive Grounds</i>	<i>SD4, SD9, INF3</i>
GE 4	<i>Pittville Park and Bouncers Lane Cemetery</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
GE 5	<i>Protection and Replacement of Trees</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
GE 6	<i>Trees And Development</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
GE 7	<i>Accommodation and Protection of Natural Features</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
CO 1	<i>Landscape Character</i>	<i>SD4, SD6, SD7</i>
CO 2	<i>Development within or affecting the AONB</i>	<i>SD7</i>
CO 3	<i>Rebuilding or Replacement of Buildings in the AONB</i>	<i>SD7</i>
CO 4	<i>Extension of Buildings in the AONB</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
CO 5	<i>Definition of Green Belt</i>	<i>SD5</i>
CO 6	<i>Development in the Green Belt</i>	<i>SD5, SD10</i>
CO 7	<i>Rebuilding or Replacement of Dwellings in the Green Belt</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
CO 8	<i>Extension of Dwellings in the Green Belt</i>	<i>Deleted</i>
CO 9	<i>Development at Cheltenham Racecourse</i>	<i>SD5</i>
CO 10	<i>Agricultural Land</i>	<i>SD14</i>
CO 11	<i>Agricultural and Forestry Dwellings</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
CO 12	<i>Farm Diversification Projects</i>	<i>SD1, SD4, SD6,</i>
CO 13	<i>Conversion of Rural Buildings</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>

CO 14	<i>Development Abutting the Countryside</i>	SD4, SD6
NE 1	<i>Habitats of Legally Protected Species</i>	SD9
NE 2	<i>Designated Nature Conservation Sites</i>	SD9
NE 3	<i>Biodiversity and Geodiversity of Local Importance</i>	SD9
NE 4	<i>Contaminated Land</i>	SD14
EM 1	<i>Employment Uses</i>	SD1
EM 2	<i>Safeguarding of Employment Land</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
HS 1	<i>Housing Development</i>	SD10
HS 2	<i>Housing Density</i>	SD10
HS 3	<i>Sub-Division of Existing Dwellings</i>	SD4
HS 4	<i>Affordable Housing</i>	SD12
HS 5	<i>Mixed Communities</i>	SD11
HS 6	<i>Elderly Persons Housing</i>	SD11
HS 7	<i>Loss of Residential Accommodation</i>	<i>Deleted</i>
HS 8	<i>Houses in Multiple Occupation</i>	<i>Deleted</i>
RT 1	<i>Location of Retail Development</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
RT 2	<i>Retail Development in the Core Commercial Area</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
RT 3	<i>Non-A1 Uses in Primary Shopping Frontages</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
RT 4	<i>Retail Development in Local Shopping Centres</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
RT 5	<i>Non A1 Uses In Local Shopping Centres</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
RT 6	<i>New Local Shopping Centres</i>	<i>Deleted</i>
RT 7	<i>Retail Development in Out of Centre Locations</i>	<i>Deleted</i>
RT 8	<i>Individual Convenience Shops</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>

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	INF4
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	INF4
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	SD5, SD6, SD7
RC 12	Golf Courses	SD5, SD6, SD7
RC 13	Public Rights of Way in the Countryside	INF3
UI 1	Development in Flood Zones	INF2
UI 2	Development and Flooding	INF2
UI 3	Sustainable Drainage Systems	INF2
UI 4	Maintenance Strips for Watercourses	Local Plan Policy to be saved beyond the adoption of the JCS
UI 5	Culverting of Watercourses	INF2

UI 6	Development Near Sewage Treatment Works	SD5, SD14
UI 7	Renewable Energy	SD3, SD4, SD14, INF5
UI 8	Telecommunications Installations	INF6, SD14
TP 1	Development and Highway Safety	SD4, INF1
TP 2	Highway Standards	SD4, INF1
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

Tewkesbury Borough Local Plan 2006

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

POLICY REF	TITLE	SUPERSEDED BY JCS? YES/NO	SUPERSEDING JCS POLICY /POLICIES
GNL2	DESIGN REQUIREMENTS FOR MAJOR DEVELOPMENT PROPOSALS	YES	SD4
GNL6	PROVISION FOR ART.	NO	
GNL8	ENERGY EFFICIENT DEVELOPMENT	YES	SD3
GNL11	IMPLEMENTATION	YES	INF6 INF2
GNL13	ADVERTISEMENTS	NO	
GNL15	NEW COMMUNITY FACILITIES	YES	INF4
GNL17	PRE-SCHOOL CHILDCARE FACILITIES	NO	
HOU1	HOUSING ALLOCATIONS	NO	
HOU2	LARGER SETTLEMENTS CONTAINING A PRIMARY LEVEL OF COMMUNITY FACILITIES AND SERVICES	YES	SP2

			SD10
HOU3	OTHER VILLAGES (INFILLING ONLY)	YES	SP2 SD10
HOU4	OTHER SETTLEMENTS/RURAL AREAS	YES	SP2 SD10
HOU5	NEW HOUSING DEVELOPMENT WITHIN EXISTING RESIDENTIAL AREAS	YES	SP2 SD4 SD10 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	SD11
HOU12	MOBILE HOMES	NO	
HOU13	AFFORDABLE HOUSING	YES	SD12
HOU14	AFFORDABLE HOUSING (EXCEPTIONS SCHEMES)	YES	SD12
HOU16	MINSTERWORTH TRAVELLERS' SITES	NO	
GRB1	GREEN BELT	YES	SD5
EMP1	MAJOR EMPLOYMENT SITES	NO	
EMP2	EMPLOYMENT USES WITHIN SETTLEMENTS OUTSIDE ALLOCATED SITES	NO	
EMP3	RURAL BUSINESS CENTRES	NO	
EMP4	RURAL EMPLOYMENT POLICY	YES	SD1
EMP5	EXISTING EMPLOYMENT USES OUTSIDE SETTLEMENTS, ALLOCATED SITES AND RURAL BUSINESS CENTRES	YES	SD1
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	INF5
EVT2	LIGHT POLLUTION	YES	SD14
EVT3	NOISE POLLUTION	YES	SD14
EVT5	DEVELOPMENT IN HIGH, AND LOW TO MEDIUM FLOOD RISK AREAS	YES	INF2
EVT8	DEVELOPMENT NEAR SEWAGE TREATMENT WORKS	NO	
EVT9	SUSTAINABLE URBAN DRAINAGE SYSTEMS	YES	INF2
LND2	SPECIAL LANDSCAPE AREA (SLA)	NO	
LND3	LANDSCAPE PROTECTION ZONE (LPZ)	NO	
LND4	LANDSCAPE - COUNTRYSIDE PROTECTION	YES	SD6
LND5	IMPORTANT OPEN SPACES	NO	
LND6	HISTORIC PARKS AND GARDENS	NO	

LND7	LANDSCAPING OF NEW DEVELOPMENTS	YES	INF3 SD6 SD4
TOR1	GENERAL POLICY	NO	
TOR2	SERVICED / SELF CATERING ACCOMMODATION	NO	
TOR4	NEW STATIC CARAVAN / LOG CABIN / CHALET SITES	NO	
TOR5	TOURING CARAVAN AND CAMPING SITES	NO	
TOR6	EXTENSIONS TO EXISTING CARAVAN / CAMP SITES	NO	
TOR7	FARM DIVERSIFICATION	YES	SD1
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	SD2
RET8	GARDEN CENTRES	NO	
RET9	FARMSHOPS / PICK-YOUR-OWN	YES	SD1
RCN1	OUTDOOR PLAYING SPACE	NO	
RCN2	PROVISION OF SPORTS FACILITIES	NO	
RCN3	NEW ARTS, ENTERTAINMENT AND LEISURE FACILITIES	YES	INF4 SD2
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	YES	SD14

	<i>COUNTRYSIDE</i>		
<i>RCN10</i>	<i>ALLOTMENTS</i>	<i>NO</i>	
<i>NCN3</i>	<i>PROTECTION OF OTHER SITES OF NATURE CONSERVATION OR GEOLOGICAL / GEOMORPHOLOGICAL INTEREST</i>	<i>NO</i>	
<i>NCN5</i>	<i>PROTECTION OF IMPORTANT NATURAL FEATURES / BIODIVERSITY</i>	<i>YES</i>	<i>SD9</i>
<i>NCN6</i>	<i>NEW AND RESTORED PONDS</i>	<i>NO</i>	
<i>AGR2</i>	<i>AGRICULTURAL DWELLINGS</i>	<i>NO</i>	
<i>AGR3</i>	<i>REMOVAL OF AGRICULTURAL WORKERS' OCCUPANCY CONDITIONS</i>	<i>NO</i>	
<i>AGR4</i>	<i>AGRICULTURAL DIVERSIFICATION</i>	<i>YES</i>	<i>SD1</i>
<i>AGR5</i>	<i>NEW AGRICULTURAL BUILDINGS</i>	<i>NO</i>	
<i>AGR6</i>	<i>RE-USE AND ADAPTATION OF RURAL BUILDINGS – GENERAL</i>	<i>NO</i>	
<i>AGR7</i>	<i>RE-USE AND ADAPTATION OF RURAL BUILDINGS – RETENTION OF CHARACTER</i>	<i>NO</i>	<i>SD10</i>
	<i>LOCAL POLICIES</i>		
<i>AC1</i>	<i>LAND ADJACENT TO RAILWAY AT NORTHWAY LANE, NORTHWAY</i>	<i>NO</i>	
<i>AC3</i>	<i>COWFIELD FARM SOUTH</i>	<i>NO</i>	
<i>BI1</i>	<i>GILDERS CORNER</i>	<i>NO</i>	
<i>BI2</i>	<i>NORTH OF DEAN FARM, BISHOPS CLEEVE</i>	<i>NO</i>	
<i>BI3</i>	<i>MALVERN VIEW, BISHOPS CLEEVE</i>	<i>NO</i>	
<i>BI4</i>	<i>CLEEVE BUSINESS PARK, BISHOPS CLEEVE</i>	<i>NO</i>	
<i>BR1</i>	<i>BROCKWORTH AND HUCCLECOTE HOUSING SITES</i>	<i>NO</i>	
<i>BR2</i>	<i>GLOUCESTER BUSINESS PARK</i>	<i>NO</i>	
<i>BR3</i>	<i>BROCKWORTH / HUCCLECOTE DISTRICT CENTRE</i>	<i>NO</i>	
<i>BR5</i>	<i>MILL LANE, BROCKWORTH</i>	<i>NO</i>	
<i>BR6</i>	<i>KENNEL LANE, BROCKWORTH</i>	<i>NO</i>	
<i>CH1</i>	<i>SOUTH EAST CAMP</i>	<i>YES</i>	<i>SD5</i>
<i>CH2</i>	<i>GLOUCESTERSHIRE AIRPORT</i>	<i>YES</i>	<i>SD5</i>

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 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	

Gloucester Local Plan 1983

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

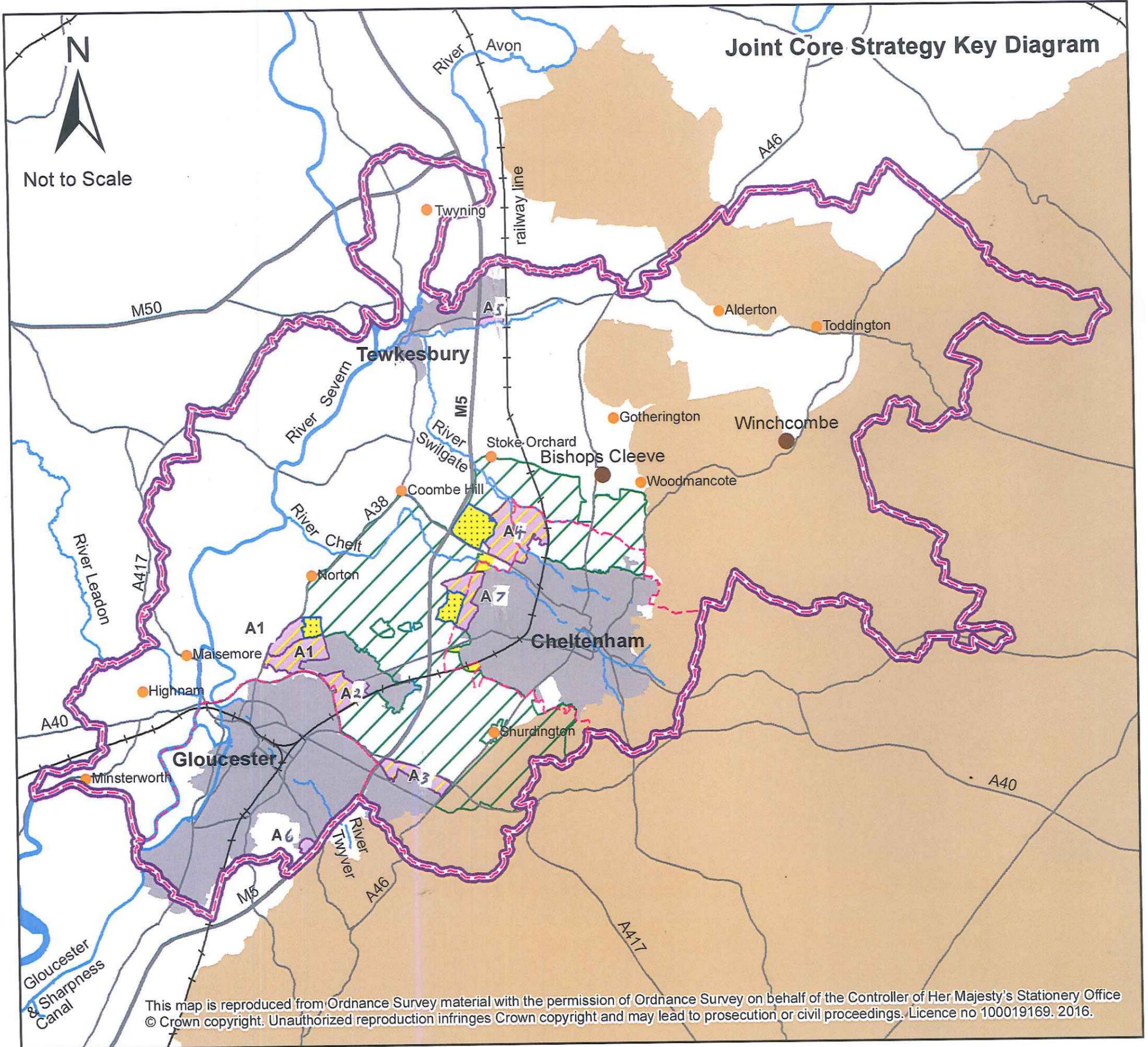
Local Plan Policy	Superseded by JCS ? Yes/ No/ Partial	Superseding JCS policy
<i>Introduction</i>	No	
<i>Objectives</i>	No	
<i>Finance</i>	No	
<i>Employment policies</i>	No	
<i>E.1 Release of industrial land sufficient for 5 years requirement</i>	No	
<i>E.2 Release of office development sufficient to cater for 5 years requirement</i>	No	
<i>H.1 – Release of land for residential development to cater for 5 years requirement</i>	No	
<i>H1c – Provision of additional housing sites to those identified in H1a will be encouraged in the city centre</i>	No	

Local Plan Policy	Superseded by JCS ? Yes/ No/ Partial	Superseding JCS policy
<i>H1e – Density and quality of housing development</i>	No	
<i>H3 – Preservation and revitalization of older housing stock</i>	No	
<i>H4 Housing provision for those whose needs are not met by the private sector</i>	Yes	SD11
<i>H4.b Provision of grants for adaptation of homes for the registered disabled</i>	No	
<i>A1.a Heights of buildings and protection of views</i>	No	
<i>A2 Particular regard will be given to the city’s heritage in terms of archaeological remains, listed buildings and conservation areas</i>	No	
<i>A2.d Demolition of listed buildings in conservation areas</i>	No	
<i>A3.a Investigation and resolution of environmental problems caused by traffic on Bristol Road and Barton Street</i>	No	
<i>A.4e – Development on or around Robinswood Hill will not be permitted except where there are exceptional circumstances</i>	No	
<i>A.5a – The inclusion of tourist related uses within the comprehensive redevelopment of the Docks area will be encouraged.</i>	No	
<i>A.5c – Conservation and maintenance of structures and settings of City’s historic fabric (various sites)</i>	No	
<i>A.5d – Redevelopment of Blackfriars as a tourist attraction</i>	No	
<i>A.6a – Provision of coach parking facilitate at Westgate Street and the Docks</i>	No	
<i>A7 – Encourage provision of an adequate level and mix of accommodation to satisfy visitor demand</i>	No	
<i>A7.a – Provision of appropriate self-catering accommodation. Conference Centre and central area hotels</i>	No	
<i>A7.b – Encourage Guest House developments along main radial routes and the city centre</i>	No	
<i>T.1.e – Pedestrian priority within traffic management schemes in the main shopping area of the city.</i>	No	
<i>T1.f – Pedestrian priority in the city centre outside the main shopping area</i>	No	

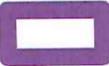
Local Plan Policy	Superseded by JCS ? Yes/ No/ Partial	Superseding JCS policy
<i>T2.d - Measures to facilitate rear access servicing</i>	No	
<i>T3 – Introduction of traffic regulation and control measures along Bristol Road and Southgate Street</i>	No	
<i>T3.a – Access to existing and future industrial premises will be assisted, where necessary, by traffic management and other measures</i>	No	
<i>T3.b – Consideration will be given to traffic management along Bristol Road</i>	No	
<i>T4.a- Differential charging of short and long stay car parks to discourage inappropriate use</i>	No	
<i>T4.k – Provision of car parking at private development in accordance with the Councils car parking standards</i>	No	
<i>T5.b – Early introduction of new bus services with new residential development</i>	Yes	INF1, INF6
<i>T6 – Measures will be introduced to encourage cycling</i>	Yes	INF1, INF3, INF6
<i>T6.c – Encourage cyclist-only routes</i>	Yes	INF1, INF3, INF6
<i>S1 – Main and strengthen Gloucester’s role as a sub-regional shopping centre and concentrate comparison shopping in the city except in exceptional circumstances</i>	Yes	SD2
<i>S1.a – Major comparison shopping will not usually be permitted outside the main shopping area</i>	Yes	SD2
<i>S1.e – Conversion of shops to other uses at ground floor level will not normally be allowed in the main shopping area</i>	No	
<i>S2.b- Major convenience shopping will not usually be permitted outside the main shopping area</i>	No	
<i>S3 – Continued provision of shopping facilities to meet local needs outside the City Centre will be encouraged</i>	No	
<i>S3.a Neighbourhood shopping facilities will be encouraged and sometimes required in developing residential areas</i>	No	
<i>S3.b – The City Council will seek to maintain the existing neighbourhood shopping provision in the City</i>	No	

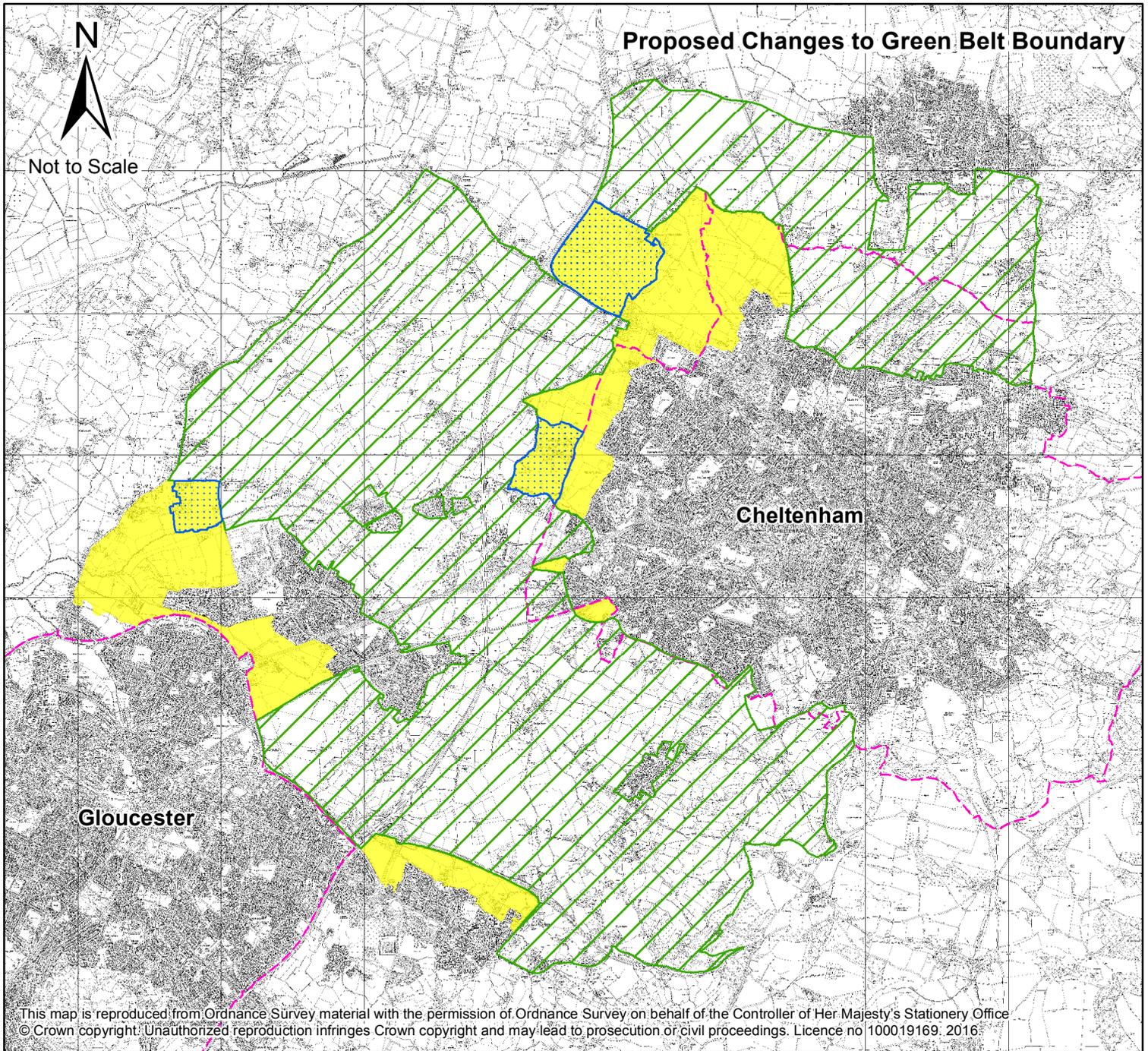
Local Plan Policy	Superseded by JCS ? Yes/ No/ Partial	Superseding JCS policy
<i>L1 – Retain public open space, provision with new development, and attempt provision where a shortfall has been identified.</i>	No	
<i>L.1a- Retain existing areas of public open space</i>	No	
<i>L.1c – In new developments new public open space will be provided in accessible, centralised locations. They must be no less than half an acre in size.</i>	No	
<i>L.1d – Where public open space already exists or there is a need for recreational facilities other than open space we will consider the provision of alternative leisure facilities at the cost of the developer.</i>	No	
<i>L.2b – Seek to provide additional sports facilities on public open space in new developments.</i>	Yes	INF6
<i>L3.c Inclusion of leisure facilities within the docks redevelopment and financial contribution towards the cost of transferring the British Waterways museum to Gloucester</i>	No	
<i>L3.d – Maintenance and protection of Robinswood Hill Country Park</i>	No	

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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)

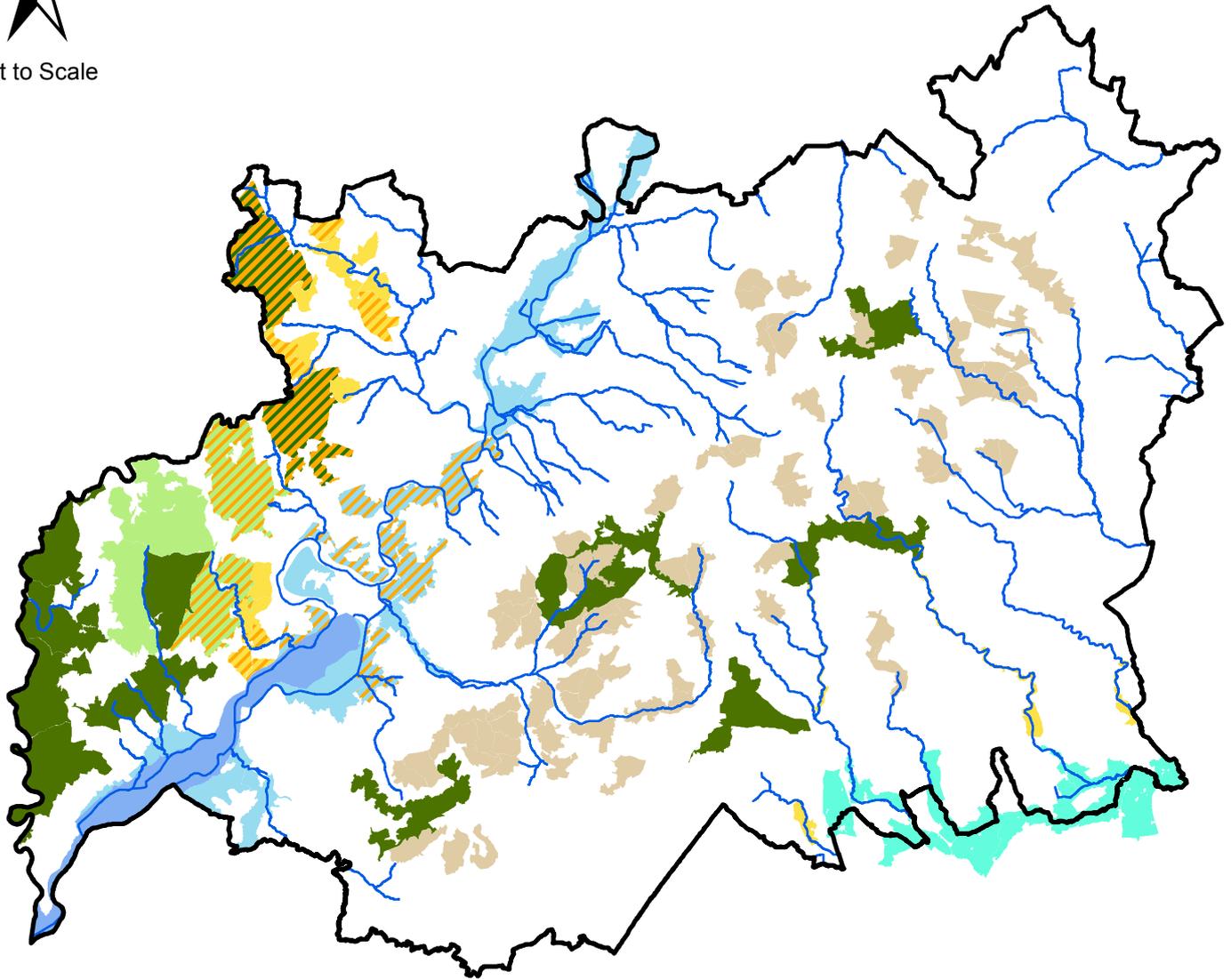


Key

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



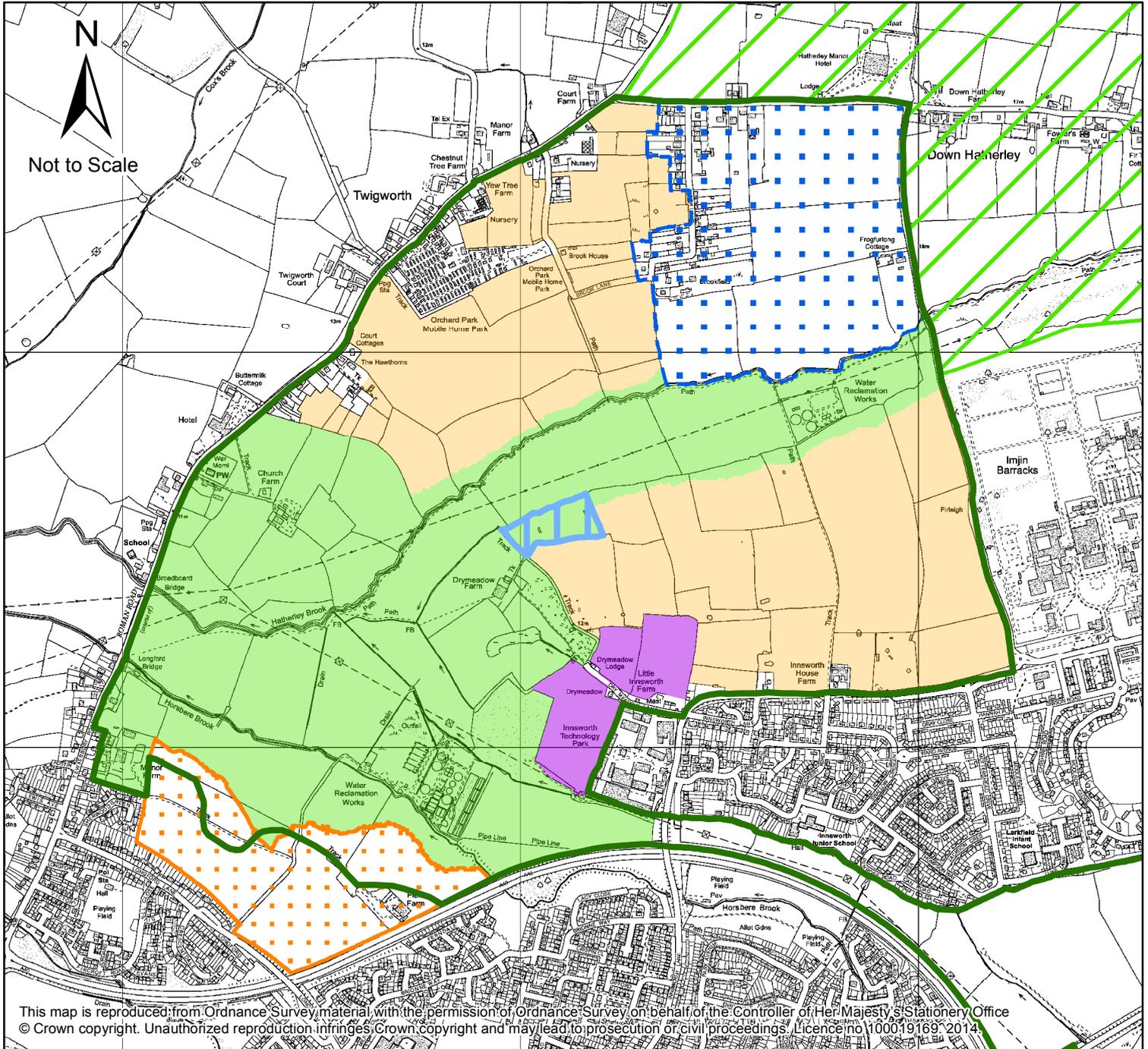
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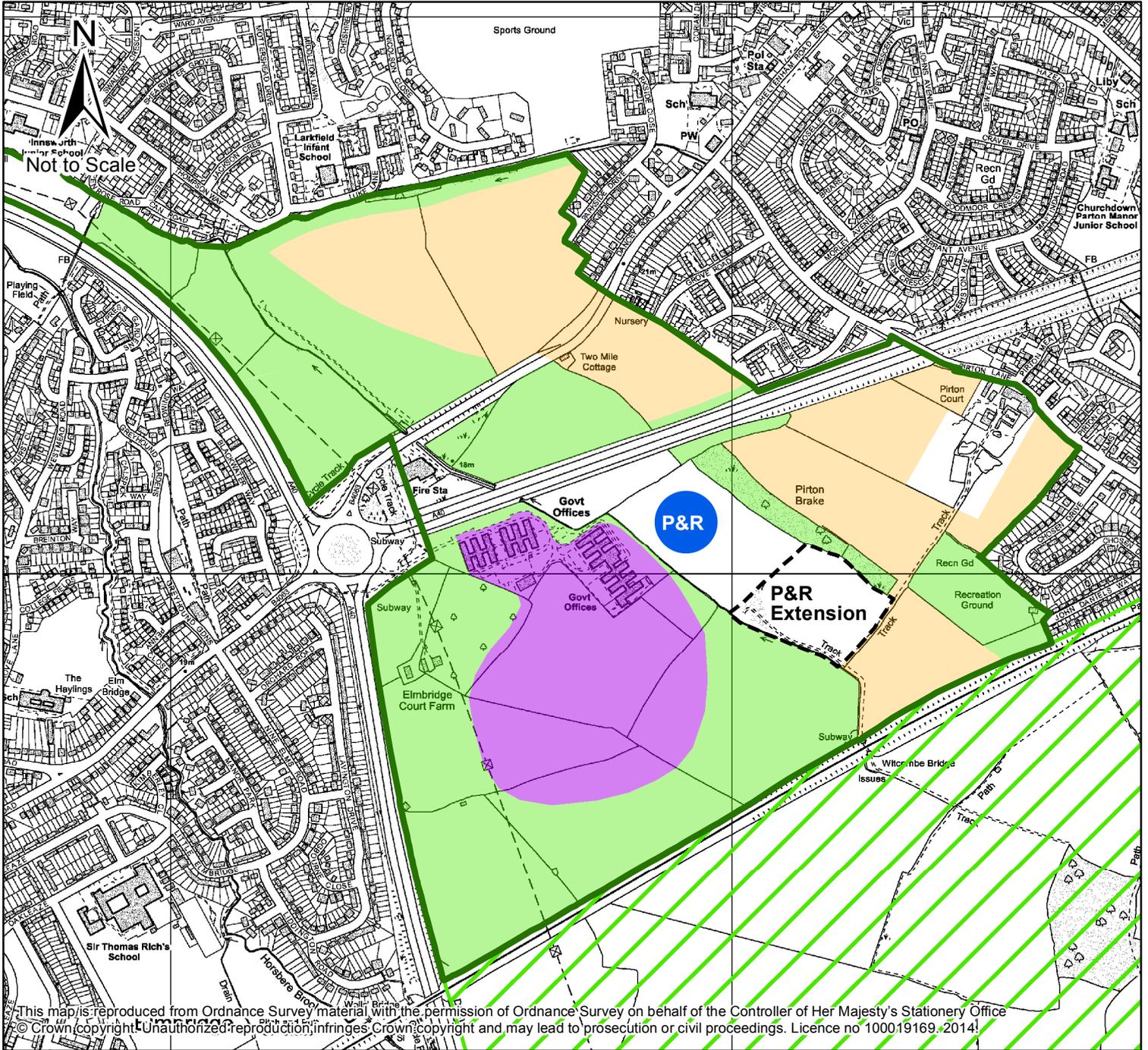
Key

-  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



Key

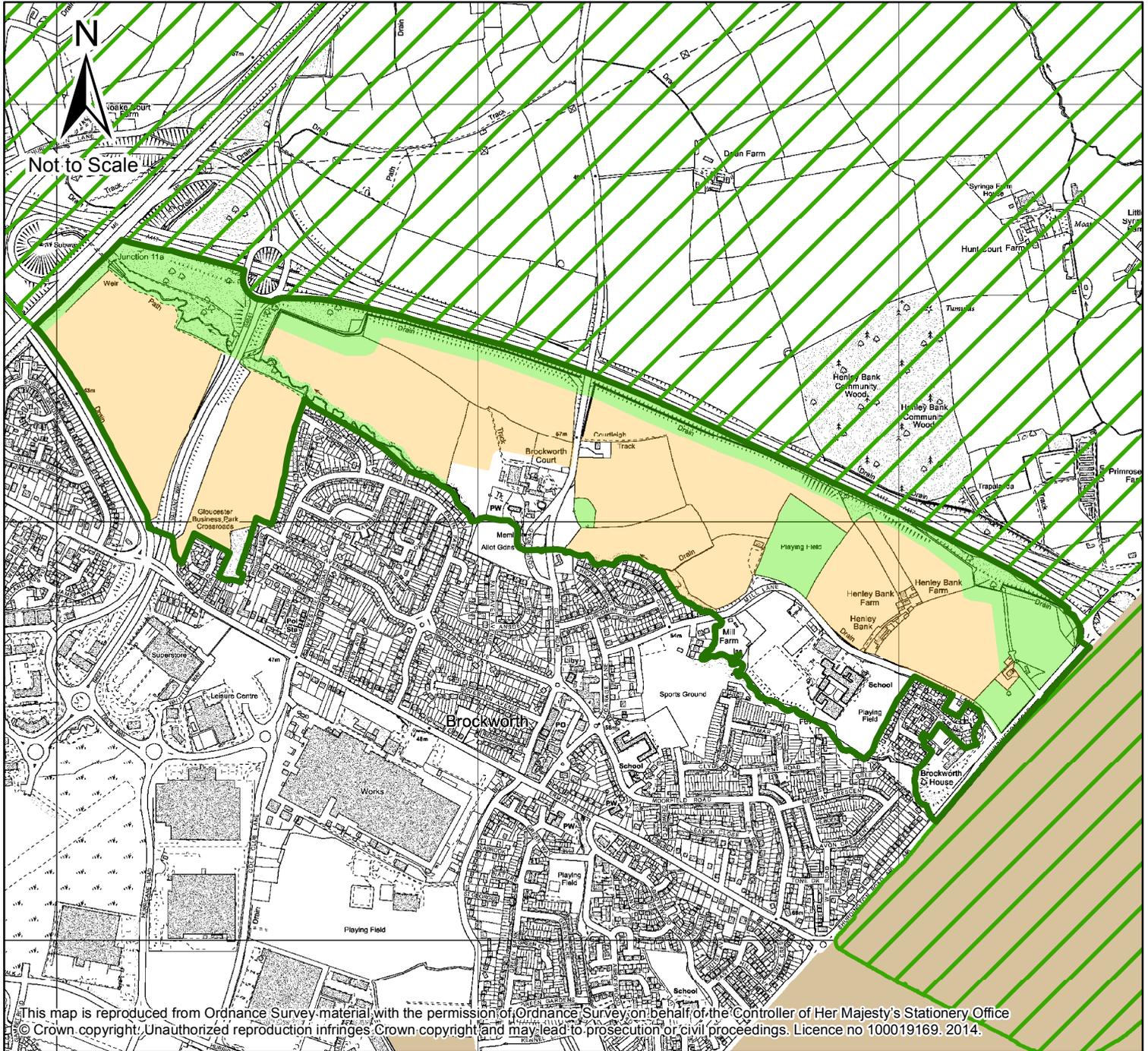
-  Housing and related infrastructure
-  Existing Housing Commitment
-  Employment and related infrastructure
-  Green Infrastructure and other supporting infrastructure
-  Areas removed from Green Belt
-  Green Belt (revised)
-  Site of Specific Scientific Interest
-  Safeguarded Area



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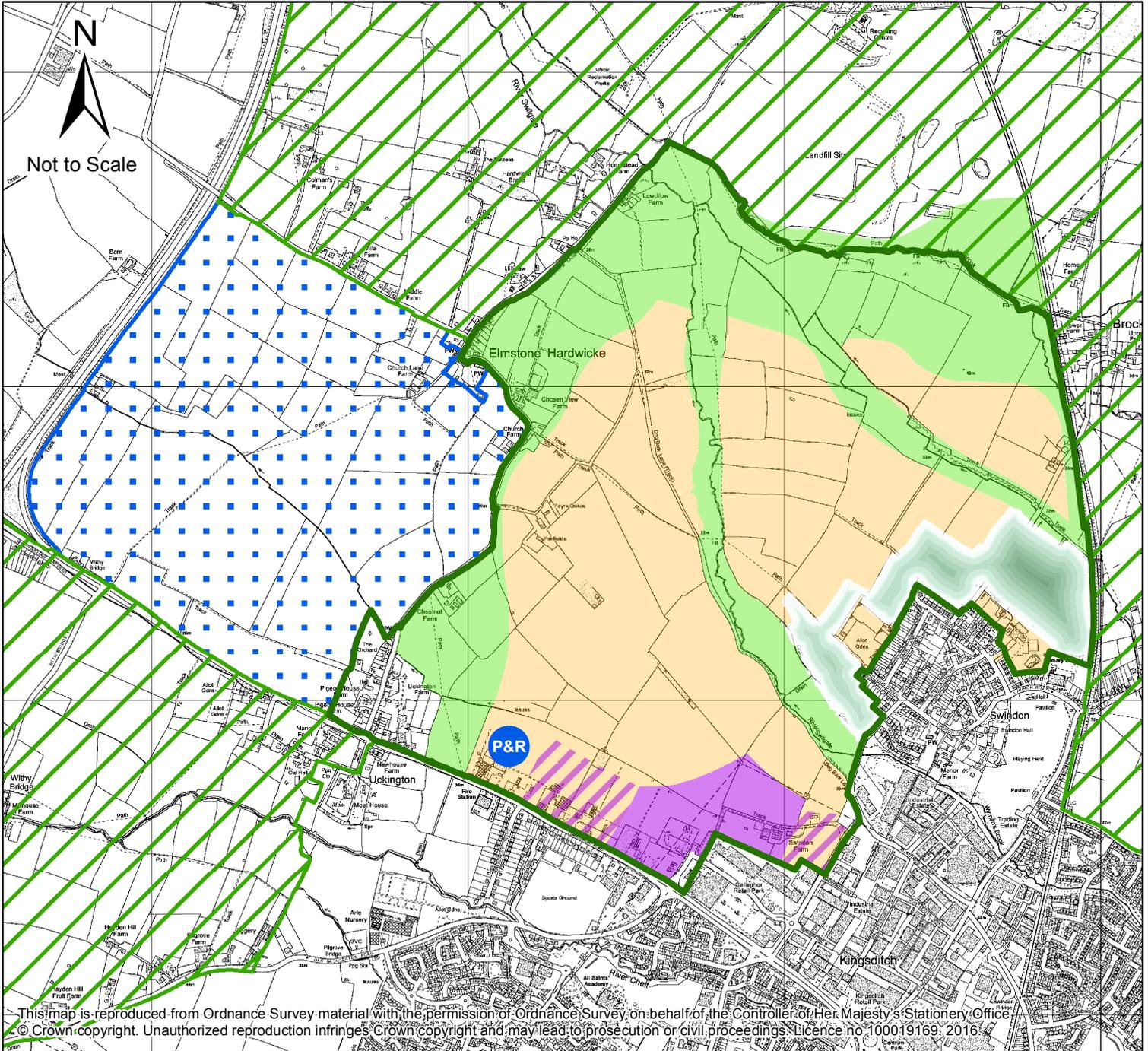
Key

-  Housing and related infrastructure
-  Employment and related infrastructure
-  Green Infrastructure and other supporting infrastructure
-  Areas removed from Green Belt
-  Green Belt (revised)
-  Proposed Park & Ride
-  Potential Park & Ride Extension



Key

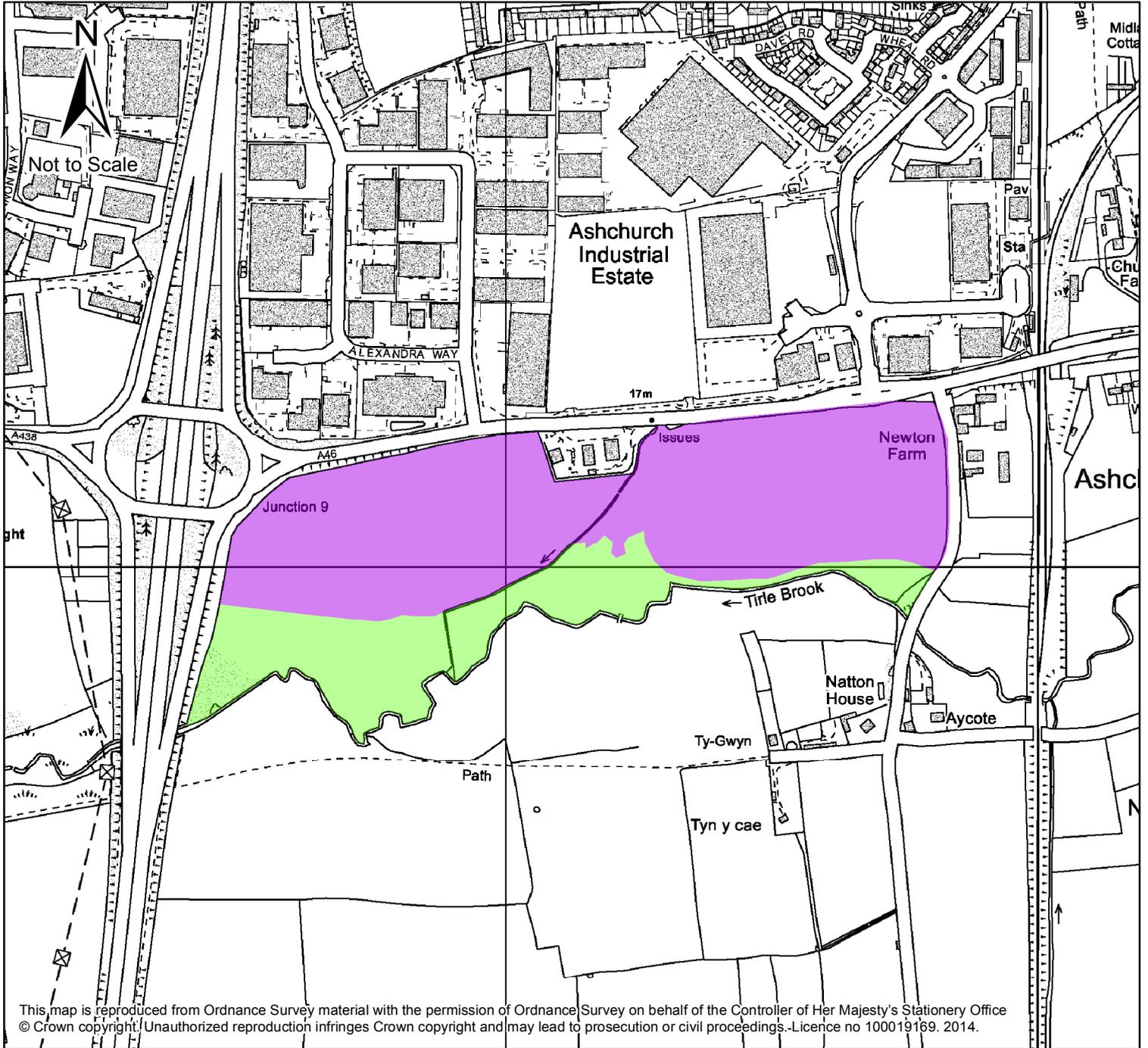
- Housing and related infrastructure
- Green Infrastructure and other supporting infrastructure
- Areas removed from Green Belt
- The Cotswolds Area of Outstanding Natural Beauty
- Green Belt (revised)



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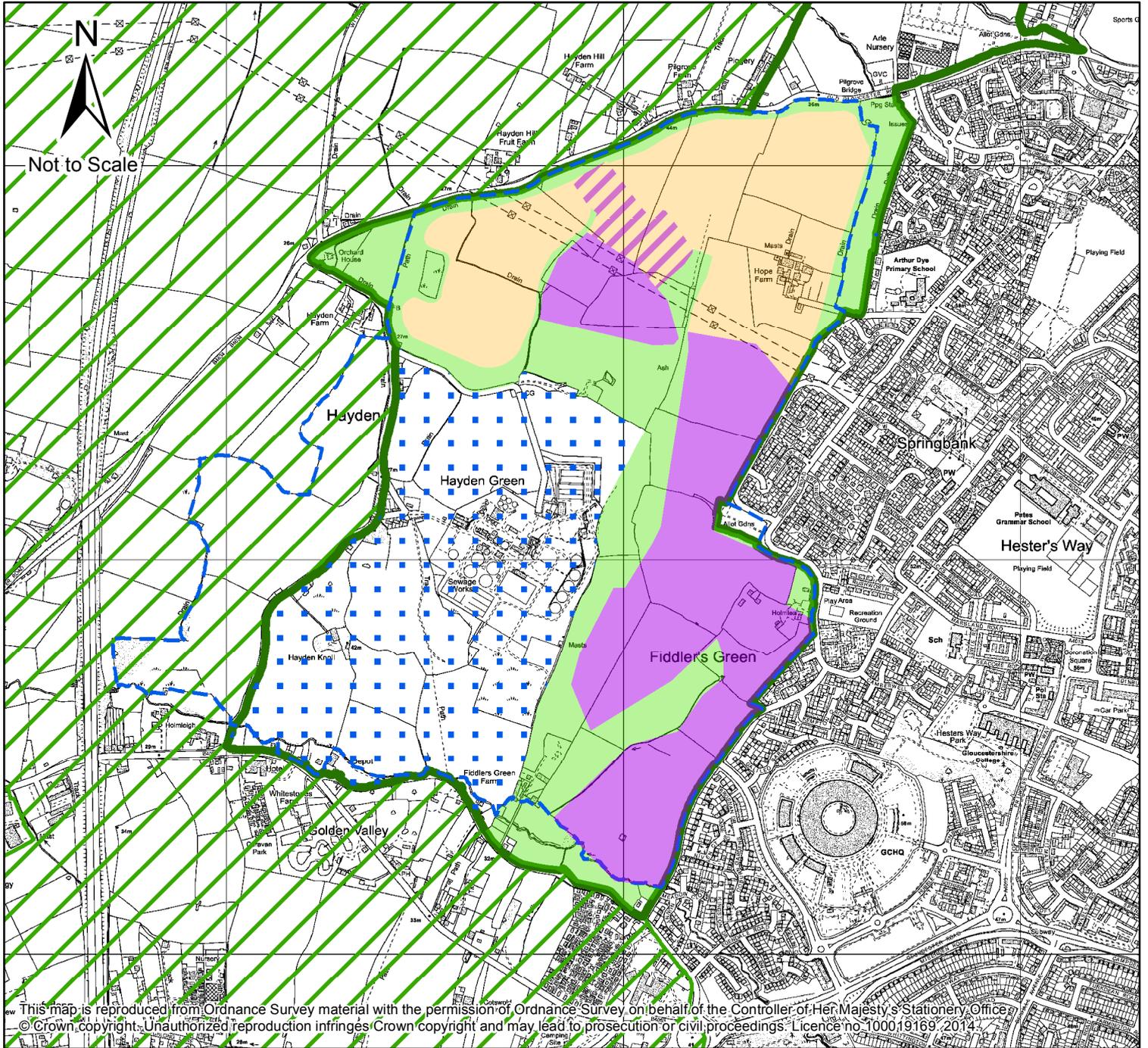
Key

-  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
-  Proposed Park & Ride



Key

-  Employment and related infrastructure
-  Green Infrastructure and other supporting infrastructure



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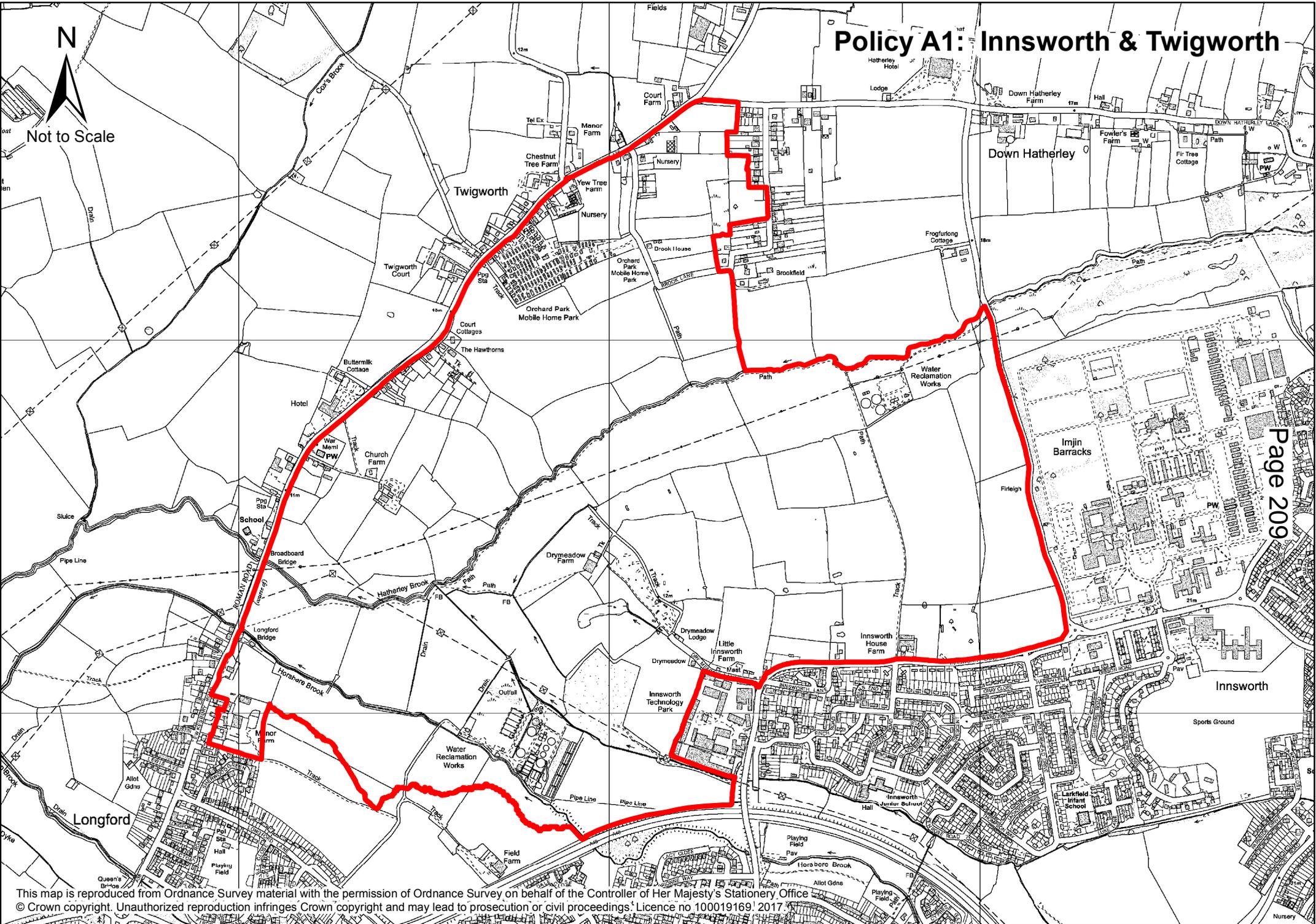
Key

-  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

Policy A1: Innsworth & Twigworth

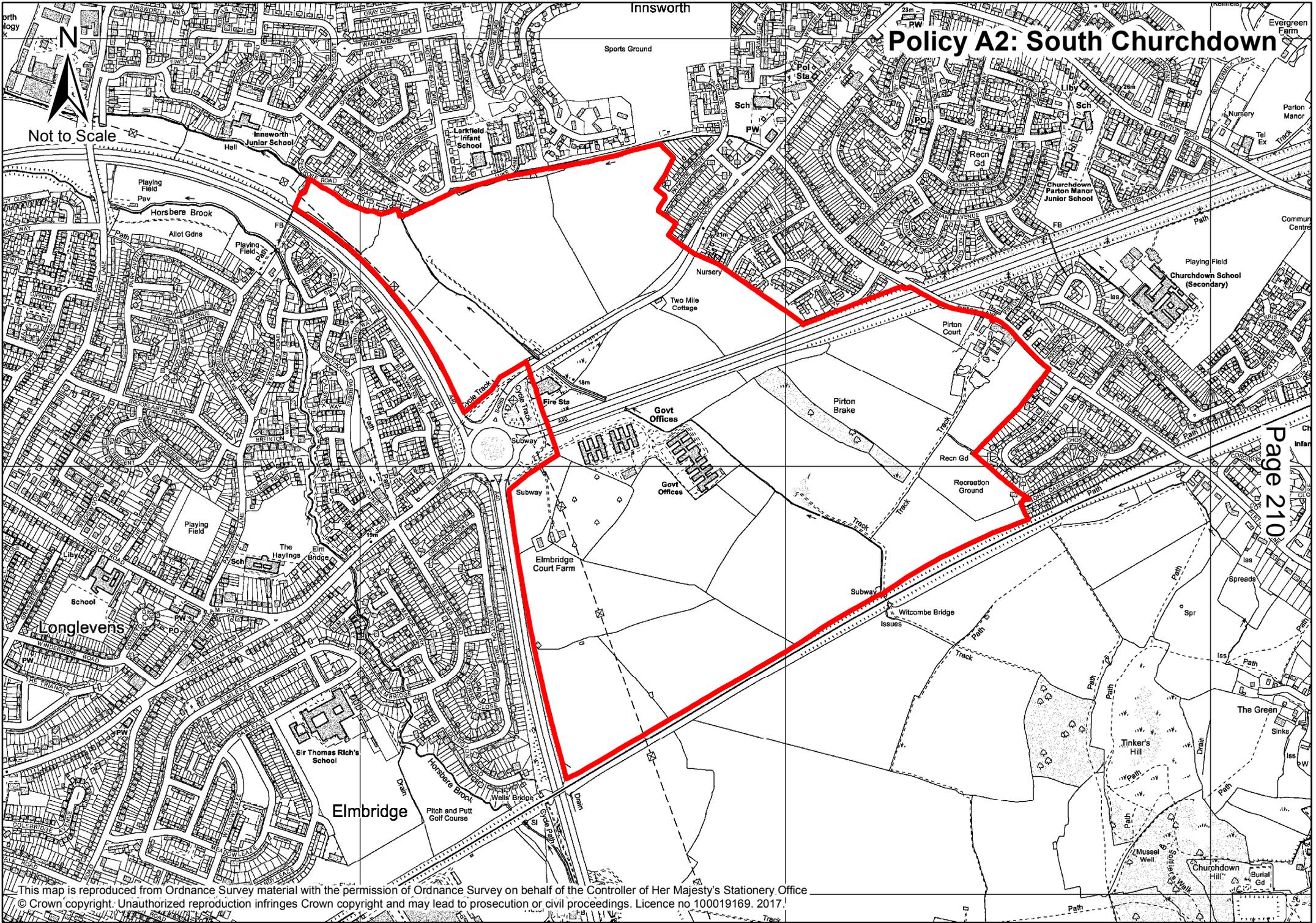
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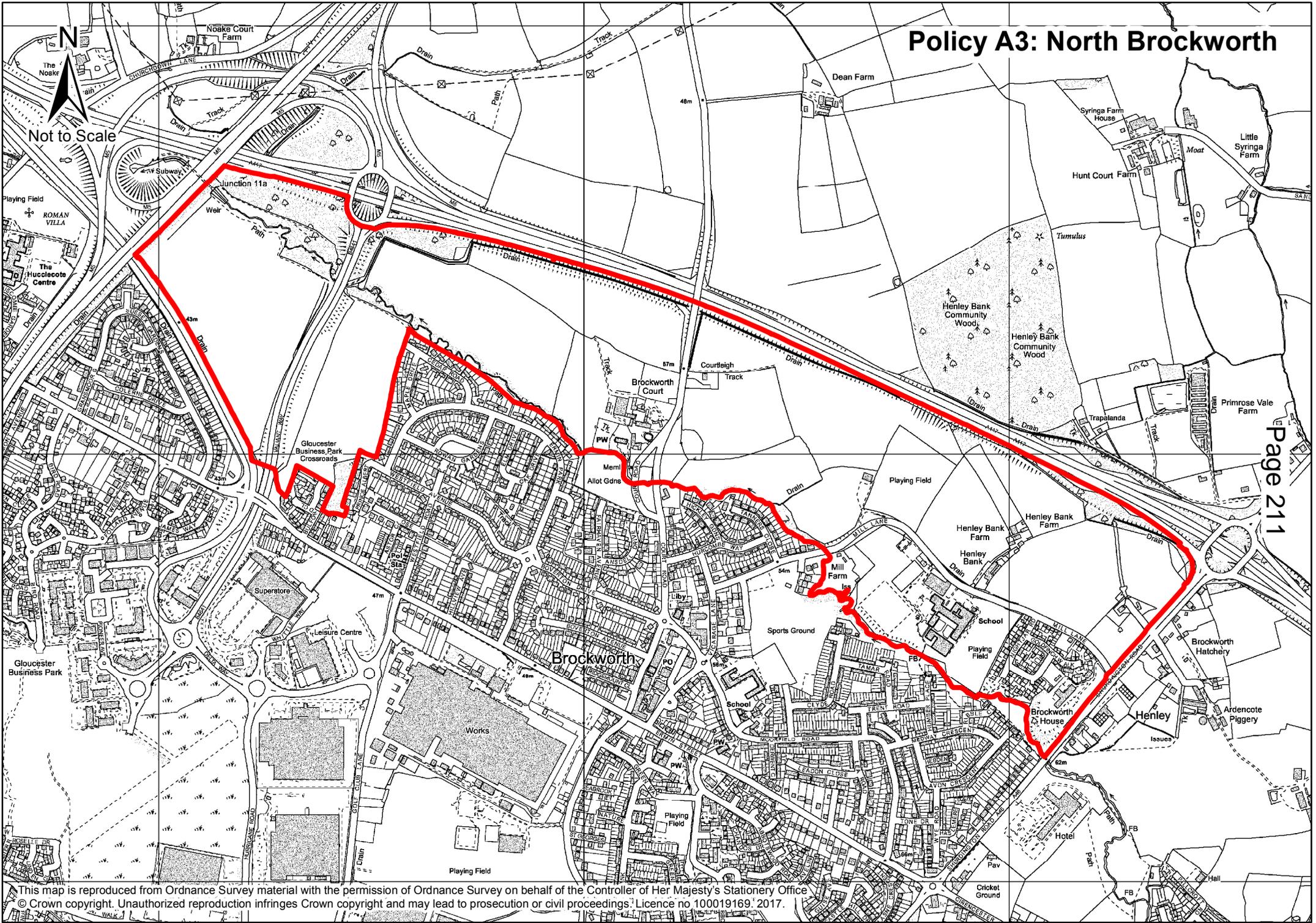
Policy A2: South Churchdown



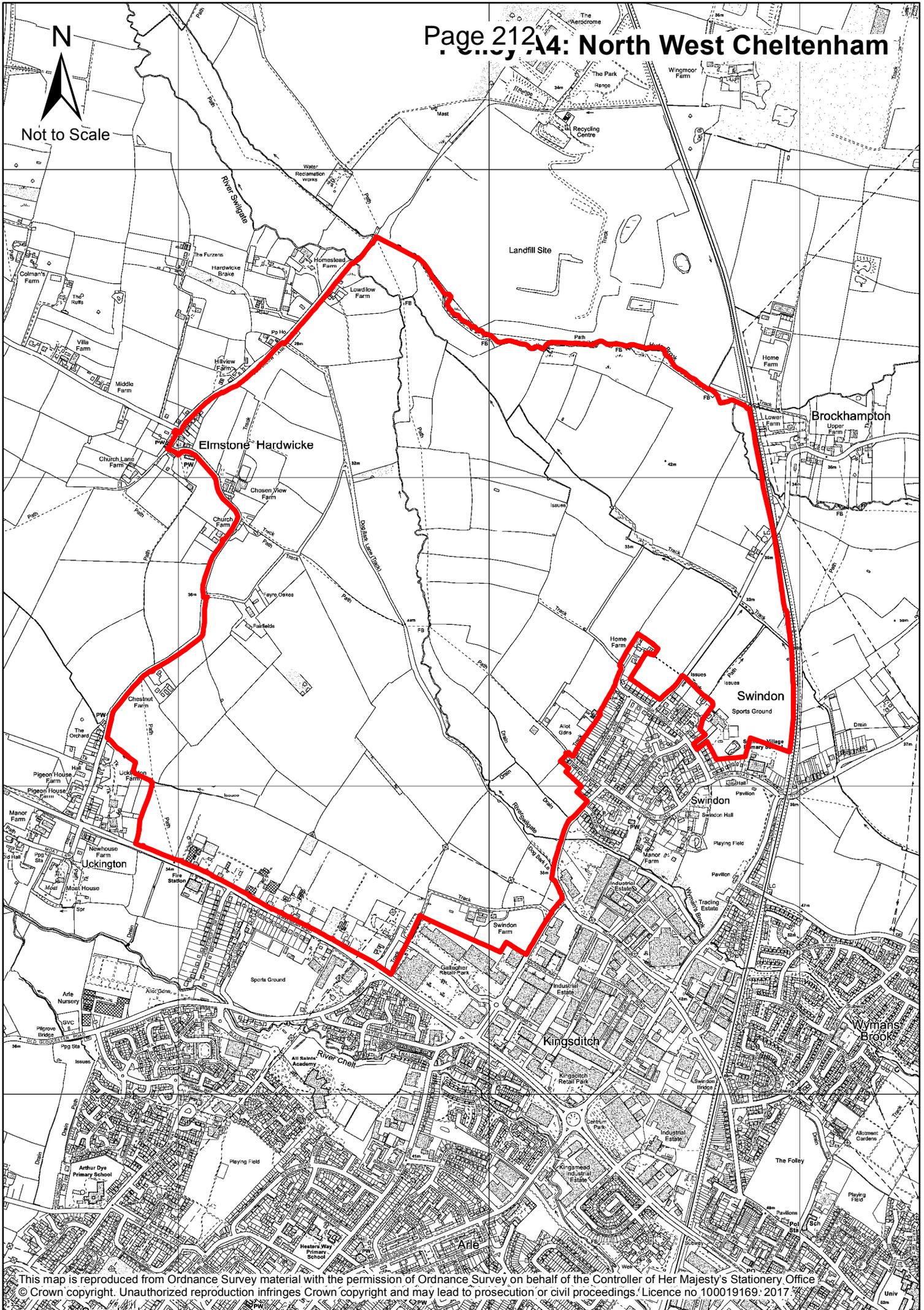
Not to Scale

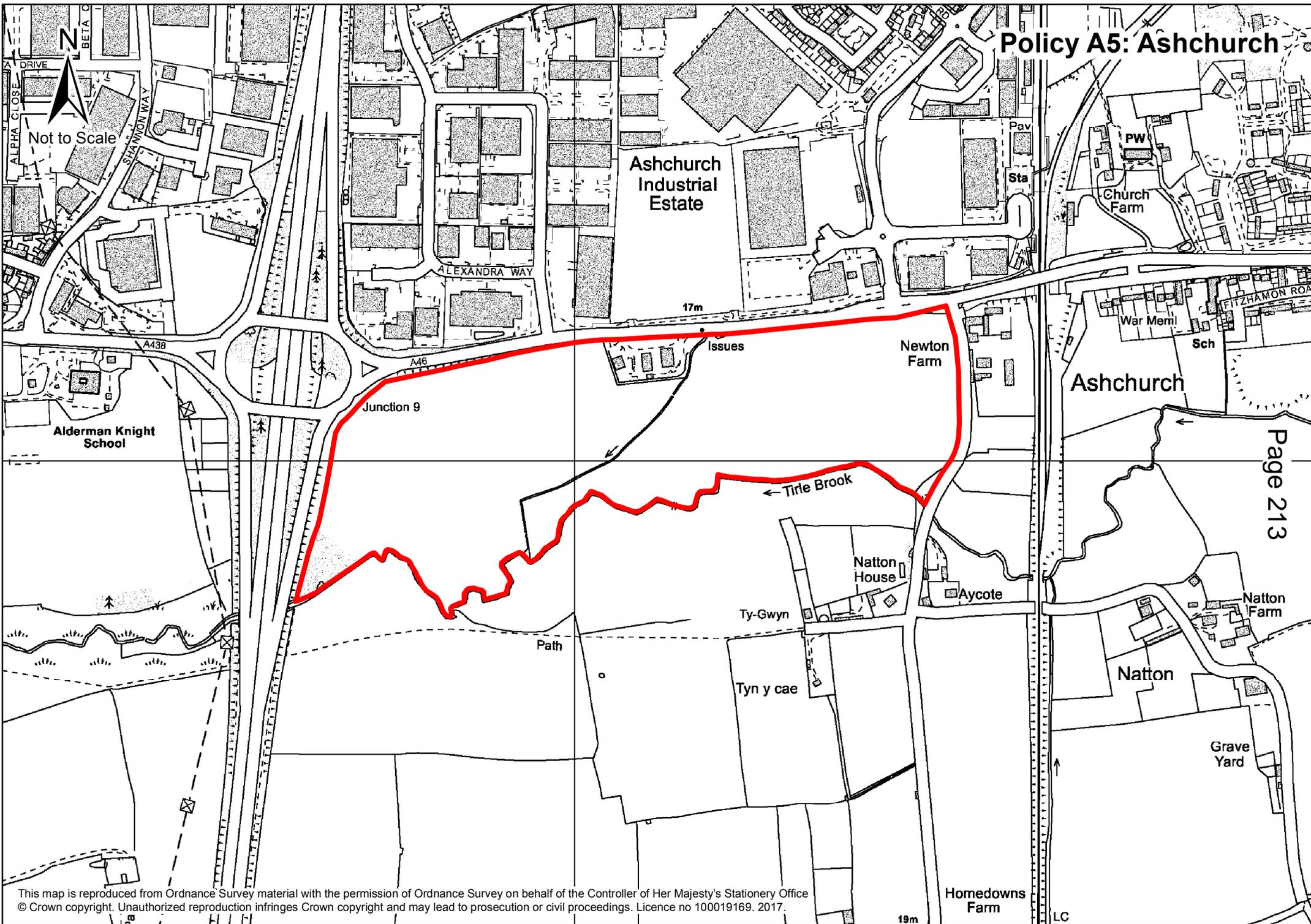


Policy A3: North Brockworth

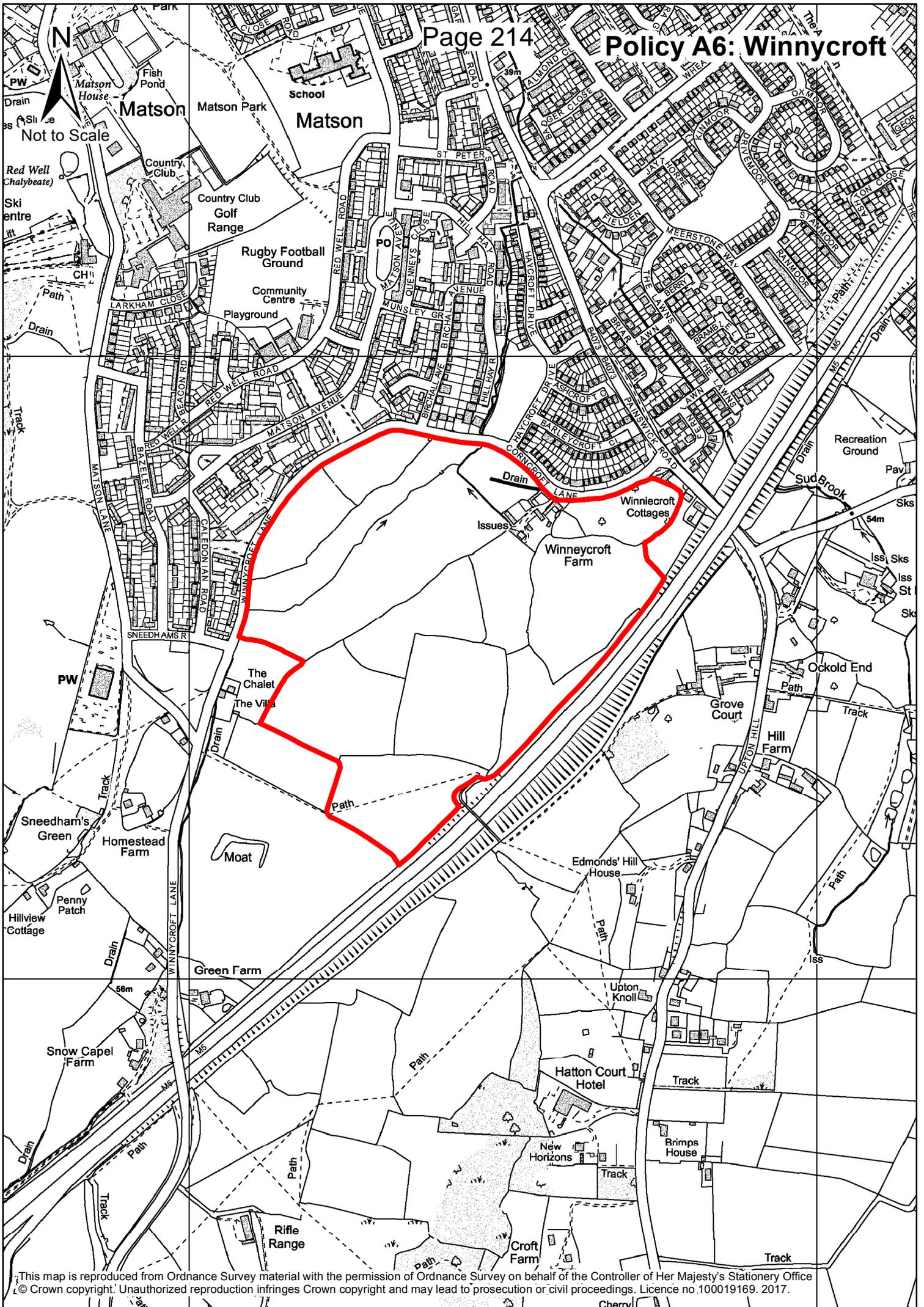


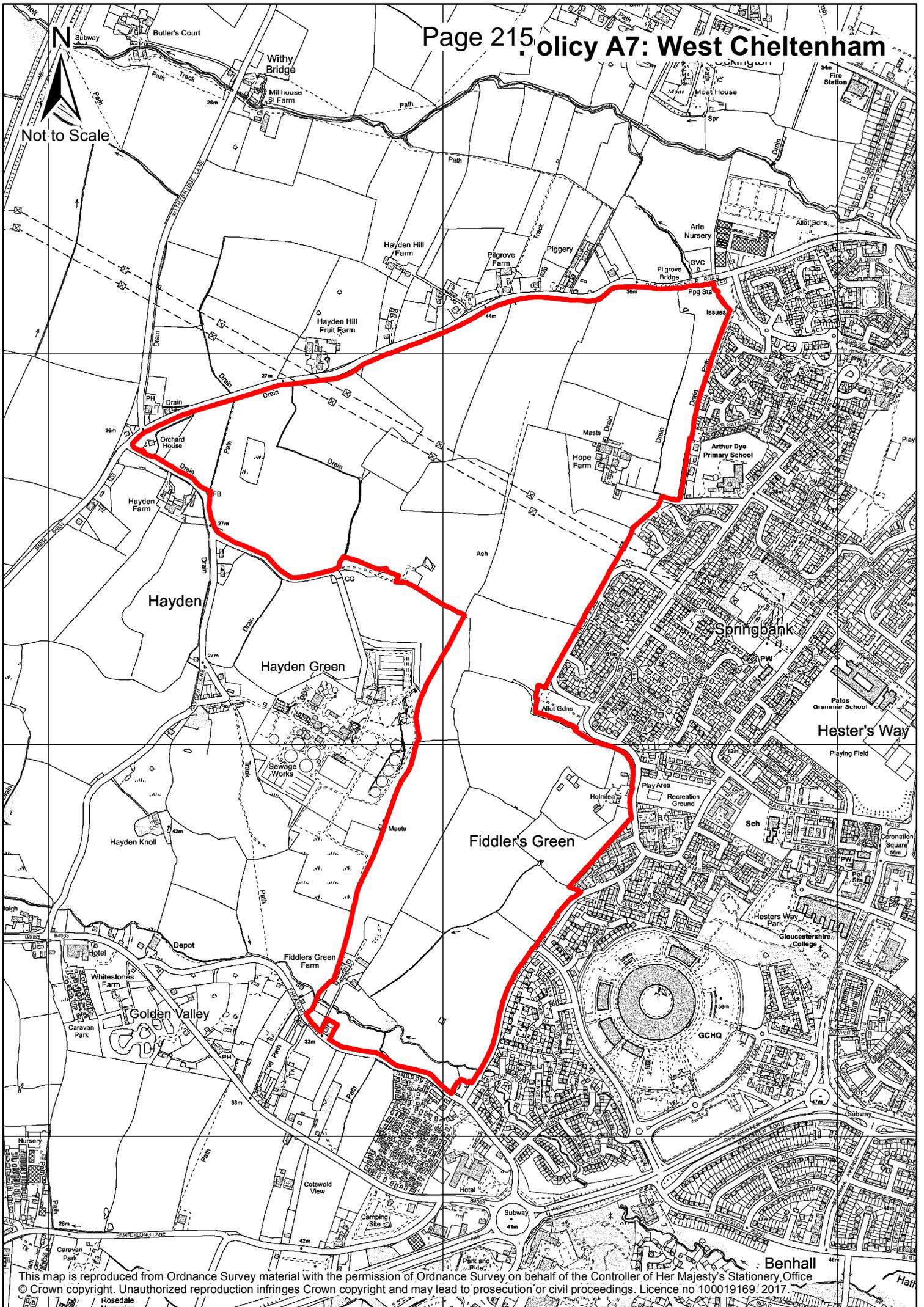
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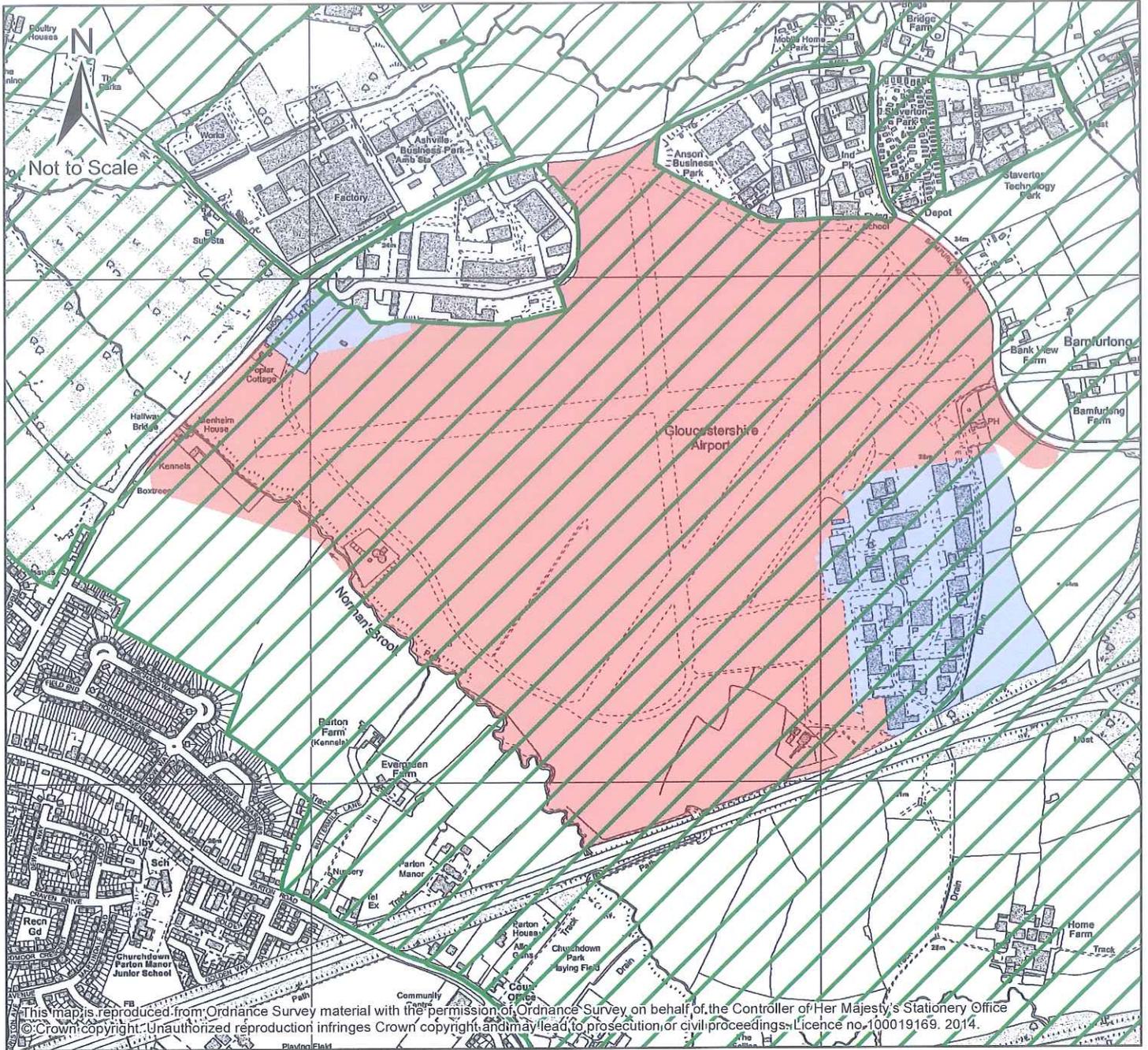




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Key

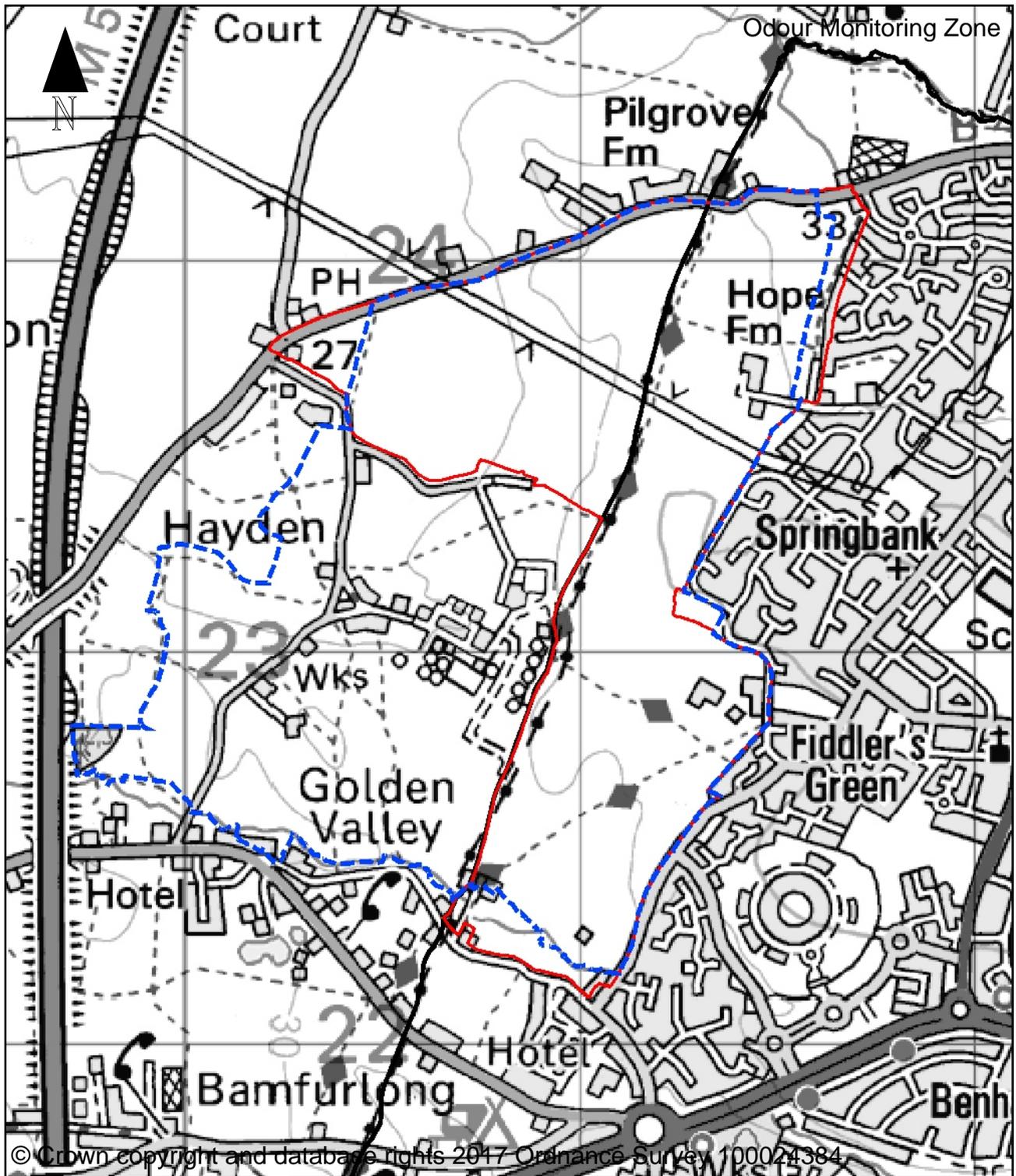
-  Existing Green Belt Boundary
-  Essential Operational Area of Airport
-  Non Essential Operational Area of Airport

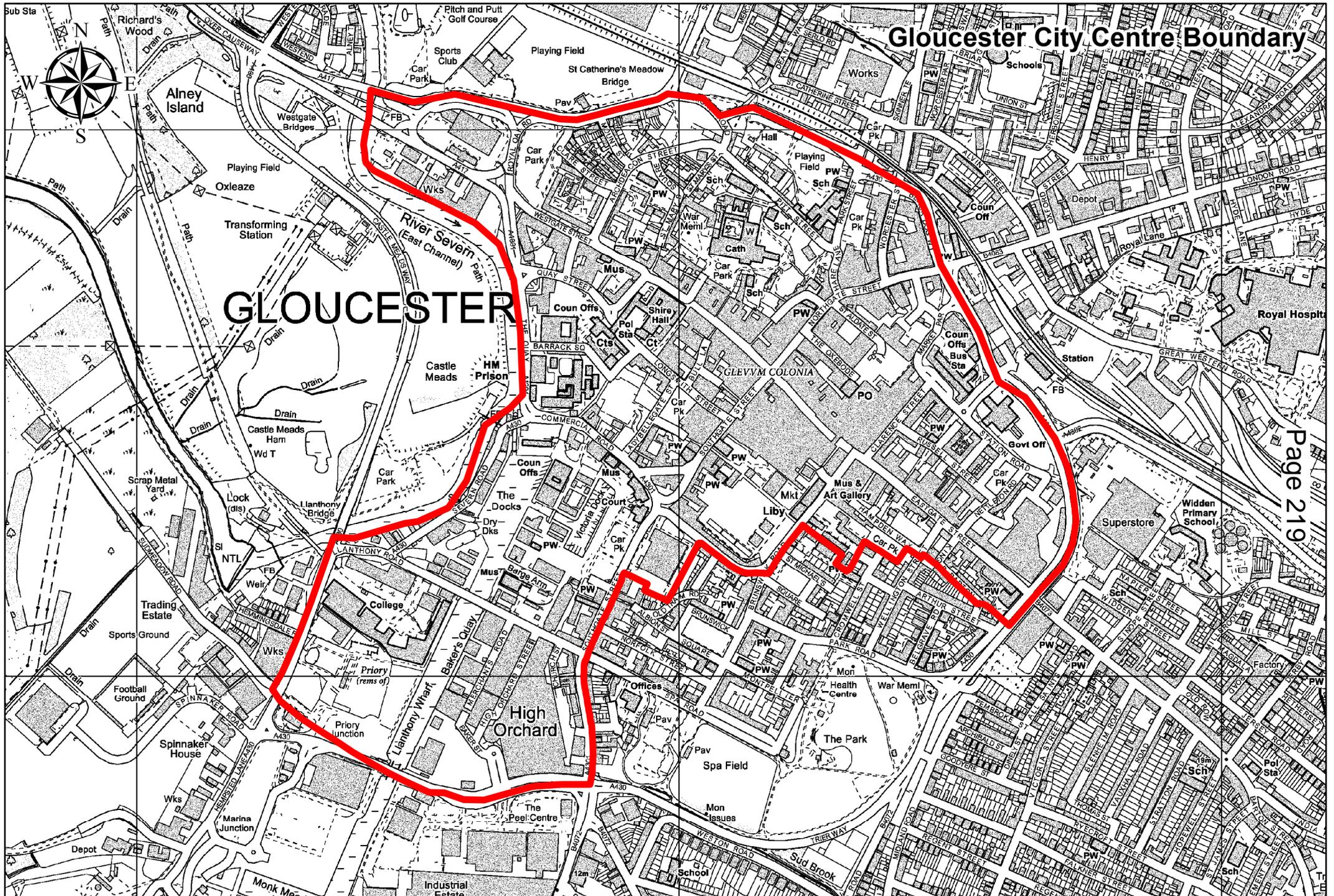


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Key

-  Existing Green Belt Boundary
-  Racecourse Policy Area



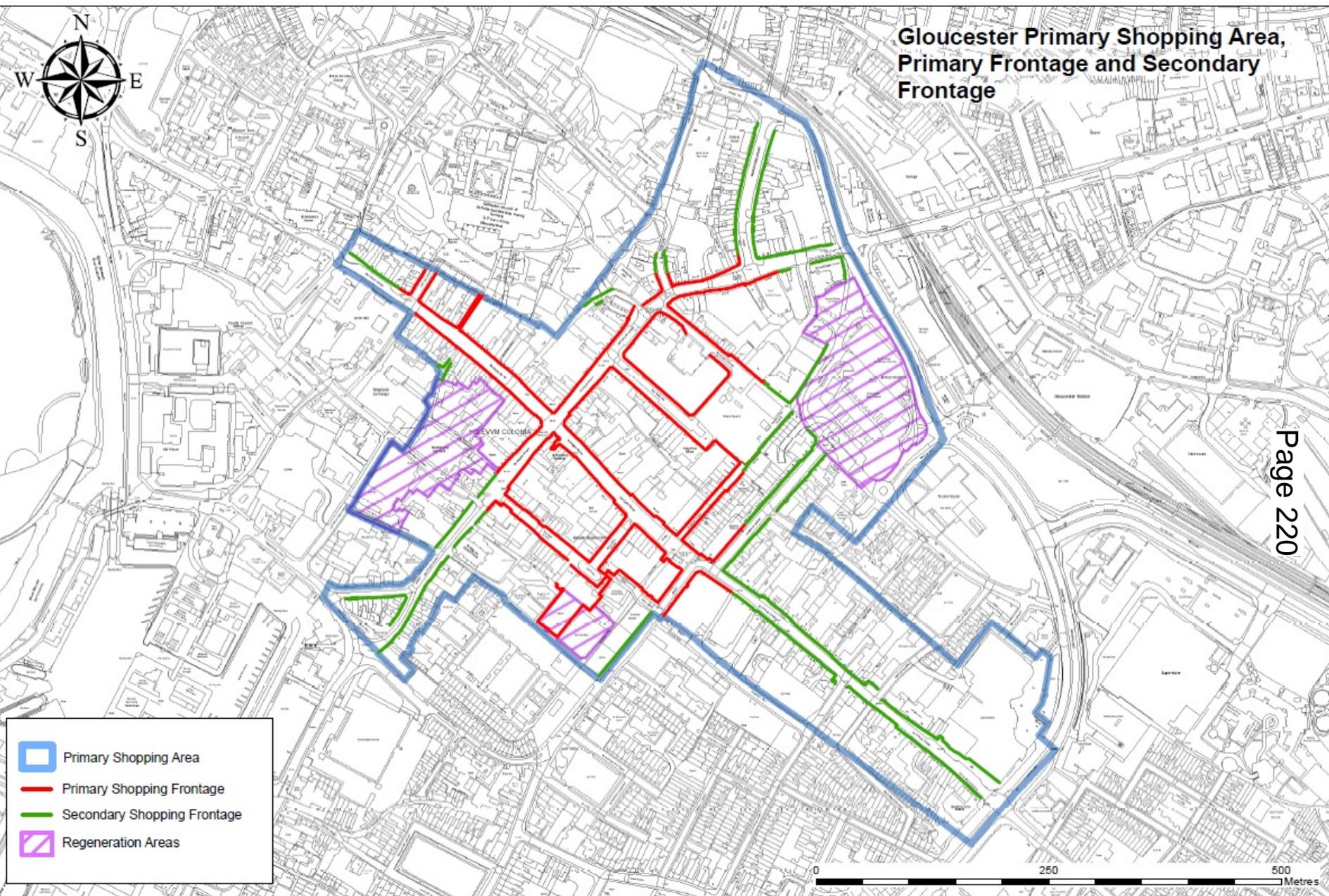


Gloucester City Centre Boundary

GLOUCESTER

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Gloucester Primary Shopping Area, Primary Frontage and Secondary Frontage



-  Primary Shopping Area
-  Primary Shopping Frontage
-  Secondary Shopping Frontage
-  Regeneration Areas

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Report to Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council

by Elizabeth C Ord LLB(Hons) LLM MA DipTUS

an Inspector appointed by the Secretary of State for Communities and Local Government

Date 26 October 2017

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

**REPORT ON THE EXAMINATION INTO THE GLOUCESTER CHELTENHAM AND
TEWKESBURY**

JOINT CORE STRATEGY

Document submitted for examination on 20 November 2014

Examination hearings held between 19 May 2015 and 21 July 2017

File Ref: PINS/B1605/429/4

Abbreviations used in this report

AONB	Area of Outstanding Natural Beauty
CBC	Cheltenham Borough Council
CIL	Community Infrastructure Levy
DCLG	Department for Communities and Local Government
DS7	Do Something 7
GB	Green Belt
GCC	Gloucester City Council
GHMA	Gloucestershire Housing Market Area
GTAA	Gypsy and Traveller Accommodation Assessment
HFR	Household Formation Rate
HIS	Housing Implementation Strategy
JCS	Joint Core Strategy
LEP	GFirst Local Enterprise Partnership
LGS	Local Green Space
LTP	Local Transport Plan
MM	Main Modification
MOD	Ministry of Defence
NMSS	Neil McDonald Strategic Solutions
NPPF	National Planning Policy Framework
OAHN	Objectively Assessed Housing Need
ONS	Office for National Statistics
PPG	Planning Practice Guidance
PPTS	Planning policy for traveller sites
SA	Sustainability Appraisal
SALA	Strategic Assessment of Land Availability
SELAA	Strategic Employment Land Availability Assessments
SFRA	Strategic Flood Risk Assessment
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SIDP	Strategic Infrastructure Delivery Plan
SUE	Strategic Urban Extension
TBC	Tewksbury Borough Council
TIS	Transport Implementation Strategy

Non-Technical Summary

This report concludes that the Gloucester Cheltenham and Tewkesbury Joint Core Strategy (JCS) provides an appropriate basis for the planning of the JCS area up to 2031 providing a number of modifications are made to the Plan. The JCS Councils have specifically requested me to recommend any modifications necessary to enable the Plan to be adopted.

All of the modifications to address this were proposed by the Councils but, where necessary, I have amended the detailed wording. I have recommended their inclusion after considering the representations from other parties on these issues.

The Main Modifications can be summarised as follows:

- Expanding the vision and strategic objectives;
- Clarifying the spatial strategy;
- Stating the role and status of Neighbourhood Plans;
- Restating the housing requirement;
- Inserting housing trajectories and altering the approach to calculating annual requirements;
- Committing to early focused reviews of Gloucester's and Tewkesbury's housing supply;
- Amending affordable housing developer contributions;
- Including a requirement for older people's and students' housing;
- Changing the employment strategy;
- Recalculating retail need and committing to an immediate focused review of retail;
- Recalculating the needs of Gypsies, Travellers and Travelling Show-people and amending the strategy for land supply;
- Amending Green Belt policy and making changes to the sites that are to be removed from the green belt;
- Removing and adding strategic allocations;
- Making changes to sustainable development policies;
- Making changes to infrastructure policies;
- Amending the monitoring framework and inserting review mechanisms;
- and
- Adding a list of superseded policies

Introduction

1. This report contains my assessment of the Gloucester Cheltenham and Tewkesbury Joint Core Strategy (JCS) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and compliant with the legal requirements. Paragraph 182 of the National Planning Policy Framework (NPPF) makes clear that, to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authorities have submitted what they consider to be a sound plan. The basis for my examination is the *Pre-Submission Document* dated June 2014, which is the same as the document published for consultation in June 2014. Whereas the Councils produced a *Submission Version* dated November 2014, this incorporated main modifications of the publication version, which require public consultation. As such consultation had not taken place, the November version could not form the basis of my examination. The Councils also submitted a *List of minor changes to the Submission Version of the JCS*, some of which actually amounted to main modifications that had not undergone public consultation. Therefore, I have dealt with these amendments in the same way as other main modifications.

Main Modifications

3. My report deals with the main modifications that are needed to make the Plan sound and legally compliant and they are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act the Councils requested that I should make any modifications needed to rectify matters that make the Plan unsound and/or not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendix.
4. The main modifications that are necessary for soundness and legal compliance all relate to matters that were discussed at the examination hearings. Following these discussions, the Councils prepared a schedule of proposed main modifications and an integrated sustainability appraisal (SA) addendum dealing with these amendments, which incorporates Strategic Environmental Assessment, Habitats Regulations Assessment and Health and Equality Impact Assessment. Thereafter, the schedule and additional supporting evidence was the subject of public consultation for six weeks.
5. Following this consultation significant updated traffic evidence was published. Given its importance in underpinning the JCS, comments from examination participants were invited over a three week period. Thereafter, a focussed SA addendum was produced specifically dealing with traffic.
6. Due to the extent of the proposed modifications and the additional evidence received since the previous hearing session in July 2016, and taking account of the large numbers of representors who wished to be heard, main modification hearings were held in July 2017.

7. I have taken account of the consultation responses in coming to my conclusions in this report and in this light I have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of these amendments significantly alter the content of the modifications as published for consultation or undermine the participatory processes and SA that has been undertaken.

Policies Map

8. The Councils must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted Development Plan. When submitting a local plan for examination, the Councils are required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as the JCS Proposals Map Submission 2014 as set out in SUB 103b.
9. The policies map is not defined in statute as a Development Plan document and so I do not have the power to recommend main modifications to it. However, a number of the published proposed main modifications to the Plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective.
10. These further changes to the policies map were published for consultation alongside the proposed main modifications under document reference MM02 entitled *Modified and New Maps*. In this report I identify any amendments that are needed to those further changes in the light of the consultation responses.
11. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Councils will need to update the adopted policies map to include all the changes proposed in *Modified and New Maps* and the further changes published alongside the proposed main modifications incorporating any necessary amendments identified in this report.

Assessment of Duty to Co-operate

12. Section s20(5)(c) of the 2004 Act requires me to consider whether the Councils complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan's preparation. Section 33A requires constructive, active and ongoing engagement with neighbouring planning authorities and a variety of prescribed bodies on strategic matters in order to maximise the effectiveness of plan preparation.
13. Details of how the JCS authorities have met their duty to co-operate are set out in their *Duty to Cooperate Statement*. This sets out how the authorities have co-operated between themselves by setting up various levels of governance including a *Cross Boundary Programme Board*, and demonstrates engagement with other authorities and bodies.
14. It shows that regular, meaningful consultation on strategic issues has taken place with relevant bodies including the GFirst Local Enterprise Partnership

(LEP), Highways England, Gloucestershire County Council Highways Authority, the Environment Agency, Natural England, and Historic England. A number of Statements of Co-operation have also been agreed.

15. The JCS authorities have engaged in joint working with other Gloucestershire authorities in preparing a Strategic Housing Market Assessment (SHMA), Gypsy and Traveller Accommodation Assessments (GTAAs), Strategic Flood Risk Assessments (SFRAs) and Strategic Infrastructure Delivery Plans (SIDP).
16. A Memorandum of Understanding has been signed by all Gloucestershire district authorities and Gloucestershire County Council, which sets out how the authorities worked together in preparing their local plans, and deals with cross border, strategic planning applications and strategic infrastructure. A separate Statement of Co-operation has been signed with Stroud district, which addresses the possibility of Stroud contributing to any identified unmet housing needs within the JCS area. Also, in furtherance of cross border relationships, both the Stroud and the South Worcestershire Local Plans make provision for considering the housing needs of the JCS authorities, and potentially assisting with supply, if required. Furthermore, a Planning Statement has been signed with Wychavon District Council in respect of a development at Mitton, to which I refer further below.
17. From the submitted evidence I conclude that the JCS authorities have fulfilled the legal requirements of the duty to co-operate by maximising the effectiveness of the plan-making process and undertaking constructive and active co-operation and engagement on an on-going basis with all relevant bodies and organisations as required by the Local Planning Regulations.

Assessment of Soundness

Preamble

18. The JCS examination has been long and controversial, attracting considerable interest and participation. Since the Plan's submission, substantial additional evidence has been submitted and round table discussions on various topics have taken place in an attempt to address outstanding issues and ensure proper participant consultation. In order to support the proposed main modifications, updated evidence including reports and surveys were published for consultation alongside the schedule of proposed main modifications.
19. Due to the complexity of the issues and the evolving nature of the evidence base, I produced a number of written notes and reports throughout the examination to keep matters on track and to more effectively manage progress. Amongst them were my Preliminary Findings of December 2015, an Interim Report of May 2016, a Note of Recommendations dated 25 July 2016 and a Retail Note of 26 July 2016, all of which I refer to below.

Main Issues

20. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified eleven main issues upon which the soundness of the Plan depends.

Issue 1 – Whether the vision and strategic objectives are sufficiently

comprehensive in addressing the key challenges of the area.

21. The Plan's vision and strategic objectives are based on key challenges within each Council's Sustainable Community Strategy, drawn together to reflect the JCS area as a whole. There are nine objectives, collated under three broad ambitions, incorporating the three dimensions of sustainable development. They have developed from a comprehensive evidence base and have evolved through several stages of consultation and SA, resulting in a positive and distinctive approach that identifies issues of local importance without repeating national policy. However, some gaps need to be filled to ensure the strategies are effective and properly reflect what the Plan is seeking to achieve.
22. In this regard, the wider Tewkesbury Town area, which is proposed for strategic growth, should be identified as a key location for housing and economic development **(MM001a)**, and reference made to the proposed enhancement of Ashchurch for Tewkesbury railway station **(MM001b)**. Furthermore, the intended capacity enhancements from extensive proposed improvements to Cheltenham Spa railway station which, amongst other things, should facilitate access to strategic allocations in the West and North West of Cheltenham, should feature in the vision **(MM001c)**.
23. Gloucester City's regeneration programme should be referenced **(MM001)** and ongoing work at the Kings quarter updated **(MM002)**. Text needs deleting, which no longer supports the new apportionment mechanism for housing **(MM003)**, and the challenges to meeting development needs posed by the flood plain, AONB and Green Belt (GB), should be identified **(MM004)**.
24. Moreover, strategic objective 1 should include the need to increase access to high speed broadband, thereby emphasising its importance for economic growth **(MM005)**. Strategic objective 4 ought to refer to the review of Green Belt within the "Development Plan" rather than the "JCS" to reflect the fact that local changes to the GB might also be made in the forthcoming local plans **(MM006)**. Further to the Written Ministerial Statement of 25 March 2015, strategic objective 6 should not refer to exceeding standards and this needs to be deleted **(MM006)**.
25. Strategic objective 7 requires additional text and rewording to strengthen the ambition to improve opportunities for public and sustainable transport **(MM007)**, and in order to ensure a wide choice of high quality homes, Strategic objective 8 needs to clarify that the Plan's housing provision is a minimum requirement, by adding the words "at least" **(MM007)**. Strategic objective 9 requires additional text to emphasise the role of education, sport, leisure and public transport in promoting healthy communities.
26. Subject to these identified modifications, I am satisfied that the vision and strategic objectives provide balance and a positive framework for the Plan's administrative area.

Conclusion

27. Subject to the identified main modifications, I conclude that the Vision and Strategic Objectives are sufficiently comprehensive in addressing the key challenges of the area. Consequently, I find this part of the Plan to be sound.

Issue 2 – Whether the spatial strategy is the most appropriate for the JCS area.

Overall Approach

28. The JCS authorities intend to follow a two tier approach to land supply with strategic allocations being made in the JCS and local allocations being left to forthcoming District Plans.
29. Part 3 of the Plan sets out the spatial strategy for the JCS area, with Policy SP1 addressing the need for new development and Policy SP2 dealing with its distribution. However, the title of Part 3, being "Strategic Policies", fails to fully reflect its content and could be confusing, particularly as there are other strategic policies within the Plan. Therefore, for reasons of clarity and effectiveness, **MM008** is necessary, which changes the title to "The JCS Spatial Strategy".
30. The overall spatial approach has evolved from a number of spatial options for allocating strategic development land. These were considered in the *Spatial Options Topic Paper* and were subjected to SA, with the most sustainable option being found to be the creation of urban extensions to Cheltenham and Gloucester. In accordance with the evidence base, the spatial strategy focuses new growth mainly on Cheltenham and Gloucester with the aim of retaining their economic and social positions as strategically significant settlements in the sub-region and taking advantage of their existing infrastructure capacity.
31. Tewkesbury Town is constrained by the high risk of flooding from the rivers Severn and Avon, and urban extensions to the Town itself are not proposed. Nonetheless, there are significant parts of the wider Tewkesbury Town area, which appear sustainable and are not so constrained. In recognition of this, the JCS incorporates strategic allocations at Ashchurch on the eastern edge of Tewkesbury Town's wider urban area (although one of these sites is now to be withdrawn for reasons of deliverability¹).
32. The amended employment strategy, which is dealt with at Issue 4 below, concentrates growth along the M5 corridor and junctions 9 and 10. Junction 9 lies close to Tewkesbury Town and its wider built up area and, therefore, this strategy is likely to have direct economic growth consequences for Tewkesbury. Accordingly, the Plan should put greater emphasis on the development potential of the wider Tewkesbury Town urban area to reflect its sustainable location for both housing and its planned employment growth. The detail of how the Plan should be modified to address this is dealt with

¹ See Issue 8 on strategic allocations below

below under Issue 3 (Housing), Issue 4 (Employment) and Issue 8 (Strategic Allocations).

33. Besides the proposed development at Ashchurch, Tewkesbury's growth is focused on a hierarchy of rural service centres and service villages as set out in Table SP2c. However, during the examination, new evidence was submitted in the form of the 2015 *Settlement Audit Refresh* and, as a consequence Stoke Orchard is to be added as a service village. Furthermore, as Twigworth village will now have a strategic allocation adjacent to it, it should be removed from the list. These amendments are achieved by **MMO30**.

Housing Apportionment

34. Gloucester is unable to make any land contribution towards the urban extensions and, therefore, the Gloucester urban extensions consist of land within Tewkesbury district, which lies on the urban edge of Gloucester. Cheltenham makes some contribution towards the urban extensions from land within Cheltenham district. The remainder of the urban extension land lies within Tewkesbury district on the urban edge of Cheltenham. Other strategic allocations lie within the wider Tewkesbury Town area, close to Ashchurch within Tewkesbury district.
35. The JCS was produced on the understanding that each authority would maintain its own five year housing land supply. The JCS Councils intended to apportion supply between the three authorities so that housing on the edge of Cheltenham contributed towards Gloucester's and Tewkesbury's needs, and housing on the edge of Gloucester contributed towards Tewkesbury's needs. However, the proposed methodologies for distributing supply from shared urban extensions as they were built out seemed over-complicated and uncertain, potentially leading to five year housing land supply issues between authorities. None of the methodologies presented appear effective and are, therefore, unjustified.
36. The primary reason for allocating urban extensions around Gloucester and Cheltenham is to meet the unmet needs of Gloucester and Cheltenham where that need arises. The proposed apportionment would not fulfil this aim and, therefore, is unjustified. The most logical and effective way forward is to simply allocate Gloucester's strategic allocations to Gloucester, Cheltenham's to Cheltenham, and those in the wider Tewkesbury Town/Ashchurch area to Tewkesbury. The JCS authorities have accepted this approach, which is reflected in **MMO26**.
37. The redistribution of land supply in this way has had a consequential impact on the amount of land needed around the three main centres of Gloucester, Cheltenham and Tewkesbury. As a result, there is to be some re-balancing towards Gloucester and Tewkesbury, the detail of which is addressed by main

modifications considered below under Issue 3 (Housing), Issue 4 (Employment) and Issue 8 (Strategic Allocations). However, to reflect more general changes to the spatial strategy and to aid clarity, **MM022** and **MM024** are necessary for this part of the Plan to be sound.

Conclusion

38. Subject to the identified main modifications, I conclude that the spatial strategy is the most appropriate for the JCS area. On this basis, I find this part of the Plan to be sound.

Issue 3 – Whether the Plan’s housing requirements are soundly based and whether sufficient provision is made for the supply of housing.

39. The JCS addresses housing supply and demand within Part 3 (Strategic Policies) under Policies SP1 (The Need for New Development) and SP2 (Distribution of New Development) as well as within Part 7 (Monitoring and Review).

Objectively Assessed Housing Need (OAHN)

40. The suggested housing need for the JCS area is set out within Policy SP1. However, the figures are based on outdated evidence and during the examination extensive new evidence was submitted to reflect the up-to-date position. Accordingly, a new assessment was carried out in order to obtain the most appropriate estimate of OAHN, resulting in different figures to the submitted JCS.
41. Assessing housing need is not an exact science and there is no single method of determining an appropriate figure. It is a matter of judgement based on an objective analysis of the submitted evidence. For the JCS authorities, the OAHN has been assessed in a separate document to the Strategic Housing Market Assessment (SHMA), although the two should be read together.
42. The suggested OAHN for the six Gloucestershire districts within the Gloucestershire housing market area (GHMA) is underpinned by two reports from Neil McDonald Strategic Solutions (NMSS). One covers the OAHN for Stroud, Forest of Dean and Cotswold, and the other covers the OAHN for the JCS administrative area. That for the JCS area indicates an OAHN of 30,500 dwellings.
43. Whilst ideally there should be a single OAHN assessment for the entire GHMA, the different timescales of the emerging plans are bound to lead to some divergences, as needs change over time. The starting point is for the JCS authorities and others to identify their own needs within their respective areas drawing upon a proportionate evidence base. An assessment of each authority's own OAHN, coupled with the duty to co-operate on unmet need, provides a satisfactory mechanism for overall co-ordination. In these

circumstances a general consistency of approach is the best that can be achieved and is justified.

44. However, after the publication of these OAHN reports the Department for Communities and Local Government (DCLG) published its 2012-based household projections with updated household formation rates (HFRs). Given that the Planning Practice Guidance (PPG) advises that the most recent projections should form the starting point for estimating OAHN, the OAHN for the JCS area was recalculated. This is consistent with Stroud, who had already done a similar recalculation.
45. Starting with the 2012 Office for National Statistics (ONS) population projections and DCLG's 2012-based household projections, and adjusting to reflect appropriate assumptions and judgements, NMSS re-assessed the OAHN for the GHMA in accordance with the NPPF and PPG. This resulted in a demographic figure for the JCS area of 31,830 dwellings. The overall figure was then segregated into districts resulting in demographic needs of 13,290 dwellings for Gloucester, 9,900 dwellings for Cheltenham and 8,640 dwellings for Tewkesbury. I have found no convincing evidence to reject the workings of NMSS and the resultant demographic figures.
46. Whilst these figures provide a crucial starting point, it is also necessary to consider the impact of economic growth forecasts and aspirations to ensure that there is sufficient housing to support the delivery of job growth. To align the quantity of homes with the Councils' revised economic strategy, I concluded in my Interim Report² that the OAHN should be economically led to accommodate the proposed 39,500 jobs target. This was a shift in strategy from the submitted Plan, whose OAHN was demographically led.
47. Having estimated the population needed at the end of the Plan period (2031) to provide the labour force implied by economic forecasts, the number of dwellings needed was estimated. Given the uncertainties of economic forecasts, a broad-brush approach to assessment is appropriate and, accordingly, it is reasonable to take the average number of required dwellings. With a range between 31,200 and 36,600, this results in an OAHN of 33,500 dwellings, an uplift of 1,670 dwellings on the demographic figure. The OAHN for the JCS area for the Plan period (2011-2031) is therefore 33,500 dwellings and the JCS needs to be modified accordingly for soundness.
48. More recent population projections were published in May 2016 (ONS 2014 sub-national Population Projections) and updated household projections were published in July 2016 (DCLG's 2014-based household projections). NMSS reviewed these statistics and found that they made no difference to the OAHN, due to it being employment led. I accept NMSS's evidence.

² EXAM 232, paragraph 7

49. In terms of apportioning the economic uplift between the three districts, account has been taken of the main economic growth area along the M5 corridor, which runs through the heart of the JCS area. In broad terms, the additional housing is distributed in accordance with the amount of employment land potential in each authority area and with the spatial strategy. This results in economically led OAHNs of 13,675 for Gloucester, 10,395 for Cheltenham and 9,425 for Tewkesbury.
50. To reflect these changes and to justify the strategic approach, amendments are necessary to the supporting text of Part 3, and new Tables SP1a (demographic OAHN) and SP1b (economic uplift OAHN) are inserted (**MM009-
MM012** and **MM014, MM015, MM017**). However, this does not reflect the full housing requirement, which is dealt with below.

Housing Requirement

51. There is a substantial need for affordable housing within the JCS area, but the proportion of affordable housing that is deliverable through market housing schemes, will not meet this need. This is despite the economic uplift, and regardless of whether all strategic allocations and other housing development provide the required contributions of affordable housing (see affordable housing below). Furthermore, it is a real possibility that some strategic allocations will not deliver the affordable housing policy requirement. Although there are other possible sources of affordable housing, as set out in the *Affordable Housing Note*, these numbers are comparatively small and there is no certainty over how much will come forward.
52. The PPG states that an increase in the total housing figure included in a local plan should be considered where it could help deliver the required number of affordable homes. Consequently, to be consistent with sustainable development I consider that a reasonable uplift of 5% is necessary.
53. This would also have other delivery benefits. There are indications that the rate of housing development could result in actual supply falling below planned supply, thereby risking deliverability of the five year housing land supply. As shown in the latest housing trajectories much of the five year housing land supply is expected to come forward from the strategic allocations. However, these allocations have long lead-in times and completions could be delayed, thereby affecting the trajectories' rate of delivery. Increasing supply would give more certainty of delivery and provide choice and flexibility, enabling a positive response to rapid change.
54. I have considered the effect of a 5% uplift in the light of paragraph 14 of the NPPF, and whether the adverse impacts of meeting either the OAHN or the uplift would significantly and demonstrably outweigh the benefits, or whether

specific policies in the NPPF indicate that development should be restricted. In my judgement, whilst there will be adverse environmental impacts from development³, and I go on to consider later in the report whether exceptional circumstances exist to meet some of the housing need on GB land⁴, I have not found sufficient reason to justify a lower housing requirement figure. Whilst this may still leave a shortfall in affordable housing, there is a balance to achieve, and in view of the constraints to development within the JCS area and the limited availability of suitable sites, a greater uplift would be inappropriate.

55. For these reasons, it is necessary for a sound plan to increase the economically-led OAHN figure of 33,500 by 5% (1,675 dwellings), which results in a housing requirement of 35,175 dwellings. In order to boost significantly the supply of housing in accordance with national policy, this requirement should be expressed as a minimum figure. Splitting this 5% uplift between the three districts results in minimum housing requirements of 14,359 dwellings for Gloucester, 10,917 for Cheltenham and 9,899 for Tewkesbury.
56. Accordingly, changes are needed to Policy SP1 (*The Need for New Development*) and its supporting text along with the insertion of Table SP1b, which sets out the requirements. This is achieved by **MM010**, **MM012**, **MM013** and **MM017**.

Strategic Housing Market Assessment (SHMA)

57. The JCS housing provision is underpinned by a SHMA, as updated, covering the six GHMA districts (Gloucester, Cheltenham, Tewksbury, Stroud, Forest of Dean, Cotswold), which seeks to balance the various types of housing need, including affordable housing. However, the originally submitted SHMA was not fully in accordance with the NPPF and PPG and was based on outdated evidence. For example, certain population groups were not adequately considered, such as the institutional needs of the elderly and students, and the affordable housing need assessment took private rented sector supply into account, contrary to the PPG. Consequently, a further SHMA update was prepared during the examination, which re-assessed the scale and mix of various housing types and tenures in accordance with national policy. This new evidence underlines the need for some amendment to the Plan as follows.

Affordable Housing

58. During the course of the examination, the Government, through the Housing and Planning Act 2016, introduced a duty for local authorities to promote the supply of Starter Homes, which will be included in the definition of affordable housing. Whilst this part of the Act has not yet been brought into force, it is likely to be implemented during the Plan period. Therefore, in order to be effective, an amendment is necessary to update the Plan, making general

³ See Issue 8 on strategic allocations

⁴ See Issue 7 on GB

reference to this.

59. The need for affordable housing was reconsidered during the course of the examination and revised figures produced in the further SHMA update. This bases housing cost affordability on up to 35% of gross income. From this, the unconstrained affordable housing need across the JCS is calculated as 638 units per annum. I have found no convincing evidence to reject this figure and its underlying workings.
60. The SHMA then proceeds to reduce this figure by excluding single person households under 35 years who can afford shared accommodation but cannot afford a one bedroomed self-contained unit. This is because the benefits system only provides assistance for single person households under 35 years old to be housed in shared and not self-contained accommodation.
61. There is no basis in the NPPF or PPG for reducing affordable housing need on the basis of the workings of the benefits system. Consequently, in my judgement, the affordable housing need figure should remain at 638 units per annum and the JCS should reflect this figure as a target for affordable housing.
62. The delivery of most affordable housing is intended to be through market housing schemes. However, following the *West Berkshire* Court of Appeal judgement⁵, which upheld the Secretary of State's Written Ministerial Statement of 28 November 2014, the PPG indicates that affordable housing and tariff style contributions should not generally be sought from sites of 10 units or less, which have a maximum combined gross floor space of no more than 1,000sqm. There is no compelling evidence to justify a departure from this. Consequently, for consistency with national policy and guidance, Policy SD13 (*Affordable Housing*) needs to be amended so that sites of 10 residential units or less are not required to contribute affordable housing.
63. Viability is a key factor in considering the quantum of affordable housing that should be generated through market housing development. New viability evidence submitted during the examination demonstrates that viability across the JCS area and between different development types differs significantly. Therefore, to ensure its effectiveness, the JCS needs to be modified to reflect a more flexible approach. This is achieved by setting down varied requirements for affordable housing contributions, taking account of infrastructure challenges and differing land values, amongst other things.
64. For local sites in Cheltenham and Tewkesbury, a minimum contribution of 40% is to be sought, whilst in Gloucester, the minimum contribution is to be 20%. If a development is unable to deliver the full requirement, any reduced contribution will need to be supported by a viability assessment conforming to an agreed methodology. In the interests of transparency, such assessments will in all but exceptional cases be published.
65. It is recognised that strategic allocations present different viability considerations to other sites and each one will have its own deliverability and

⁵ SoS for Communities and Local Government v West Berkshire District Council [2016] EWCA Civ 441

viability challenges. Therefore, balancing the need to provide for infrastructure with affordable housing contributions, the evidence suggests that generally a minimum figure of 35% affordable housing is likely to be viable. Nonetheless, to maintain flexibility, it is necessary to modify the Plan to ensure detailed viability evidence is submitted with each planning application and to determine the appropriate balance between affordable housing and infrastructure needs.

66. In designated rural areas, as described under section 157 of the Housing Act 1985, local planning authorities may choose to set 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 in the form of commuted payments only. There are parts of the JCS area that fall within this rural designation typology and each JCS authority wishes to retain the ability to apply a lower threshold in their own district, where appropriate. This is a justified approach and consequently, in the interests of a clear plan it is necessary for the JCS to reference the ability of District Plans to provide the details of lower thresholds in certain circumstances.
67. In order to ensure that the JCS is sound, main modifications **MM069** to **MM071** to Policy SD13 and its supporting text are therefore necessary. Subject to these modifications the viability evidence leads to my conclusion that the Policy is justified.

Older People's Housing

68. In order to be effective and avoid confusion over five year housing land supply figures, the JCS must be clear on the housing types and numbers that are counted towards the OAHN and those that are institutional and are not. This is particularly important because extra-care housing can sometimes be used as an alternative to care homes, somewhat blurring the distinction.
69. The further SHMA update identifies the need for 1,456 C3 use retirement/sheltered market housing units and 1,011 C2 use extra-care units over the Plan period. For the JCS these form part of the OAHN and are absorbed in the OAHN figures.
70. The further SHMA update also identifies the need for 1,558 non-specified institutional class C2 bed spaces for the Plan period, which would usually be provided in care homes or nursing homes. These bed-spaces are to be provided over and above the OAHN.
71. I understand that many of these bed-spaces will have been permitted by the time the JCS is adopted and provision for the remainder will be made through the District Plans. To be effective and provide a basis for any further development within the District Plans, the JCS should be amended to set out this position. This is achieved by **MM070a**.

Students

72. In order to be competitive, Gloucestershire University requires sufficient accommodation for its students. The further SHMA update indicates that additional growth in student numbers is estimated to result in about 450 new

private dwellings in the private rented sector over the plan period, although this growth has largely been accounted for in the OAHN and, therefore, no additional provision is required. However, over and above the OAHN, the evidence suggests a need for 1,500 bed-spaces in campus accommodation.

73. Planning permission was granted in 2015 for the development of a student village at the Pittville campus in Cheltenham, and Gloucester City and the County Council are currently planning for the Gloucester campus and additional student accommodation. Therefore, I understand that many of the required bed-spaces will have already been permitted by the time the JCS is adopted and provision for the remainder will be made through the District Plans. To be effective and provide a basis for any further development within the District Plans, the JCS should be amended to set out this position. This is achieved by **MM035** and **MM067a**.

Housing types overall

74. Subject to the identified modifications, the JCS policies as a whole appropriately address the need for all types of housing. As a result the Plan is consistent with the NPPF regarding inclusive design and accessible environments.

Housing Land Supply

75. Housing land supply is dealt with in several places within the JCS, namely, the section on delivery within the supporting text of SP1, Policy SP2 on distribution and within the monitoring section. However, there is no Housing Implementation Strategy (HIS) or trajectories contrary to the requirements of paragraph 47 (4th bullet). This was rectified by the submission of a HIS during the examination, which is a living document, a version of which was published for consultation alongside the schedule of proposed main modifications.

Shortfall

76. Whilst the JCS authorities have sought to meet the full housing requirement for the Plan period, it is apparent from the HIS that insufficient sites can be identified at present for Gloucester and Tewkesbury. Overall, against the requirement of 35,175, there is currently a supply of 31,824 dwellings, leaving a shortfall of 3,351. However, there appear to be a number of possibilities for locating additional land and, therefore, focused reviews of Gloucester's and Tewkesbury's supply are proposed.
77. Gloucester's shortfall is 1,346 dwellings although it has sufficient housing land for the short to medium term and this allows adequate time to consider additional development options both within and outside the JCS area. It is therefore intended to explore opportunities within the urban area, as well as potential new Strategic Urban Extensions (SUEs) in Tewkesbury Borough and Stroud District, taking account of the JCS authorities' Memorandum of Agreement with Stroud.

78. Accordingly, there should be an early review of Gloucester's housing land supply to meet its needs in the latter part of the Plan period (see Issue 11 monitoring and review below). This would be in accordance with the *Dacorum* judgement⁶ and guidance in the PPG.
79. Tewkesbury's identified shortfall in its housing requirement is exacerbated by the withdrawal of its main housing land allocation at MOD Ashchurch (2,125 dwellings to 2031) after the Defence Infrastructure Organisation delayed the site's release. This shortfall is approximately 2,400 dwellings.
80. Although parts of the overall site will still be available during the Plan period, including Aston Fields, there are access constraints and issues over how a suitable design could be achieved whilst the army camp remained on site. Consequently, uncertainty over sustainable delivery would make allocation at this stage unsound. Nonetheless, other parts of the land in the control of the Defence Infrastructure Organisation are likely to become available in the future providing a deliverable solution, although timescales are currently unknown.
81. Whilst I previously suggested⁷ that a site at Fiddington might be a possibility for allocation, on the evidence now before me, this would not be justified at present. Nonetheless, it could possibly be allocated in whole or in part in the future. The problem with allocation now is that part of the site has the potential to locate off-line improvements to the A46 corridor, which could address significant traffic flow matters that are constraining growth in the area. Without capacity enhancements to the A46, future development around the Ashchurch area would be limited. Furthermore, there are implications for wider regional highways strategies including Highways England's South Midlands Route Strategy that highlights capacity and safety issues around the M5 Junction 9 and the A46 through Ashchurch. At this stage, given the importance of establishing the most appropriate traffic solution, deliverability and site capacity at Fiddington are uncertain.
82. The JCS authorities have indicated that there are other options in the Tewkesbury town and Ashchurch area which have not been put forward through the JCS process but which are within the Tewkesbury Strategic Assessment of Land Availability (SALA). However, more investigation and evidence gathering needs to be undertaken to establish whether these sites are sustainable options for allocation.
83. Tewkesbury has not had sufficient time to respond to the significant changes to its housing land supply resulting from MOD Ashchurch. Consequently, I consider that, rather than prolonging the JCS examination further, an immediate review of Tewkesbury's supply should take place upon adoption of this Plan to explore additional possibilities (see monitoring and review). This review should be informed by masterplanning of the Ashchurch area, part of which would assess housing delivery options including an access and transport strategy. This review has already started and consultants were commissioned in June 2017.
84. Furthermore, I understand that Tewkesbury Borough Council has submitted a

⁶ Grand Union Investments Ltd. v Dacorum Borough Council [2014] EWHC 1894 (Admin)

⁷ Interim Report EXAM 232 paragraphs 156-159

bid for the Homes and Communities Agency Capacity Fund to support the delivery of growth in this area and unlock housing sites both within and beyond the Plan period. This includes exploring the potential to bring forward land parcels on the MOD Ashchurch site and considering the impacts and opportunities of an off-line A46 route.

85. Outside the JCS area Wychavon District Council has agreed to contribute 500 dwellings to Tewkesbury's supply through a housing-led development at Mitton. Developers are currently preparing an outline planning application, which is scheduled for submission in October 2017.
86. Tewkesbury Borough Council on behalf of the JCS Councils and Wychavon District Council on behalf of the South Worcestershire Councils have signed a Planning Statement setting out the direction of travel for the delivery of this cross-boundary site. It also contains an in principle agreement to develop a more formal Memorandum of Agreement, if deemed necessary. Moreover, as part of any review of the South Worcestershire Development Plan, The Councils will co-operate in considering whether any longer term unmet need in Tewkesbury Borough could reasonably be delivered at Mitton.
87. Whilst development at Mitton may arguably conflict with the Bredon Parish Neighbourhood Plan, which was made on 26 July 2017, this does not necessarily prevent development at Mitton, although it is a material consideration. Having read the submitted legal opinions and in light of Tewkesbury's need for housing, I am not persuaded that the JCS approach or that of Wychavon District Council is unsound or unlawful. It is an appropriate outcome to a duty to co-operate matter.
88. Therefore, taking all considerations into account, I am satisfied that Tewkesbury's housing land supply position is sound subject to immediate review as provided for by **MM123c**. This is in accordance with *Dacorum* and national guidance.

Trajectories and charts

89. In accordance with **MMs124-128**, trajectories and charts will be added to the JCS showing estimated delivery against requirements. Sources of supply are shown to come from strategic allocations and the cross-boundary Mitton site in Wychavon, District Plan potential, commitments, existing allocations (within adopted local plans) and windfall development.
90. I am satisfied that the estimated supply from strategic sites is based on realistic assumptions on lead-in times, and build-out rates and that potential District Plan allocations are supported by robust, up to date SALAs. The windfall allowance is appropriate and reflects past provision, and a suitable lapse rate has been applied to non-allocated, small sites of up to four dwellings, which takes the number of extant, non-implemented permissions in a base year and calculates the number of permissions lapsing over the next five years to get an average.
91. In accordance with the NPPF, paragraph 47 (2nd bullet), the most appropriate buffers have been applied to the five year requirements for each authority,

resulting in 5% for Gloucester, and 20% for Cheltenham and Tewkesbury due their persistent under delivery. These housing land supply buffers have been applied to both the housing requirement and the plan period shortfalls.

92. Although a 20% buffer is appropriate for Tewkesbury at present, Tewkesbury's supply position has recently been improving and, overall, it does not have a shortfall since the start of the Plan period. However, the situation is different for Gloucester and Cheltenham, which have accumulated shortfalls since the start of the Plan period. In accordance with the *Liverpool* approach, these shortfalls have been spread over the remainder of the Plan period. Whilst the PPG favours *Sedgefield*, it supports *Liverpool* in appropriate circumstances. In this case the Councils' reasons for wishing to pursue *Liverpool* are its partial reliance on large strategic allocations, which require the provision of significant infrastructure prior to the completion of dwellings. Using *Liverpool* would allow time for these sites to come forward to help meet the shortfall and deliver on-going annual requirements. In these circumstances, I take the view that the *Liverpool* method is justified.
93. The conventional approach to deriving the annual housing requirement is to divide the total number of dwellings for the Plan period by its number of years' duration to obtain a fixed, average annual figure. However, there is no specific policy or guidance necessitating this methodology. In the interests of ensuring that the future growth of the area can be guided by the Development Plan, the JCS authorities consider that a stepped approach is necessary for Cheltenham Borough.
94. For Cheltenham, as the strategic sites will take time to deliver, providing significant numbers in the mid to latter stages of the Plan, I consider that a stepped approach is justified. Consequently, the housing requirement during the early stages of the Plan has been set at a level that allows the authority to demonstrate a low-risk five year supply from the anticipated adoption of the JCS, increasing to a more ambitious target for the latter half of the Plan period. It is, therefore, recommended that the requirements for Cheltenham Borough be set at 450 dwellings per annum from 2011/12 to 2021/22, with a stepped increase to 663 dwellings per annum from 2022/23 to 2030/31.
95. For Tewkesbury, delivery has been strong over the past four years and as of July 2017 there was an oversupply of 254 dwellings against the annualised housing requirement of 495 for the Plan period. This strong delivery is expected to continue over the coming years until about 2020/21, as committed development is delivered, potentially producing an oversupply in the order of 1,400 dwellings. Cumulatively, on the current evidence, Tewkesbury is able to meet its housing requirements until 2024/25, when delivery is estimated to drop substantially with a shortfall likely to occur in 2025/26.
96. A step down in Tewkesbury's housing requirement from 2024/25 was proposed in the main modifications consulted upon in Spring 2017 in order to

maintain a rolling 5 year supply. However, it is now considered that a review to allocate additional supply will be completed before this date, and Tewkesbury's identified supply would meet requirements until then, rendering a step down unnecessary. This timescale for review is an appropriate response and is preferable to a stepped approach.

Five year supply

97. The anticipated adoption of the Plan is within the 2017/18 monitoring year and, accordingly, the five year supply has been calculated for the period 1 April 2017 to 31 March 2022. Using the methodology set out above, Gloucester can demonstrate at least 5.8 years of housing land supply, Cheltenham 6.00 years and Tewkesbury 5.3 years. However, by the time of adoption, it is estimated that Tewkesbury's supply will have risen to 6.3 years with a 20% buffer applied. Given Tewkesbury's strong delivery record to date during the early Plan period, this buffer could drop to 5% in the future, rendering the 5 years supply even greater.

Main Modifications required

98. On the basis of the updated housing evidence and particularly the HIS, a range of main modifications are required for the Plan to be effective.
99. The section on delivery needs to reflect clearly the contribution of strategic allocations, and local allocations in the forthcoming District Plans. The role and status of Neighbourhood Plans, which are also part of the Development Plan, should be referenced to reflect their potential to identify local sites and policies for future neighbourhood growth. Also, in the interests of positive planning, the JCS should reflect the support the authorities intend to give to the neighbourhood planning process.
100. References to over-supply should be deleted and the table setting out the JCS area's housing requirement needs to be amended. Changes are needed to recognise the contribution Wychavon is making to Tewkesbury's supply and to indicate that each of the JCS authorities is committed to considering the requirements of other authorities both within and outside the GHMA.
101. These amendments are achieved by **MM018** and **MM019**.
102. Policy SP2 (*Distribution of New Development*) and its supporting text also requires substantial alteration. Consequently, it has been re-written to reflect the revised figures and to explain where the supply is now intended to come from.
103. For Gloucester City, it states that the JCS will make provision for at least 14,359 new homes. At least 13,287 dwellings are intended to be brought forward from within the Gloucester City administrative boundary including the Winnycroft strategic allocation, and from the SUEs at Innsworth and

Twigworth, South Churchdown and North Brockworth within Tewkesbury Borough, and sites covered by any Memoranda of Agreement.

104. For Cheltenham it states that the JCS will make provision for at least 10,996 new homes. These are intended to be brought forward from within the Cheltenham Borough administrative boundary and cross-boundary SUEs at North West Cheltenham and West Cheltenham, both of which are partly in Tewkesbury Borough, and commitments covered by any Memoranda of Agreement.
105. For Tewkesbury Borough, outside the SUEs to Gloucester and Cheltenham, the JCS will make provision for 9,899 new homes. At least 7,445 will be provided through existing commitments, development at Tewkesbury Town, Rural Service Centres and Service Villages, and sites covered by any Memoranda of Agreement or similar. It is intended that the Tewkesbury Borough Plan and Neighbourhood Plans will allocate in the order of 1,860 new homes in Rural Service Centres and around 880 new homes in Service villages. However, these numbers are set out as absolutes in the Plan and more flexibility is required to allow for changing circumstances and to ensure effectiveness.
106. The unmet needs of Gloucester and Cheltenham, beyond their administrative boundaries, are only to be delivered on identified strategic allocations and any other sites with an agreed sharing mechanism through a Memorandum of Agreement. In order to allocate any additional SUEs, a review of the Plan would be necessary.
107. It also needs to be clearly stated that local allocations made through the District Plans would have to be in conformity with the JCS spatial strategy and any allocations made through Neighbourhood Plans would have to be in general conformity with the Plan's strategic policies. Reference should also be made to consideration being given to meeting need within another local authority where it is clearly established that need cannot be fully met within the JCS area.
108. Table SP2a (*Distribution of development in the JCS area*) is to be replaced by a new table and retitled "Sources of housing supply in the JCS area". This sets out the figures from the various general sources of supply for each authority, including the contribution from Wychavon District of 500 dwellings to help meet Tewkesbury's requirement.
109. Table SP2b (*Geographical location of strategic allocation sites*) is also replaced by a new table that is retitled "*Apportionment of Strategic Allocation Sites*". This lists the various allocations and the contribution each makes to the housing land supply and, together with figures for the district capacities, indicates the total supply of 31,824 dwellings against the requirement of 35,175.

110. Corresponding changes to the supporting text are also necessary, referencing updated SALAs, reflecting updated trajectories, explaining why the shortfalls in Gloucester and Tewkesbury have come about and how these shortfalls are to be addressed.
111. These amendments are appropriately dealt with by **MMO20**, **MMO21**, **MMO23**, **MMO27**, **MMO28** and **MMO29**.

Conclusion

112. Subject to the identified main modifications, the Plan's housing requirements are soundly based. Although the JCS is unable to provide sufficient, deliverable housing at the current time, it appears that there are credible options for identifying additional supply within the Plan period. Accordingly, by giving a policy commitment to undertake early focused reviews of Gloucester's and Tewkesbury's supplies, this part of the Plan is made sound.

Issue 4 – Whether the Plan is based on a robust, objective assessment of employment needs and provides sufficient opportunities for economic growth.

113. A core principle of the NPPF (within paragraph 17, 3rd bullet) is to proactively drive and support sustainable economic development by identifying and then meeting business needs, whilst responding positively to wider opportunities for growth. However, the submitted Plan did not sufficiently consider economic development needs and how they should be met and, moreover, its economic policies were underpinned by inadequate evidence.
114. Consequently, amendments are required to those policies which address the Plan's economic strategy, namely Strategic Policies SP1 (*The Need for New Development*) and SP2 (*Distribution of New Development*), and also Sustainable Development Policy SD2 (*Employment*), as well as Policy SA1 (*Strategic Allocations Policy*).
115. During the examination extensive new employment evidence was submitted and round table events held to discuss economic issues. This evidence includes past trends, an analysis of supply and demand (including loss of employment land) and the most recent economic forecasts, which were considered against local intelligence on industry growth to provide projected economic trends. As I previously indicated in my Interim Report⁸, this new evidence provides a robust basis for the recommended main modifications discussed below.
116. Of significance is the *Nathaniel Lichfield and Partners Employment Land Assessment Update* of October 2015, which indicates that the current lack of

⁸ EXAM 232 paragraph 29 & 30

employment land within the JCS area threatens the economy by undermining the ability of existing companies to expand and new firms to invest in the area. It therefore concludes that the JCS should target the creation of 39,500 new jobs (in place of the 28,000 new jobs in the Plan) and set a framework for the delivery of a minimum of 192ha of B-class employment land (in place of the 64.2ha of employment land in the Plan).

117. On the basis of the new evidence and in the interests of positive planning the Councils propose an amended economic strategy reflecting the above conclusions which, although aspirational, is nonetheless realistic. This incorporates a vision which promotes a vibrant, competitive economy with increased job opportunities, taking account of the LEP's Strategic Economic Plan and the proposed growth focussed on the M5 corridor and particularly Junctions 9 and 10.
118. Reference is also made to the task force that has been established for evidencing the case for upgrading Junction 10 to an all movements junction, which would support accelerated growth of the area's economy. Aligned to this is the notion of a Principal Urban Area within the County, based around the promotion and regeneration of key urban centres and the balancing of economic potential with housing provision in the JCS area as a whole.
119. The sources of employment land supply are to include a mix of high quality and well-located strategic sites, existing undeveloped available employment sites, and potential smaller sites in the urban and rural areas. Amendments to Strategic Policy SP2 are required to reflect the new strategy.
120. The strategic allocations are expected to deliver at least 84ha of B-class employment land and the District Plans 48ha which, together with existing capacity of 63ha, is intended to give about 195ha of B-class employment land. Together with non B-class employment land, the strategic allocations are now set to deliver in the order of 112ha of employment land and to reflect this, amendment is needed to the strategic allocations chapter and specifically Table SA1, which sets out indicative development capacities.
121. Using information from the SALAs, the JCS *Economic Update Note* of February 2016 assesses the potential additional B-class capacity for each district as 7ha in Gloucester City, 1ha in Cheltenham Borough and 40ha in Tewkesbury Borough. This land is proposed for local employment allocations in the District Plans, which are also intended to provide for start-ups and flexible workspaces.
122. Furthermore, in order to prevent the incremental loss of existing employment land to non-employment uses, it is reasonable for the three districts to wish to evaluate the implications of safeguarding district employment sites. Therefore,

to achieve this it is necessary to modify the JCS to enable District Plans to provide for change of use in certain defined circumstances only.

123. Accordingly, provision should be made within the JCS for setting employment policies in those District Plans. This approach should ensure an adequate supply of employment land and premises and give choice and flexibility to support the intended employment growth.
124. It is not clear from the employment chapter whether it covers retail as an employment type. As the intention is to deal with retail separately, to be effective, its content should be modified to make clear that retail and other "A" class uses are not included. The title to the chapter should also be amended to reflect this.
125. Policy SD2 states that employment related development will be supported at strategic allocations in line with Policy SA1. However, whilst this is generally intended to refer to B class uses (except where non B class uses would support residential and B class development) the Plan does not state this and is, therefore, ineffective and requires amendment.
126. Priority is to be given to key growth sectors and specific local sectors. It is also proposed that support be given to new and existing enterprises and suitable education and training facilities to develop work-place skills. Moreover, employment-generating farm diversification projects, the re-use of rural buildings and appropriate rural new build are to be encouraged. These are justified aims and objectives and, in order to be effective, Policy SD2 needs modification to reflect all of this and to identify the key growth sectors.
127. Cheltenham racecourse, Gloucestershire airport and Gloucestershire university are of significant economic importance to the JCS area and, in order to be sound, more support needs to be given to their development within the Plan. Modifications are recommended to address this in context by setting out the substantial contributions they make to the economy.
128. Despite the importance of tourism to the JCS area, little mention is made of it within the Plan. Therefore, to address this and to provide a supporting framework for appropriate tourist development, modifications are necessary to outline each district's strategies for promoting tourism.
129. Regeneration is a high priority for certain identified urban areas within Gloucester, Cheltenham and Tewkesbury and each of these districts has economic strategies to bring about development in these areas. However, the Plan makes no reference to them, rendering it ineffective in this regard. Consequently amendments are necessary to incorporate references to the relevant strategies, the documents within which they are contained, and the bodies involved, as appropriate, thereby ensuring the Plan's consistency with

these strategies and providing a framework for any regeneration policies that might be included within the forthcoming District Plans.

130. To maximise promotion of the economy, support is to be given to employment related development within other areas. However, not all intended types of location have been identified in the JCS. Consequently, to ensure its effectiveness, amendments are needed to express support for development at the following: allocations within the Development Plan; land in existing employment use; where there is a change of use on an appropriate scale from non-B class to B class; within Gloucester City, the Principal Urban Area of Cheltenham, or Tewkesbury Town; locations within or adjacent to existing employment areas; where it would allow expansion of existing businesses; and where it would support small to medium enterprises.
131. In order to incorporate all of the above into the JCS, amendments are required to Policies SP1, SP2, SD2 and SA1 along with changes to the supporting text and tables. This is achieved by **MM010, MM013, MM016, MM020, MM025, MM032 to MM036, and MM103.**

Conclusion

132. Subject to the identified main modifications, I conclude that the Plan is based on a robust, objective assessment of employment needs and provides sufficient opportunities for economic growth. On this basis, I find this part of the Plan to be sound.

Issue 5 – Whether the retail strategy properly addresses need and supply and complies with national policy.

133. The evidence underpinning Policy SD3 (*Retail*) and its supporting text was updated during the course of the examination with the production of a *JCS Retail Study Update*. This shows that, on a constant market share basis, a substantial unmet comparison goods need will arise for Cheltenham and Gloucester after 2021. Until then, it suggests that both centres will have sufficient supply, with the shortage becoming apparent thereafter.
134. However, with respect to Gloucester, two commitments have been counted in the comparison goods supply for the period up to 2021, which ought to be removed for reasons of deliverability. In considering this I have drawn an analogy with NPPF footnote 11 of paragraph 47, which gives direction on how to assess deliverable housing sites. Footnote 11 advises that, amongst other things, to be deliverable there must be a realistic prospect that housing will be delivered on the site within five years. It also states that sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years.
135. Whilst the commitment at Tesco Extra St. Oswalds has been subject to a technical start, and as a matter of fact has been implemented, the evidence

suggests that minimal work has been done and then only to keep the permission alive. It is common ground that the site is being marketed for sale and, therefore, it is highly unlikely that the scheme will progress. A common sense approach should be taken and, as there is little prospect of the Tesco permission being delivered in practice, it should be discounted.

136. With respect to the other commitment at the Interbrew site, the evidence suggests that Costco (the end user of the retail planning permission) has confirmed to Gloucester City Council that it no longer has an interest in proceeding. Marketing sales particulars and an e-mail from an interested party indicates that the site will be refurbished for existing uses. On this basis it appears highly unlikely that the retail planning permission will be delivered and, therefore, it should be discounted.

137. Subject to adjustments being made for the removal of the sales areas for the two identified commitments, working on a constant market share basis, I accept the figures in the *Retail Study Update* which, in the interests of positive planning, should be expressed in the Plan as minima and not caps. There is, however, an issue over whether the figures should be based on a constant market share basis. Nonetheless, I do not propose to deal with this in my report, as I am recommending an immediate review of retail policy for the reasons given below and it would be more appropriately addressed at that stage.

138. The NPPF at paragraph 23 (sixth bullet) requires suitable sites to be allocated to meet retail needs in full, and there is an identified need during the Plan period which, having discounted the identified commitments from the supply, is immediate. The JCS indicates that supply will be dealt with in the forthcoming District Plans. However, this takes no account of the strategic nature of the sites under consideration, which are for major developments of more than local importance. In accordance with the NPPF, paragraph 156 (second bullet), the JCS should make clear that it covers strategic retail allocations, whilst local allocations are to be left to the District Plans.

139. However, in view of the dearth of site evidence before me, the lack of any SA on retail sites, and the fact that no call for strategic retail sites has been made during the preparation of the JCS, I am not in a position to make strategic retail allocation recommendations. Waiting for this evidence would cause a significant delay to the JCS and would not be in the public interest. Therefore, considering the *Dacorum* judgement⁹, in order to resolve this soundness issue, a policy commitment should be made within the JCS to undertake an immediate review of retail policy.

140. Furthermore, contrary to paragraph 23 (third bullet) of the NPPF, town/city centre boundaries for Gloucester, Cheltenham, and Tewkesbury, which are centres with more than local impact, have not been defined. This is of

⁹ Grand Union Investments Ltd. v Dacorum Borough Council [2014] EWHC 1894 (Admin)

particular concern in relation to Gloucester, which has no extant local plan and, therefore, no existing defined town centre boundary.

141. The emerging Gloucester City Plan has a draft City Centre boundary for Gloucester, a Primary Shopping Area and Primary and Secondary Shopping Frontages and it is proposed that these all be incorporated into the JCS. The Policies map will require corresponding changes to ensure the soundness of this policy. These boundary designations will be included in the immediate review of retail policy, which will consider their justification in the light of forthcoming retail evidence.
142. With respect to Cheltenham and Tewkesbury, insufficient work has been carried out to identify updated town centre and shopping frontages although, there are relevant saved policies in both the existing Cheltenham and Tewkesbury local plans. Consequently, pending an immediate review of designations and their inclusion in the JCS, new retail development will be encouraged in accordance with the saved local plan policies. This should be explicitly set out in Policy SD3.
143. Other amendments to the supporting text of Policy SD3 are proposed to set out structural changes in the retail market due to internet shopping, and to explain regeneration strategies.
144. Modifications **MM037** to **MM043** address all of these matters.

Conclusion

145. Even with the identified main modifications, I conclude that there are shortcomings in the Plan's retail strategy. However, subject to an immediate review of Policy SD3, this strategy can be made sound, and in these circumstances the shortcomings are not fatal to the overall soundness of the Plan.

Issue 6 – Whether the Plan makes sufficient and appropriate provision for Gypsies, Travellers and Travelling Show-people.

146. The JCS identifies a strategic need for Gypsy and Traveller accommodation, based on now superseded national policy, and proposes that much of this be met on strategic housing sites. There has been considerable objection to this and little support. Following the publication of new national policy in *Planning policy for traveller sites (PPTS)*, August 2015, an updated GTAA dated March 2017 was prepared. This demonstrates a reduction in the need for Gypsy and Traveller pitches from 151 pitches to 83, due largely to temporary planning permissions having been made permanent and the evidence-based use of lower HFRs.

147. Taking the re-definition for planning purposes of Gypsies, Travellers and Travelling Showpeople in the PPTS, which excludes non-travelling households, the need for 83 pitches is shown to further reduce over the Plan period. There is a slight increase in the need for Travelling Show-people plots, mainly due to the large numbers of children on site who are likely to form their own households during the Plan period, with the GTAA (March 2017) identifying a need for 30 plots for those who meet the PPTS (2015) definition, and 10 plots for those whose status is not known; of which the GTAA identifies that 70% are likely to meet the definition.
148. The methodology behind this assessment incorporates a full demographic study of all occupied pitches, a comprehensive effort to undertake interviews with Gypsy and Traveller households, and consideration of the implications of the new national policy. I am satisfied that the GTAA provides a robust and credible evidence base and I accept its findings.
149. The previous 2013 GTAA stated that, if transit pitches were considered necessary, a transit site of at least 10 pitches should be provided in Gloucestershire or a temporary toleration policy be established for Gypsies and Travellers moving through the County. Since then, two transit sites have been granted planning permission in Gloucestershire creating 14 transit pitches in total. Consequently, this need has been met. However, the 2017 GTAA presents alternative options to further meet any future need in any event.
150. The evidence now demonstrates that for those Gypsies and Travellers that fall within the PPTS (2015) definition there is a five year land supply. For Travelling Showpeople there is confidence that the five years supply will be further addressed through local allocations in district level plans and windfall sites guided by Policy SD14. Although there is currently an unknown element to the need for both groups, the evidence is that 10% of Gypsy and Traveller and 70% of Travelling Showpeople households are likely to meet the PPTS (2015) definition. As such there is no longer a strategic requirement for Gypsy, Traveller or Travelling Showpeople sites and therefore no need to site pitches or plots at strategic allocations. Further site allocations will be explored through the district level plans. Consequently, to ensure appropriate and effective delivery, modifications to the Plan are recommended removing the requirement for strategic allocations.
151. Section 124 of the Housing and Planning Act 2016 broadens the duty on local authorities to consider the needs of the wider community who reside in caravans or houseboats. This includes people who are no longer classified as Gypsies, Travellers and Travelling Showpeople. Consequently, the JCS authorities should make provision for those people who fall outside the PPTS definition but who have a need to reside in caravans.

152. To address this, such provision, including culturally appropriate accommodation, is to be considered as part of the overall housing mix and will be dealt with through the forthcoming District Plans. This should ensure that needs are planned for in appropriate accommodation in line with DCLG's *Draft guidance to local housing authorities on the periodical review of housing needs: caravans and houseboats* (March 2016). Accordingly, I recommend modifications to Policy SD12 (*Housing Standards*).
153. Furthermore, as part of the mix of affordable housing provision, it is necessary to consider the affordable housing needs of Gypsies, Travellers and Travelling Showpeople. The affordable housing requirement of the travelling community, identified as "public" in the GTAA, will be addressed as part of the overall affordable housing requirement, as set out in Policy SD13 (*Affordable Housing*).
154. According to a *note* produced during the examination, namely *Viability and Impact of Gypsy and Traveller*, there appears to be sufficient headroom for residential sites to contribute to Gypsy and Traveller site provision. Therefore, taking account of the *West Berkshire* Court of Appeal judgement¹⁰ and the Written Ministerial Statement of 28 November 2014, a modification to chapter SD13 is justified for soundness. This would ensure that financial contributions from market housing development towards affordable Gypsy, Traveller and Travelling Showpeople pitches and/or plots are considered, as appropriate.
155. Furthermore, in seeking to maintain supply, existing permanent residential and transit sites are to be protected from alternative use development but do not need to be shown on the policies map.
156. To reflect this updated position and ensure the strategy is effective, modifications **MM072** to **MM077** to Policy SD14 (*Gypsies, Travellers and Travelling Showpeople*) and its supporting text are necessary. A corresponding amendment to the policies map will also be required to ensure the soundness of this policy. Similarly, modifications **MM067** to Policy SD12 (*Housing Mix and Standards*), and **MM0071** to the supporting text of Policy SD13 (*Affordable Housing*) are necessary.

Conclusion

157. Having regard to the public sector equality duty and article 8 of the European Convention of Human Rights, I am satisfied that, subject to the identified main modifications, the Plan makes sufficient and appropriate provision for Gypsies, Travellers and Travelling Show-people. Accordingly, I find this part of the Plan to be sound.

¹⁰ SoS for Communities and Local Government v West Berkshire District Council and Reading Borough Council, 11 May 2016, [2016] EWCA Civ 441

Issue 7 – Whether exceptional circumstances exist for the proposed removal of land from the Green Belt.

158. Policy SD6 (*Green Belt*) sets out the Plan's strategic direction for release of land from the GB, also for development within the GB and for GB protection.
159. The Gloucester/Cheltenham GB is one of the smallest in England and the large areas proposed for removal represent a significant proportion of its entirety. In accordance with paragraph 83 of the NPPF, GB boundaries should only be altered in exceptional circumstances.
160. The main purpose of GB designation between Gloucester and Cheltenham is to prevent the merger of Gloucester and Cheltenham, with other purposes being the prevention of urban sprawl and the preservation of open character. The purpose of a subsequent GB extension north of Cheltenham is to prevent the coalescence of Cheltenham with Bishop's Cleeve.
161. From the submitted evidence, and particularly *The Broad Locations Report*, it is clear that development opportunities are constrained in large parts of the JCS area by significant flood risks and potential impacts on The Cotswolds AONB, amongst other things. Following a sequential approach to sustainable site identification, it is apparent that there is insufficient deliverable/developable, non-GB land within the JCS area to meet its development needs. This is borne out by the Strategic Housing Land Availability Assessments (SHLAAs), Strategic Employment Land Availability Assessments (SELAAs) and SALAs.
162. The possibility of making contributions to the JCS area's housing land supply from cross-border sites in other local authority areas has also been explored under the duty to co-operate. However, apart from about 500 dwellings in Wychavon, no other sites are currently accessible to the JCS authorities. Discussions are continuing with Stroud and Wychavon and options will be assessed as part of the forthcoming housing land supply review for Gloucester and Tewkesbury. Nonetheless, without the use of GB land, there would be no prospect of meeting the housing requirement for the JCS area.
163. Therefore, taking full account of constraints and the outcomes of cross-border exploration, removal of land from the GB is needed, so far as is justified, to contribute to housing provision and the five year supply. In coming to this conclusion, I have considered paragraph 14 of the NPPF. For the GB releases identified below, I find that the adverse impacts of removing land from the GB would not significantly and demonstrably outweigh the benefits of contributing towards housing and other development needs. Nor are there policies within the NPPF that indicate that development on this land should be prevented in principle.

164. The JCS authorities relied on AMEC's 2011 GB assessment in carrying out their review of the GB and selection of strategic allocations. This report is the most up-to-date analysis of the area's GB and considers how strategic segments of the GB perform against the purposes of including land within the GB. I am satisfied that its methodology results in a robust evaluation.
165. I have also taken account of the 2007 AERC Report (covering Cheltenham administrative area only), which I find to be robust in its consideration of local, smaller GB segments.
166. From these reports and other submitted evidence, and for the reasons set out in my Preliminary Findings¹¹, Interim Report, and July 2016 Note of Recommendations, I have drawn the following conclusions.
167. There are exceptional circumstances for GB release at four of the five proposed strategic allocations within the GB. These are Innsworth (plus land at Longford), South Churchdown, Brockworth and North West Cheltenham. However, exceptional circumstances do not exist for GB release at the fifth proposed strategic allocation of North Churchdown¹².
168. North Churchdown would have contributed to Gloucester's housing supply and, as previously indicated, Gloucester is unable to meet its housing requirement for the full Plan period. Nonetheless, there are exceptional circumstances for land to be removed from the GB at Twigworth, which would contribute a greater level of housing supply to Gloucester than North Churchdown. Accordingly, Twigworth is recommended as an additional strategic allocation.
169. Part of identified land at West Cheltenham, which is proposed for GB release as safeguarded land in the Plan, is now recommended as an additional strategic allocation (see below). It is in a sustainable location and its release is justified for development.
170. To be effective, the JCS should state what strategic allocations are within the GB and make clear that the relevant land is to be released from the GB. It does not do this and, therefore, requires modification.
171. As regards potential future development needs, the Plan contains two areas of safeguarded land proposed for GB release at North West Cheltenham and West Cheltenham. This is in accordance with paragraphs 83 and 85 (3rd & 5th bullets) of the NPPF, which seek the endurance of reviewed GB boundaries for the long term beyond the Plan period and, where necessary, the identification of safeguarded land to meet future development needs.

¹¹ See particularly *Inspector's Preliminary Findings on Green Belt Release, Spatial Strategy and Strategic Allocations* (EXAM 146) paragraphs 67-120

¹² Ibid paragraphs 78-81

172. The North West Cheltenham safeguarded land cannot be allocated as a SUE at present for reasons of deliverability largely due to traffic issues, but has potential for future development. The West Cheltenham safeguarded land cannot currently be allocated as a SUE pending relocation of the Hayden Sewage Treatment Works by Severn Trent Water, due largely to odour emission issues. An area of GB around the works is identified in the Cheltenham and Tewkesbury Local Plans as a Development Exclusion Zone. The JCS will replace this designation with an odour monitoring zone where odour modelling will take place to demonstrate where development can occur. This should identify potential areas for future development.
173. Both the North West Cheltenham and West Cheltenham proposed areas of safeguarded land are in sustainable locations, although it should be made clear that any future development is to be well integrated and physically linked to Cheltenham as part of the SUEs. Exceptional circumstances exist for the release of these areas from the GB and their safeguarding is justified.
174. Additional land is recommended to be safeguarded at Twigworth, which is currently not identified within the Plan. This land is in a sustainable location, adjacent to the proposed Twigworth strategic allocation, and together these two areas provide strong and defensible GB boundaries in accordance with paragraph 85 (6th bullet) of the NPPF. Whilst there are currently deliverability issues, this area has the potential to contribute to Gloucester's housing supply later in the Plan period, although the JCS should make clear that development is to be well-integrated and physically linked to the urban area of Gloucester. Exceptional circumstances exist for the release of this land from the GB and its safeguarding is justified.
175. The Plan also identifies other, relatively small, local alterations to the GB boundary. Apart from releases at Shurdington, exceptional circumstances exist for the removal of all of these areas from the GB¹³. Whilst not identified in the Plan, the Policies Map also shows land being released from the GB within the AONB south east of Brockworth. It was agreed at the hearing sessions that exceptional circumstances do not exist for this release. Therefore, it is recommended that the Plan makes clear that this area is retained within the GB and that, to ensure the soundness of the GB strategy, a corresponding change is made to the Policies Map.
176. Two other relatively small areas are proposed for GB release, which are not identified within the Plan. One is located at Grovefield Way in the area of The Reddings where development is being built out. The other is in the area of the Old Gloucester Road and Arle Nurseries, which would provide a more appropriate GB boundary to the north of the West Cheltenham allocation and to the south of the North West Cheltenham allocation. Exceptional circumstances exist for both of these releases.

¹³ Ibid paragraphs 115-120

177. In addition to the extensive review of the GB underpinning the Plan, the JCS authorities wish to have the option of carrying out a limited review of the GB through their forthcoming District Plans. It is reasonable for limited alterations to be made to the GB boundary through the District Plans where this is justified by exceptional circumstances. However, the JCS does not provide the framework for this. Therefore, in order to be effective, SD6 requires modification so that the JCS provides reasonable flexibility to allow this process to take place.
178. The Plan designates Gloucestershire Airport, Cheltenham Racecourse, and waste management sites (allocated in the Gloucestershire Waste Core Strategy) as developed sites within the GB, where co-location of additional development that is essential to the use of these facilities could have wider benefits and, therefore, be justified. However, to provide more flexibility to the waste industry, existing waste management facilities operating in accordance with extant planning permissions should also be included in the designation but do not need to be shown on the policies map. Therefore, in the interests of effectiveness, it is necessary to modify the Plan to reflect this.
179. Also, the wording of Policy SD6 does not reflect the more positive approach to waste management development within the GB that is set out in the Waste Core Strategy. Therefore, in the interests of consistency and to ensure that the Waste Core Strategy is properly considered, SD6 should be modified to state that future waste development on allocated sites in the GB will be in accordance with the Development Plan (which includes the Waste Core Strategy), as well as national policy.
180. With respect to the Racecourse, in recognition of its national standing and importance to the local economy, there should be support for more racecourse related development. The Racecourse Policy Area, within which the JCS provides for appropriate development to take place, is too limited. Therefore, to be effective, the Racecourse Policy Area should be increased and the Policy modified to allow for a new hotel or conferencing facilities.
181. In order to reflect all the above, amendments are required to Policy SD6 and its supporting text. These are addressed by **MM050** to **MM055**. Corresponding changes are also to be made to the Policies Map to ensure the soundness of this Policy.

Conclusion

182. Subject to the main modifications identified, I conclude that exceptional circumstances exist for the proposed removal of land from the GB. Consequently, I find this part of the Plan to be sound.

Issue 8 – Whether the proposed strategic allocations are justified and whether they provide sufficient direction for proposed development.

183. The JCS strategic allocations are set out in Policy SA1 (*Strategic Allocations Policy*). In my Preliminary Findings, Interim Report and Note of Recommendations I addressed both the strategic sites within this Policy and

omission sites in some detail, and for the reasons given in those documents I draw the following conclusions.

184. The strategic allocations of Innsworth (A1), South Churchdown (A3), North Brockworth (A4), North West Cheltenham (A5), and Ashchurch (A9) are sound. However, the allocation at North West Cheltenham should ensure that a green buffer remains around Swindon village within which Local Green Space may be designated, the detailed boundaries of which are to be left to the forthcoming Cheltenham Local Plan. Whilst Ashchurch is allocated for employment uses in the JCS, outline planning permission was granted in March 2016 by the Secretary of State for retail-led development. Therefore, to be effective, modifications are needed to amend the use of this allocation to "employment generating" development, which would include retail.
185. The strategic allocations at North Churchdown (A4) and Leckhampton (A6) are unsound. However, a reduced local allocation could be made at Leckhampton in the forthcoming Cheltenham Local Plan, which should also designate Local Green Space within this area. Whilst I previously commented that an allocation in the order of 200 dwellings at Leckhampton might be reasonable, this was only an approximation and intended to indicate a scale below the strategic threshold for the JCS. The final figures should be based on a full assessment of the area to provide the evidence base to underpin an appropriate allocation.
186. Whereas I previously found the MOD site at Ashchurch (A8) to be sound, due to the Defence Infrastructure Organisation since deciding to retain the majority of the site for at least the next 10 years, the JCS authorities propose removing it from the Plan. I accept that, for reasons of deliverability, its allocation is no longer sound and it is appropriate to remove it.
187. The remaining capacity within the strategic allocations is insufficient to meet the housing and employment requirements for the JCS area. Therefore, the sites of Winnycroft, Twigworth and West Cheltenham are proposed as additional strategic allocations.
188. The majority of the site at Twigworth is located in Flood Zone 1. However, concerns have been raised about flooding, particularly pluvial flooding which present some challenges. Nonetheless, updated flood risk evidence commissioned by the JCS authorities indicates that proposed development of the site would not be unsafe and there are no flooding reasons that should prevent allocation. This was debated by the relevant experts and others at the modification hearings and, having considered all representations on the matter and undertaken visits to Twigworth, I am persuaded that flood risk can be made acceptable by appropriate mitigation measures at application stage.
189. With respect to heritage, although the JCS authorities' consultant has some concerns over the impacts of development at Winnycroft and Twigworth, these issues are not insurmountable and could be addressed at application stage. Consequently, heritage constraints do not prevent the sites being allocated.
190. Winnycroft now has the benefit of outline planning permission for 420 dwellings on part of the site and an application for up to 250 dwellings is being considered on the other part. Consequently, it should contribute to

Gloucester's five year housing land supply. There has been some debate over whether the allocation could be expanded to incorporate adjacent land which is being promoted by developers and would increase supply further. However, there are significant issues on this land that require further detailed assessment before it could be allocated, and it would be unreasonable to delay the JCS any further pending such investigations. Therefore, this additional land cannot be included in the JCS.

191. Since writing my Interim Report, the proposed area for the West Cheltenham strategic allocation has increased, using more of the previously proposed safeguarded land in order to uplift housing numbers from 500 to 1,100 dwellings and to provide a Cyber Business Park adjacent to GCHQ, which will be a dedicated facility of national importance. I am told that the proposed Cyber Business Park has been awarded £22 million of government Growth Deal funding, secured through the LEP and Department for Transport to accelerate its development and underpin highway infrastructure needs.
192. Although there is local concern over this allocation, having undertaken site visits and considered carefully all representations, I am satisfied that appropriate design and mitigation measures can overcome the issues. Furthermore, the increase in housing numbers will assist with the viability of re-locating the Hayden Treatment Works on the safeguarded land, for which Severn Trent Water is exploring options. As indicated previously, this site is in a sustainable location and, given Cheltenham's requirement for additional housing and employment land during the Plan period, its allocation is essential in meeting Cheltenham's development needs.
193. In summary, there are no overriding constraints that would prevent Twigworth, Winnycroft or West Cheltenham being allocated. Therefore, on this basis and for the reasons set out in my Interim Report and Note of Recommendations, I find these proposals to be sound.
194. As a result of these alterations in allocations, the quantity and location of housing and employment land supply has changed and, therefore, to be effective, the Plan needs to reflect this. Consequently, Table SA1, which sets out the housing and employment targets for each site, should be modified accordingly.
195. Policy SA1 and the indicative site layouts do not provide sufficient detail to give clarity to developers, local communities and other interested persons about the nature and scale of development and, therefore, do not conform to NPPF paragraph 157 (fifth bullet) and the PPG. Whilst the intention was to provide a comprehensive master-plan in addition to and separate from the JCS, it is inappropriate to defer important details to an un-examinable document.
196. Therefore, I recommend that, rather than having one general strategic allocations policy, each strategic allocation has its own specific policy setting out the key principles on what it is expected to deliver, along with revised indicative site layouts. An amended Policy SA1 is to remain, giving general direction to developers to ensure sustainable development with comprehensive infrastructure across the site and an appropriate transport strategy to support delivery. A comprehensive masterplan is required for the whole area of each

allocation. Nonetheless, to be effective, and to avoid potential unintended delivery consequences, (such as part of an allocation being stopped from coming forward due to masterplanning on another part being delayed), a modification is necessary to introduce flexibility into the policy.

197. To reflect all of the above, amendments are required to the strategic allocations chapter of the Plan. This is achieved by **MM101** to **MM120**, which also remove remaining references to the former strategic allocation A7 at Up Hatherley Way, South Cheltenham, which was taken out of the Plan at pre-submission stage. Corresponding changes to the Policies Map are also required to ensure the soundness of the policies.

Conclusion

198. Subject to the identified main modifications, I conclude that the proposed strategic allocations are justified and provide sufficient direction for proposed development. I therefore find this part of the Plan to be sound.

Issue 9 – Whether other Sustainable Development Policies are sufficiently comprehensive and justifiable.

199. Part 4 of the Plan contains the Sustainable Development Policies SD1 to SD15, some of which have been dealt with above (SD2, SD3, SD6, SD13 and SD14). Policies SD5 (*Design Requirements*) and SD7 (*Landscape*) are sound as written, the former making sufficient provision for inclusive design and accessible environments in accordance with the NPPF. Issue 9 addresses the remainder of the Sustainable Development Policies (SD1, SD4, SD8 to SD12 and SD15).

Policy SD1 (Presumption in Favour of Sustainable Development)

200. Policy SD1 simply reflects the NPPF. As it is no longer a requirement of Government to include such a policy in local plans, it is proposed to remove it. **MM031** does this.

Policy SD4 (Sustainable Design and Construction)

201. Policy SD4 requires amendments to comply with the Written Ministerial Statement of 25 March 2015 and the PPG relating to technical standards for new dwellings. Accordingly, references to exceeding national standards, zero carbon buildings, the Code for Sustainable Homes, BREEAM, and a 10% target reduction of carbon dioxide emissions from energy demand through on-site renewables, should all be removed. Furthermore, there ought not be any reference to forthcoming District Plans setting requirements in this regard.

202. Also, to ensure compliance with the Waste Hierarchy, National Planning Policy for Waste and the Gloucestershire Waste Core Strategy, the Policy should set out an expectation that all development incorporates the principles of waste reduction and re-use.

203. Pending the designation of Minerals Safeguarding Areas in the forthcoming Minerals Local Plan for Gloucestershire, the JCS should include a requirement

for a minerals assessment where development might sterilise mineral resources. The wording of the existing requirement should be modified in the interests of clarity and effectiveness.

204. **MM044** to **MM049** address these amendments.

Policy SD8 (The Cotswolds Area of Outstanding Natural Beauty)

205. Policy SD8 aims to protect the Cotswolds AONB. However, no mention is made of the potential impact of development "within the setting of" the AONB. Therefore, to ensure its coverage is comprehensive and justified, **MM056** is necessary to make reference to "setting".

Policy SD9 (Historic Environment)

206. Whereas Policy SD9 requires development proposals at strategic allocations to have regard to the *JCS Environment Assessment*, it does not explicitly require potential impacts on heritage assets and mitigation measures to be assessed. Therefore, to ensure it is effective, **MM057** inserts this requirement into Policy SD9.

Policy SD10 (Biodiversity and Geodiversity)

207. The provisions of Policy SD10 do not explicitly extend to preventing unacceptable impacts of development both within and surrounding designated sites. To be effective, this needs to be made clear in the Policy. Furthermore, to comply with paragraph 117 (2nd bullet) of the NPPF, the Policy should identify and map components of the local ecological networks. It is therefore proposed to incorporate the Gloucestershire Nature Map within the Plan to comply with National policy. These amendments are addressed by **MM058** to **MM060**.

Policy SD11 (Residential Development)

208. Policy SD11 guides new housing development to sustainable and accessible locations. However, to be effective it needs to clarify what housing locations it relates to, and amended policy wording is necessary to do this. Also, the reference to the evidence base for carrying out annual assessments of land availability needs to be updated to refer to the SALA rather than the SHLAA.

209. The supporting text in the Plan encourages proposals that bring empty space back into use. The proposed main modifications that were consulted upon in Spring 2017 erroneously removed this text. It has now been re-instated.

210. **MM061** to **MM064** deal with these amendments.

Policy SD12 (Housing Mix and Standards)

211. Policy SD12 is not consistent with the Written Ministerial Statement of 25 March 2015 on technical standards for new dwellings. This changes National policy so that it now requires minimum standards to be dictated by Building Regulations, although local plans have the option of incorporating tighter national standards in respect of access, water and space where there is evidence of local need and where viability is not compromised. The JCS does

not propose incorporating the national optional standards but provision is to be made for the forthcoming District Plans to re-visit this matter, if appropriate. This will allow flexibility when local circumstances are considered further. Accordingly, amendments are required to reflect the updated position.

212. With respect to housing mix, the Plan does not adequately address the needs for all types of housing and the different groups in the community, as set out in paragraphs 50 and 159 of the NPPF. To rectify this, reference should be made to the needs of the disabled, as well as the cultural needs of Gypsies, Travellers and Travelling Showpeople. Also, the reference to the evidence base for the housing mix should include the 2015 SHMA update. Subject to the required amendments, dealt with by **MM065a** to **MM068**, this Policy complies with national policy.

Policy SD15 Health and Environmental Quality

213. A health impact assessment is required by this Policy for proposed development at strategic allocations and other locations at the discretion of the local planning authority. However, to be justified, a more flexible approach is required. Therefore, it is proposed that such assessments be submitted "as appropriate" and that applications which may require health impact assessments be screened in the first instance to determine whether it is necessary for a full assessment to take place. These amendments are dealt with by **MM078** and **MM079**.

Conclusion

214. Subject to the identified main modifications, I conclude that these other Sustainable Development Policies are sound.

Issue 10 – Whether appropriate, evidence-based provisions for delivering suitable infrastructure have been made.

215. Part 5 of the Plan deals with the specific Infrastructure Policies identified as INF1 to INF8.

Policies INF1 (Access to the Transport Network) and INF2 (Safety and Efficiency of the Transport Network)

216. At the start of the examination there was very little transport evidence submitted to support the Plan and, given the extent of outstanding, controversial issues, this was a serious omission. To address this shortcoming, a JCS Transport Evidence Working Group was set up to produce the evidence necessary to underpin the JCS.
217. This Group consists of officers and their appointed consultants from Gloucestershire County Council, Highways England and the JCS authorities. It has now produced a comprehensive *Transport Evidence Base*, which sets out the relevant transport evidence for the JCS area, including an assessment of the strategic allocations and proposed mitigation packages.

218. Over the course of the examination the JCS authorities submitted several transport mitigation scenarios prepared by consultants to demonstrate how potential highway capacity and safety problems could be reduced. Until recently these scenarios were all based on the Central Severn Vale SATURN 2008 base year peak hour models, which were somewhat outdated.
219. An updated 2013 based Central Severn Vale SATURN model was therefore developed, which was validated in March 2017. This was used to test various modelled traffic scenarios to understand the cumulative impact of development including schemes completed since 2013, future committed schemes and the proposed strategic allocations.
220. Although the volume of traffic in the JCS area is set to significantly increase during the Plan period, the evidence suggests that JCS development will only account for a small proportion of this overall traffic growth. The updated modelling scenario *Do Something 7* (DS7) indicates that mitigation strategies could be developed to significantly reduce the cumulative impact of the growth envisaged by the JCS including the traffic impact of the strategic allocations.
221. These strategies are set out in the JCS authorities' Transport Implementation Strategy (TIS), which is a living document that sits alongside the JCS. It concludes that the DS7 scenario represents an effective and viable transport strategy to support delivery of the JCS. It demonstrates how additional trips from JCS development can be accommodated on the network, whilst ensuring the transport network is able to adequately function. This has involved balancing affordability, new infrastructure and travel choices with a key element being the greater use of alternatives to the car.
222. The TIS complements Gloucestershire County Council's *Local Transport Plan 2015-2031* (LTP), which is the key document for dealing with local transport network strategies in Gloucestershire. In order for the JCS to be effective, it should be in general conformity with the LTP. However, the LTP is a living document, which is updated and amended to reflect changing circumstances, and the JCS authorities have liaised closely with the County Council to minimise any discrepancies between the two documents. The LTP has already been reviewed to take account of the JCS and could respond further if appropriate.
223. SATURN does have limitations in that it is a strategic model and the DS7 proposals are high level. Furthermore, DS7 does not resolve all congestion issues across the JCS area. Nonetheless, more focussed modelling and mitigation design to deal with allocated development issues can be left to application stage.
224. Highways England are content that, from a strategic road network perspective, the JCS is sound and residual issues are not fundamental. Gloucestershire County Council, the local highways authority, is satisfied that the proposed planned growth in the JCS area can be safely accommodated on the local highway network without a cumulative severe impact, and that residual issues are not fundamental to the safe and efficient operation of the local transport network. Both indicate that residual issues are capable of resolution and can be dealt with through further detailed assessment and mitigation as sites come forward. I give considerable weight to the opinions of these bodies.

225. Also, a high level air quality study has provided a strategic overview of the potential air quality impacts that could result from the greater vehicle flows attributed to the scale of planned growth. This tests the DS7 scenario to 2031 and includes an assessment of potential cumulative impacts of the increased traffic on strategic travel corridors. In producing this document, the *Wealdon judgement*¹⁴ has been taken into account, which dealt with the approach to assessment of in-combination effects of vehicle emissions on protected habitats. Whilst more detailed air quality assessments will be required by Policy SD4 at application stage, this high level study does show that there would be no significant air quality issues that would prevent the SUEs being allocated.
226. I am now satisfied that the submitted evidence properly supports the JCS and that the TIS sufficiently resolves transport issues for allocation of the identified strategic sites to proceed.
227. The thrust of Policies INF 1 and 2 is to ensure that any traffic congestion that is likely to arise from development is mitigated to ensure that the highway can operate safely within its design capacity. However, having two policies gives rise to some duplication, which is unjustified. Therefore, modifications are necessary to amalgamate these provisions into one policy and to re-name it INF1 (Transport Network). Consequently, significant changes are required to the Policy wording to provide the required streamlining.
228. Furthermore, to ensure consistency with national policy, additional text is necessary to promote non-car use by ensuring that opportunities are taken for enhancing walking, cycling and public transport networks. The need for Transport Assessments has also been added to include cumulative impacts, and amendments made to allow for travel plans to be requested where appropriate.
229. Other changes to the supporting text are necessary to update the transport position and aid clarity. These include making the link with the TIS, Policy SA1 (*Strategic allocations*), and Policy SD5 (*Design Requirements*) with regard to masterplanning, design and layout when considering sustainable travel modes, providing further explanation of travel plans and the LTP, and directing developers to an infrastructure guide.
230. All these modifications are satisfactorily achieved by **MM080** to **MM083**.

INF3 (Flood Risk Management)

231. Flooding is a significant issue in the JCS area, which covers parts of the Severn and Avon rivers and a large number of smaller watercourses. Accordingly, the JCS is supported by Level 1 and Level 2 SFRAs, the latter of which includes site assessments for all sources of flood risk in the area (fluvial, pluvial, tidal, sewers and artificial sources) for sites with a proportion of land in Flood Zones 2 and/or 3. Appropriate methods are also discussed for reducing flood risk on site and sustainable drainage techniques, although the suitability of a particular development is left to a site specific Flood Risk Assessment at the application stage.

¹⁴ *Wealdon District Council v Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority* [EWHC 351] March 2017

232. The Level 2 SFRA demonstrates that for all but one of the sites (Twigworth) development on site can be located away from flood risk and designed to be safe from flood risk. For the remaining site, Twigworth, further detailed evidence indicates that, despite a greater flood risk in part of the site, there are no overriding flooding issues which would prevent its allocation for development. I consider all of this evidence to be robust and convincing and I accept its conclusions.
233. The JCS directs built development towards areas of low flood risk in accordance with the sequential test. However, to be effective, Policy INF3 and its supporting text should be amended to ensure that development in flood risk areas is subjected to a Flood Risk Assessment which, amongst other things, incorporates the latest available updates to modelling, so that the most up-to-date flood risk information is available to decision takers.
234. Although the evidence does not take full account of recent climate change guidance suggesting a new 70% fluvial allowance in place of the previous 20% allowance, the Environment Agency are satisfied that this could be dealt with at the planning application stage. Consequently, they have no soundness objections to the Plan.
235. Sustainable drainage schemes should also be properly considered at application stage and, to ensure consistency with national policy, the Plan's supporting text should direct developers to guidance from the Lead Local Flood Authority. For similar reasons, explanatory text requiring consideration of cumulative effects and the demonstration of deliverable flood risk management solutions is also required.
236. Finally, and more specifically, to ensure the effectiveness of ongoing flood defence work in Gloucester City, an amendment is proposed to refer to the co-ordinated approach that is required to development, particularly at key regeneration sites to realise wider flood benefits.
237. All these amendments are satisfactorily achieved by **MM084** to **MM087**.

INF4 (Green Infrastructure)

238. 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, namely The Cotswolds AONB and the River Severn and its washlands. The River Severn area is being promoted as a Regional Park in recognition particularly of its special habitat qualities and its importance to the quiet enjoyment of the countryside. It is therefore necessary for the effectiveness of Policy INF4 that a change be made to its supporting text to make reference to the potential Regional Park.
239. Also, for reasons of effectiveness, the Policy should recognise that the growth proposed by the JCS will increase demands on green spaces and that this will require careful management and collaborative working with key stakeholders. Accordingly, an amendment is needed to insert additional supporting text to reflect this.
240. Furthermore, it is recommended that the North West Cheltenham SUE retains

a green buffer around Swindon Village. An amendment to the strategic allocations chapter of the Plan is necessary to reflect this, as mentioned under Issue 8. Reference to this green buffer and its intended allocation as Local Green Space in the forthcoming Cheltenham Local Plan should also be made in the supporting text of INF4 for reasons of effectiveness.

241. These changes are all properly dealt with by **MM088** and **MM089**.

INF5 (Social and Community Infrastructure)

242. INF5 makes provision for social and community infrastructure associated with proposed development. As its delivery will be influenced by existing social sustainability initiatives that the JCS and District Plans intend to take forwards, to be effective, reference to these initiatives should be made in the supporting text. Accordingly, **MM090** is necessary to reflect this.

INF6 (Renewable Energy and Low Carbon Energy Development)

243. Policy INF6 is a criteria based policy that supports appropriate renewable and low carbon energy development including wind turbines. However, the Written Ministerial Statement of 18 June 2015 indicates that planning permission should only be given to wind energy development where the site is identified in the Development Plan, amongst other things. The JCS authorities intend to address any such allocations through their District Plans. Consequently, to conform to national policy, INF6 requires amendment to remove wind turbines from its remit and to refer to potential allocations being made at district level.

244. The Policy's supporting text also refers to 10% on site renewable energy generation for new development. However, as referred to above for Policy SD4 in Issue 9, for consistency with the Written Ministerial Statement of 25 March 2015 and the PPG relating to technical standards for new dwellings, references to exceeding national standards should be removed.

245. These amendments are satisfactorily dealt with by **MM091**, **MM093** and **MM094**.

INF7 (Infrastructure Delivery)

246. The JCS does not make clear at least for the next five years what infrastructure is required to deliver the planned development as envisaged in the PPG. Furthermore, the SIDP identifies a funding gap of nearly £750 million during the Plan period with little indication being given of how it is intended to be met.

247. However, detailed, robust evidence from Ove ARUP, submitted during the examination for all the proposed allocations and the cross-border site at Mitton, adequately identifies priority infrastructure for at least the next five years and how it will be provided. This is reflected in the main modifications to the strategic allocations chapter in Part 6 of the Plan which, as amended, sets out satisfactorily the requirements for each allocated site.

248. New analysis of the funding gap by Ove ARUP demonstrates that the SIDP estimated costs at a high level and is an optimistic snapshot in time. When

the funding is broken down, the report says that the funding gap reduces to about £73 million for critical infrastructure, with the majority of projects and costs being within the “desirable” category. Moreover, it indicates that projects and associated costs have changed as time has progressed and schemes have evolved. The analysis shows that at least for the first five years, most infrastructure requirements are likely to be met by developers through planning obligations.

249. The evidence indicates that for most infrastructure a fully funded package of deliverable solutions has been agreed between service providers and promoters for at least the first five years of projected completions. Nonetheless, there is some uncertainty over certain critical infrastructure over the Plan period, due to a lack of information or discussions still ongoing between parties. However, I accept that infrastructure planning is an iterative process and there will be opportunities to address any outstanding issues as schemes advance. Whilst there is an expectation that issues will be resolved in the detailed master planning of sites, strategies are in place to minimise risks to delivery to an acceptable level. I find the Ove ARUP work to be robust and convincing and I accept its conclusions.
250. Some longer term transport schemes will depend on other sources of funding as identified in the TIS. Monies have also been secured for Gloucestershire through the third round of the government’s Growth Deal in the sum of £29.13 million (with £26.5 million covering the JCS area), part of which will be used to ease traffic flow. Further investment is possible for motorway improvements through the Road Investment Strategy. Bidding for additional funding is ongoing.
251. On the basis of this evidence I am satisfied that there are reasonable prospects of at least the identified critical infrastructure coming forward over the first five years from adoption of the Plan.
252. To ensure that INF7 is in accordance with national policy in seeking to secure the delivery of appropriate and proportionate infrastructure, it should take account of the *National Infrastructure Delivery Plan 2016-2021*. To do this, a change should be made to its supporting text to reference and reflect this plan. Also, to ensure its effectiveness, amendments are necessary to clarify that development of all scales and types is covered, and to signpost developers to Gloucestershire County Council’s *Local Developer Guide* for advice.
253. Furthermore, to be justified, alterations to the Policy are necessary to clarify that infrastructure will only be required that is necessary, directly related, and fairly and reasonably related to the scale and kind of development proposed. Amendments to the list of types of infrastructure that might be needed is also necessary in the interests of effectiveness.
254. These amendments are satisfactorily achieved by **MM095** to **MM098**.
- INF8 (Developer Contributions)*
255. Policy INF8 provides for developers to make direct arrangements for implementing infrastructure requirements or to make financial contributions. To ensure its effectiveness, the Policy should be modified to make clear that

financial contributions will be sought through section 106 of the Town and Country Planning Act 1990 and the Community Infrastructure Levy (CIL) under the Planning Act 2008.

256. Similarly, for non-policy compliant schemes, it is proposed that viability assessments be submitted which, if necessary, the JCS authorities will have independently appraised at the applicant's expense. Such assessments will usually be published in the interests of transparency.

257. These amendments are properly dealt with by **MM099** to **MM100**.

Conclusion on infrastructure

258. Subject to the identified modifications, I conclude that appropriate, evidence-based provisions for delivering suitable infrastructure have been made, and that this part of the Plan is sound.

Issue 11 – Whether the provisions for implementation, monitoring, review and ongoing co-operation are satisfactory.

Monitoring Framework

259. Part 7 of the Plan addresses the monitoring and review of JCS policies to assess the effectiveness of their implementation and delivery. It contains a monitoring framework with targets and monitoring indicators that are to be reviewed periodically. In general, this is a comprehensive tool although, to be effective, it requires amendment to reflect the modifications to the JCS and to remove indicators for which data sources are no longer available or are more appropriate for monitoring at District Plan level.

260. Furthermore, the supporting text requires amendment to demonstrate how the Plan is able to be flexible and responsive to change in accordance with national policy. It is therefore recommended that, if monitoring indicates that delivery problems are emerging or that circumstances are changing in other ways, the JCS authorities will consider implementing certain measures to bring forward development. These include the early release of safeguarded land, particularly if improvements to Junction 10 are forthcoming, and cross-boundary working with Stroud and Wychavon District Councils that might allow for further housing land supply. Also, to be effective, it needs to be clarified that monitoring outcomes will be reported through a single JCS Authority Monitoring Report.

261. All of these amendments are satisfactorily dealt with by **MM122** and **MM129** to **MM133**.

Housing Implementation Strategy and Trajectories

262. Amendments are necessary to refer to and set out information from the HIS in order to ensure that the Plan is clear and therefore effective. This includes explanations of what the JCS authorities intend to do should there be any barriers to delivering the development proposed by Policies SP1 and SP2 and how to respond to changing circumstances. There are calculations of the five

year supplies for each authority and charts and trajectories for market and affordable housing illustrating estimated delivery against requirements together with accompanying explanations. The expected delivery from each of the strategic allocations and Mitton in Wychavon is also set out in table format and contingencies put in place to respond to any significant under-delivery.

263. These changes are addressed by **MM121** and **MM124** to **MM128**.

Reviews

264. In order to ensure flexibility and effectiveness, the Plan needs amendment to include a housing supply review mechanism with a trigger for full or partial review. Solely for monitoring purposes, a 10% buffer is to be applied to the housing requirement of each JCS authority on an annual basis. If completions fall below 110% of an authority's supply trajectory then this acts as an early warning for the authorities to review and take corrective action. If strategic allocations cumulatively delivered less than 75% of their projected completions over three consecutive years, this would trigger the need to consider a partial or full JCS review. In this way the authorities would get early warning of a potential imminent housing shortfall so that corrective action could be taken.

265. Moreover, the six Gloucestershire district councils have been jointly working on a Gloucestershire devolution bid seeking to better align services and resources to jointly grow the economy. A Statement of Intent has been submitted to DCLG although it may be some time before it is taken forward in light of other government priorities. The Plan is intended to be reviewed within five years in accordance with the PPG and it is the wish of the JCS authorities that any full or partial review is aligned with those of other Gloucestershire authorities. This is reasonable. Therefore, amendments are necessary to reflect this in the interests of effectiveness.

266. The above changes are addressed in **MM123**.

267. As referred to above, in response to shortfalls in the Plan's provisions, a number of focussed reviews to the JCS will be necessary¹⁵. This accords with PPG guidance. Without these reviews the JCS would be unjustified and, therefore, unsound.

268. As Gloucester is unable to meet its housing requirement for the full Plan period, there should be an immediate review of Gloucester's housing supply following adoption of the JCS. This would allow consideration of options that become available both within and outside the JCS area and could include further development opportunities that are not currently deliverable.

269. The JCS authorities' Statement of Co-operation with Stroud District provides a tool for exploring the possibility of housing land supply in Stroud contributing to the JCS authorities' needs, where it is reasonable to do so and consistent with achieving sustainable development. Consequently, to achieve maximum co-ordination and to ensure that potential development sites are comprehensively explored using agreed site assessment criteria, it is recommended that the Gloucester housing supply review is undertaken in

¹⁵ As set out in more detail in the sections of this report on housing shortfall and retail

tandem with Stroud's Local Plan review, which is currently underway.

270. With regards to Tewkesbury, as already noted, its housing land supply position has significantly changed since submission, leaving it with a substantial shortfall, which can only properly be dealt with by a comprehensive assessment of the options, which will take time. Consequently, to avoid further delay in adoption of the JCS, an immediate review of the Plan is the most appropriate way forward to identify appropriate housing allocations.
271. The JCS authorities are committed to an immediate review of both Gloucester's and Tewkesbury's housing supply following adoption of the JCS. To address this, a new policy is proposed by **MM123c**, Policy REV1: (*Gloucester and Tewkesbury Housing Supply Review*), which is accompanied by explanatory text for Gloucester at **MM123a** and for Tewkesbury at **MM123b**.
272. With respect to retail, as set out under Issue 5 (Retail), a review of retail policy SD3 is required to make the Plan sound. This is to take place immediately upon adoption of the JCS and will take approximately two years to complete. **MM123** is recommended to deal with this.

Conclusion

273. Subject to the identified modifications, I conclude that the provisions for implementation, monitoring, review and ongoing co-operation are satisfactory and that this part of the Plan is sound.

Assessment of Legal Compliance

274. Regulation 8(5) of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires local plans to identify any policies that it intends to supersede. The JCS does not do this and, therefore, **MM134**, **MM134a** and **MM134b** are necessary, which insert lists of superseded policies into the JCS for each authority.
275. Some participants raised concerns about the SA and particularly its consideration of alternative strategic sites. Whilst the SA was generally adequate, and appraised most reasonable alternatives for meeting the Plan's objectives, it rejected certain alternatives too early in the process for what appeared to be non-land use planning reasons. However, in accordance with *Cogent Land LLP v Rochford District Council*, this inadequacy has been cured by an additional SA report, which explains matters raised throughout the examination, as well as addressing relevant main modifications.
276. Issues were also raised in relation to climate change, particularly with respect to flooding. However, I am satisfied that the Plan contains policies designed to secure that the development and use of land in the JCS area contribute to the mitigation of, and adaptation to, climate change, thereby ensuring legal compliance with section 19(1A) of the Planning and Compulsory Purchase Act 2004.
277. Whilst there were some adverse comments from participants to the examination about the nature, adequacy and conduct of public consultation, the JCS authorities' consultation reports generally demonstrate adequate

consultation. Where additional consultation was considered constructive, round table discussions were set up during the examination process to capture participants' submissions. Consequently, there was no breach of the 2012 Regulations in this regard.

278. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that, subject to the identified main modifications, the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	At the time of submission the approved LDSs of each of the Councils were those adopted in April 2011 (GCC), November 2009 (CBC) and April 2013 (TBC) [SUB114]. Subsequent to submission, CBC and GCC each updated their LDS in January 2015 (GCC) and February 2015 (CBC) [EXAM23A & B]. The JCS is identified in each LDS with timing based on information available at the time and dependent on the progression of the JCS examination. The TBC LDS of April 2013 anticipated adoption of the JCS in December 2014, GCC LDS of January 2015 in October 2015 and the CBC LDS of February 2015 in Autumn 2015. Since the final examination hearing in July 2017 each of the Councils has approved a new LDS in October 2017 updating the timing. The JCS content is compliant with each of the Council's LDSs and compliant with the timing within the LDSs adopted by the Councils in October this year.
Statement of Community Involvement (SCI) and relevant regulations	At the time of submission the approved SCIs of each of the Councils were those adopted in July 2005 (GCC), July 2014 (CBC) and May 2013 (TBC) [SUB115]. Consultation on the JCS, including consultation on the post-submission proposed 'main modification' changes, complies with the SCIs' requirements, or with those of their corresponding predecessor documents as applicable.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Habitats Regulations Assessment (HRA)	The Habitats Regulations Assessment Report (May 2014) [SAPR114-119] concludes that the submission JCS would not have adverse effects, alone or in-combination, on the integrity of the identified European Sites. The Sustainability/Integrated Appraisal Addendum Report (October 2016) [Document MM003] concludes and sets out how the proposed modifications (as consulted upon) would not have adverse effects, alone or in-combination,

	on the integrity of the identified European Sites.
National Policy	The JCS complies with national policy except where indicated and modifications are recommended.
2004 Act (as amended) and 2012 Regulations.	The JCS complies with the Act and the Regulations, except in respect of identifying the policies that are superseded by it. That failure to comply is overcome by MM134, 134a & 134b.

Overall Conclusion and Recommendation

279. **Whilst there are issues with the Plan, which cannot be immediately resolved, it is in the public interest to have an adopted Plan in place as soon as possible to reduce continuing ad-hoc, unplanned development. Rather than delaying matters further, the balance is in favour of finding the Plan sound now subject to an immediate partial review.**
280. **The Plan has a number of deficiencies in relation to soundness and/or legal compliance for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.**
281. **The Councils have requested that I recommend main modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.**

Elizabeth C Ord

Inspector

This report is accompanied by the Appendix containing the Main Modifications

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JCS Table of Main Modifications

Explanation of columns

Column Number	1	2	3
Column title	Main Modification number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes
Column Description	<p>Column contains reference for each modification</p> <p>Reference coding:</p> <p>MM 001</p> <p>(sequential)</p>	<p>Column identifies the paragraph or policy to which the modifications relate where appropriate</p> <p>Section or policy;</p> <p>Paragraph or other when appropriate</p>	<p>Column identifies the part of the text within the JCS Pre-Submission version to which the main modification relates.</p> <p>Text to be deleted is 'struckthrough' and <i>new text to be added is in red and italics.</i></p> <p>Text that remains in black is not changed from the Pre-Submission version.</p> <p><i>E.g.</i></p> <p>Housing <i>Employment</i> led development is expected to generate minimal <i>substantial</i> growth</p> <p>NOTE PARAGRAPH NUMBERING IS NOT CORRECT DUE TO DELETIONS/ADDITIONS</p>

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes
MM001a	Part 2 2.17	By 2031, Tewkesbury town <i>and its wider area will be a key location for significant housing and economic growth and</i> will have strengthened its role as a desirable place to live and work, and will continue to be a popular visitor destination. The town will enjoy a strong reputation across the county and further afield, with unique attractions and thriving day- and night-time economies fulfilling a role that complements larger nearby centres and supports the rural borough.
MM001b	Part 2 2.21	Public transport will be improved, particularly the access between the large rural settlements and the main urban areas. <i>The role of Ashchurch for Tewkesbury railway station will be enhanced to provide good quality services and facilities to serve the area.</i>
MM001c	Part 2 2.14	<i>The Cheltenham Development Taskforce has been working extensively with Network Rail and Great Western Railways to improve the Cheltenham Spa station, a station that is the busiest in the County with in excess of 2m passenger movements per year. The scheme is made up of a series of components including improved cycling & pedestrian access, access for all upgrades, decked car parking and improved bus/taxi/private vehicle interchange; the latter funded through Gfirst LEP. The total value of the scheme will be around £5m which will be triggered after Network Rail have completed the extension to the northbound platform in 2017 to allow for the new inter-city express trains that come into service in 2018. This will build capacity, along with further improvements as the strategic allocations at West and North West are built out.</i>
MM001	Part 2 2.1	<i>The Gloucester City Vision 2012-2022</i> Gloucester will be a flourishing, modern and ambitious City, which all residents can enjoy. <i>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.</i>
MM002	Part 2 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 <i>and leisure</i> experience, combined with improved pedestrian, cycle and public transport improvements, <i>including a new bus station</i> . 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.
MM003	Part 2 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.

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes
MM004	Part 2 Para 2.29	<p>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 pedestrian links. However, in the rural areas, maintaining and improving public transport is more challenging.</p> <p><i>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.</i></p> <p><i>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.</i></p>
MM005	Strategic Objective 1 new bullet point	<p>Ambition 1 – a thriving economy Strategic Objective 1 – Building a strong and competitive urban economy</p> <ul style="list-style-type: none"> <i>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</i>
MM006	Strategic Objective 4 & 6	<p>Ambition 2 – a sustainable natural, built and historic environment Strategic Objective 4 – Conserving and enhancing the environment</p>

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes
		<ul style="list-style-type: none"> <li data-bbox="593 312 2045 376">• In partnership with others, creating stronger communities by reducing inequality and social exclusion, <i>enhancing opportunities for high quality education</i>, and thereby increasing social well-being <li data-bbox="593 421 2045 485">• In partnership with others, encouraging healthy lifestyles and a well society through access to key community facilities and services, <i>including sport, recreation and leisure facilities</i>, open spaces and sustainable transport, <i>including public transport</i>.
MM008	3.1.1	<p data-bbox="582 616 1142 639">PART 3 - <i>The JCS Spatial Strategy</i> Strategic Policies</p> <p data-bbox="582 679 2045 855">This part sets out key strategic spatial policies for the JCS area. Policy SP1 sets out the overall strategy concerning the amount of development required, and Policy SP2 sets out the distribution of new development. These two policies, combined with Policy 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.</p>
MM009	3.1.5	<p data-bbox="582 930 2045 1147">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.</p>
MM010	3.1.6	<p data-bbox="582 1163 2045 1375">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 <i>33,500</i> within a range of about 30,500 to 38,000 dwellings and <i>a minimum of 192 hectares of B-class employment land to support approximately 39,500 new jobs</i> about 21,000 to 28,000 jobs. This level of development would reflect both demographic and economic projections <i>and aspirations</i>, 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.</p>

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes
		<p><i>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.</i></p>
MM011	3.1.7	<p>The CCHPR has also examined alternative scenarios and further detail of this work is included in the JCS 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.</p>
MM012	3.1.7	<p><i>The requirements set out in Policy SP1 reflect the evidence and take into account the following key issues:</i></p> <ul style="list-style-type: none"> • <i>Population growth and changing household size</i> • <i>The effect of, and prospects for, economic growth</i> • <i>The dynamics of the local housing market</i> • <i>Landscape and environmental constraints</i> • <i>Infrastructure capacity and deliverability</i> • <i>Role and function of the Green Belt</i> • <i>The Duty to Co-operate across local authority boundaries.</i>
MM013	Policy SP1 – The Need for New Development	<p>Policy SP1: The Need for New Development</p> <ol style="list-style-type: none"> 1. During the plan period, provision will be made to meet the need for <i>approximately</i> about 30,500 35,175 new homes and <i>a minimum of 192 hectares of B-class employment</i> land to support <i>approximately</i> about 28,000 39,500 new jobs. 2. This is to be delivered by development within existing urban areas through district plans, existing commitments, urban extensions to Cheltenham and Gloucester, and the provision of Strategic Allocations at Ashchurch. This strategy aims to locate jobs near to the economically active population, increasing sustainability, and reducing out-commuting thereby reducing carbon emissions from unsustainable car use. 3. This housing requirement for each local authority will be as follows: <ul style="list-style-type: none"> • Gloucester 11,300 at least 14,359 new homes • Cheltenham 9,100 at least 10,917 new homes • Tewkesbury 10,100 at least 9,899 new homes <p>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.</p>

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes									
		This policy contributes towards achieving Objectives 1, 2, 3, 6, 7 and 8.									
MM014	3.1.8 3.1.9 3.1.10	<p>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.</p> <p>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.</p> <p>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.</p> <table border="1" data-bbox="584 863 1554 1038"> <thead> <tr> <th colspan="2" data-bbox="584 863 1137 938">Annual JCS Housing Delivery</th> <th data-bbox="1137 863 1554 938">Annual JCS Housing Requirement</th> </tr> <tr> <th data-bbox="584 938 855 991">1991–2001</th> <th data-bbox="855 938 1137 991">2001–2011</th> <th data-bbox="1137 938 1554 991">2011–2031</th> </tr> </thead> <tbody> <tr> <td data-bbox="584 991 855 1038">1326</td> <td data-bbox="855 991 1137 1038">1450</td> <td data-bbox="1137 991 1554 1038">1525</td> </tr> </tbody> </table>	Annual JCS Housing Delivery		Annual JCS Housing Requirement	1991–2001	2001–2011	2011–2031	1326	1450	1525
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MM015	3.1.8 3.1.9	<p><i>The assessment of the OAN for housing follows the approach indicated by the NPPF and the PPG and takes as its starting point the latest official population forecasts and household projections. For the JCS this has meant using the Office for National Statistics (ONS) 2012 Sub-national Population Projections for England (May 2014) and the Department for Communities and Local Government (DCLG) 2012-based household projections (February 2015). However, the OAN assessment has also used the most recent evidence on how the population has changed. As such the assessment has been further adjusted to take into account the ONS 2014 Mid-Year Estimates (June 2015) and the latest ONS estimates for international migration statistics (August 2015). Using the latest available population and household formation data produced a demographically based estimate of the OAN for the JCS area of 31,830 homes over the plan period to 2031, as set out in Table SP1a below.</i></p> <p><i>Table SP1a Demographic housing needs in the JCS area</i></p>									

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes				
			<i>Gloucester</i>	<i>Cheltenham</i>	<i>Tewkesbury</i>	<i>JCS</i>
		<i>Demographic OAN 2011-31</i>	<i>13,290</i>	<i>9,900</i>	<i>8,640</i>	<i>31,830</i>
		<p><i>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.</i></p> <p><i>In May 2016 the 2014 sub-national population projections were issued, as were the 2014-based household projections in July 2016. However, following review of this data (EXAM 263) it is considered that neither affects the housing need in the JCS. This is because the JCS housing needs have been employment led and the new demographic and household forecasts do not affect the number of homes needed to house the workforce required to support the projected job growth.</i></p>				
MM016	3.1.11 3.1.12 3.1.13	<p>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, <i>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 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.</i> 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.</p> <p>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</p>				

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes
		<p>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.</p> <p>The requirements set out in Policy SP1 reflect the evidence and take into account the following key issues:</p> <ul style="list-style-type: none"> • Population growth and changing household size • The effect of, and prospects for, economic growth • The dynamics of the local housing market • Landscape and environmental constraints • Infrastructure capacity and deliverability • Role and function of the Green Belt • The Duty to Co-operate across local authority boundaries.
MM017	3.1.11 3.1.12 3.1.13	<p><i>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.</i></p> <p><i>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.</i></p> <p><i>Table SP1b OAN with economic uplift</i></p>

JCS Table of Main Modifications

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		<table border="1" data-bbox="584 309 1532 454"> <thead> <tr> <th></th> <th><i>Gloucester</i></th> <th><i>Cheltenham</i></th> <th><i>Tewkesbury</i></th> <th><i>JCS</i></th> </tr> </thead> <tbody> <tr> <td><i>Policy-on OAN 2011-31</i></td> <td><i>13,675</i></td> <td><i>10,395</i></td> <td><i>9,425</i></td> <td><i>33,500</i></td> </tr> </tbody> </table> <p data-bbox="584 491 2051 587"><i>The employment forecasts for the JCS area are subject to considerable uncertainty and this is demonstrated in the way that they can change over a relatively short period of time. However, the JCS authorities believe that by establishing an OAN of 33,500 dwellings, this will ensure that economic growth in the area is not constrained by the supply of housing.</i></p> <p data-bbox="584 624 2051 751"><i>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.</i></p> <p data-bbox="584 788 1048 815">Table SP1c 'Policy-On' OAN with 5% Uplift</p> <table border="1" data-bbox="584 815 1550 970"> <thead> <tr> <th></th> <th><i>Gloucester</i></th> <th><i>Cheltenham</i></th> <th><i>Tewkesbury</i></th> <th><i>JCS</i></th> </tr> </thead> <tbody> <tr> <td><i>Policy-on OAN + 5% Uplift 2011-31</i></td> <td><i>14,359</i></td> <td><i>10,917</i></td> <td><i>9,899</i></td> <td><i>35,175</i></td> </tr> </tbody> </table>		<i>Gloucester</i>	<i>Cheltenham</i>	<i>Tewkesbury</i>	<i>JCS</i>	<i>Policy-on OAN 2011-31</i>	<i>13,675</i>	<i>10,395</i>	<i>9,425</i>	<i>33,500</i>		<i>Gloucester</i>	<i>Cheltenham</i>	<i>Tewkesbury</i>	<i>JCS</i>	<i>Policy-on OAN + 5% Uplift 2011-31</i>	<i>14,359</i>	<i>10,917</i>	<i>9,899</i>	<i>35,175</i>
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MM018	3.1.10 3.1.14 3.1.15 3.1.16	<p data-bbox="584 1043 678 1070">Delivery</p> <p data-bbox="584 1107 2051 1235"><i>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.</i></p> <table border="1" data-bbox="584 1272 1554 1393"> <thead> <tr> <th colspan="2">Annual JCS Housing Delivery</th> <th>Annual JCS Housing Requirement</th> </tr> </thead> <tbody> <tr> <td>1991-2001</td> <td>2001-2011</td> <td>2011-2031</td> </tr> </tbody> </table>	Annual JCS Housing Delivery		Annual JCS Housing Requirement	1991-2001	2001-2011	2011-2031														
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JCS Table of Main Modifications

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		1326	1450	1759
<p><i>Policy SP2 provides the spatial strategy how development will be distributed and delivered across the JCS area. A key part of the delivery will be through the development of the Strategic Allocation sites that are identified through Policy SA1. These large sites will make a key contribution towards the housing and employment needs of the area. However, whilst the JCS provides the strategic-level part of the development plan, there is a significant role for delivery at the non-strategic level through both the district and neighbourhood plans.</i></p> <p><i>Each authority will also be covered by a district-level plan, namely the Gloucester City Plan, Cheltenham Borough Plan and Tewkesbury Borough Plan. These plans will provide more detailed and locally specific planning policies as well as non-strategic site allocations. The district plans will deliver the individual district capacities identified through the JCS in accordance with the spatial strategy. Neighbourhood plans must be in conformity with strategic policies of the development plan and can have an important role in identifying sites and policies to guide development at the local level. Where neighbourhood plans are 'made', they form part of the development plan and its policies will be used in decision making to determine planning applications. The JCS authorities recognise the contribution that neighbourhood plans can make in helping the delivery of growth and will work with town and parish councils and community groups to support them in producing plans.</i></p> <p>Delivery</p> <p>To assess the performance of the JCS, <i>including delivery against the OAN</i>, 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.</p> <p>The <i>monitoring arrangements set out in the Delivery, Monitoring and Review section</i> authorities' monitoring reports (AMRs) will have a role in <i>enable the JCS authorities to</i> identifying <i>how</i> where policies <i>and sites</i> are not delivering against the plan objectives and strategy as intended. The <i>monitoring</i> AMRs may also suggest courses of action to address <i>any</i> 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.</p> <p>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</p>				

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Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes
		<p>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.</p>
MM019	3.2.1 3.2.2 3.2.3	<p>Both the level and distribution of housing and employment is influenced by the vision of the JCS, and informed by sustainability principles and by the JCS Sustainability Appraisal process, which must be <i>has been</i> 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.</p> <p>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 <i>maintained</i> between all Gloucestershire districts covering issues which require joint working. <i>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.</i> In particular, the Gloucestershire authorities have worked together on an update of the Strategic Housing Market Assessment (SHMA).</p> <p>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. <i>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.</i> Consideration will be given to meeting unmet requirements from another local planning authority <i>within and outside</i> the housing market area, where it is reasonable to do so and consistent with achieving sustainable development.</p>
MM020	Policy SP2: Distribution of New Development	<p>Policy SP2: Distribution of New Development</p> <p>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.</p> <p>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,</p>

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes
		<p>to support about 28,000 new jobs.</p> <ul style="list-style-type: none"> ● Gloucester and its urban extensions will accommodate about 11,943 new homes ● Cheltenham and its urban extensions will accommodate about 10,720 new homes ● Elsewhere within Tewkesbury Borough development will accommodate about 8,377 new homes <p>3. This will be met:</p> <ul style="list-style-type: none"> ● Through strategic allocations at Ashchurch ● 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. <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> ● The rural service centres will accommodate 1860 new homes, and ● The service villages will accommodate 752 new homes <p>6. In the remainder of the rural area, Policy SD11 will apply.</p> <p>(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.)</p> <p>This policy contributes towards achieving Objectives 1, 2, 3, 4, 5, 6, 7, 8 and 9.</p>

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Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes
		<p>Policy SP2: Distribution of New Development</p> <ol style="list-style-type: none"> 1. <i>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.</i> 2. <i>To meet the needs of Gloucester City the JCS will make provision for at least 14,359 new homes. At least 13,287 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.</i> 3. <i>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.</i> 4. <i>To meet the needs of Tewkesbury Borough, none of which is being met by the urban extensions to Gloucester and Cheltenham, the JCS will make provisions for at least 9,899 new homes. At least 7,445 dwellings will be provided through existing commitments, development at Tewkesbury Town in line with its role as a market town, smaller-scale development meeting local needs at Rural Service Centre and Service Villages, and sites covered by any Memoranda of Agreement.</i> 5. <i>Rural service centres and service villages as identified in Table SP2c below will accommodate lower levels of development to be allocated through the Tewkesbury Borough Plan and Neighbourhood Plans, proportional to their size and function, and also reflecting their proximity and accessibility to Cheltenham and Gloucester and taking into account the environmental, economic and social impacts including existing levels of growth over the plan period. Over the plan period to 2031:</i> <ul style="list-style-type: none"> • <i>The rural service centres will accommodate in the order of 1860 new homes, and</i> • <i>The service villages will accommodate in the order of 880 new homes</i> 6. <i>In the remainder of the rural area, Policy SD11 will apply to proposals for residential development.</i> 7. <i>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</i>

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Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes
		<p><i>Agreement between the relevant local planning authorities.</i></p> <p><i>8. The identification of any additional urban extensions to help meet the unmet needs of a local planning authority must be undertaken through a review of the plan. Any additional site allocations made through a local plan or any neighbourhood plans must be in conformity with the JCS spatial strategy. Consideration will also be given to meeting needs in another local authority area where it is clearly established that they cannot be met within the JCS area, or provide a more sustainable and appropriate option.</i></p> <p><i>9. To support economic growth in the JCS area, the JCS will make provision for at least 192 hectares of B-class employment land. At least 84 hectares of B class employment land will be delivered on strategic Allocation sites as detailed at Policy SA1. Any further capacity will be identified in District Plans.</i></p> <p><i>(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)</i></p> <p><i>This policy contributes towards achieving Objectives 1, 2, 3, 4, 5, 6, 7, 8 and 9.</i></p>
MM021	3.2.5 3.2.6 3.2.7 3.2.8 3.2.9	<p>Explanation</p> <p>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.</p> <p>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 2016⁴ count towards meeting needs in the early part of the plan; secondly, sites which have already been granted planning permission, <i>including those that are</i> 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) <i>Strategic Assessment of Land Availability (SALA)</i> process, although this does not consider all constraints which could prevent sites coming forward.</p> <p>We have made <i>An</i> assumptions <i>has been made</i> 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.</p>

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		<p>There are also further sites to be identified through the district plans. Work on the Gloucester <i>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.</i> plan is already well advanced, 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 <i>approximately 58%</i>62% of the <i>housing to be delivered in the JCS identified need (19,700</i> 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.</p> <p>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 <i>additional</i> land for at least 38% of <i>to meet</i> 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 <i>which would</i> accommodate the remaining <i>approximately 35% of the housing supply identified in the JCS</i> growth. As concluded by the SA <i>Sustainability Appraisal</i>, 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/</p>
MM022	3.2.10 3.2.11	<p>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 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.</p>

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Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes
		<p>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.</p> <p><i>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).</i></p> <p><i>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.</i></p> <p><i>Beyond Gloucester, Cheltenham and the Strategic Allocations, further development will be accommodated within Tewkesbury Borough. Tewkesbury Town, in accordance with its role as a market town, will deliver development. For the wider rural area, the starting point for the distribution of development was drawn from the evidence set out within the Rural Area Settlement Audit, updated in 2015, available to view on the JCS website. There are two settlements, Bishop's Cleeve and Winchcombe, which offer a higher range of services and facilities within the rural areas; these are defined as rural service centres.</i></p> <p><i>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.</i></p>
MM023	3.2.12 3.2.13	<p>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</p>

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes
	3.2.14	<p>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. <i>The total number of dwellings that is being provided for within the JCS area is approximately 31,824, which includes a contribution from Wychavon. This is lower than the overall housing requirement (including economic and 5% uplift) of 35,175. This shortfall occurs in meeting the needs of both Gloucester City and Tewkesbury Borough.</i></p> <p><i>In meeting the needs of Gloucester it has been necessary to allocate sites on the edge of the urban area in Tewkesbury Borough. However, due to significant constraints and availability of land it has not been possible to allocate sites in the JCS to meet all of Gloucester's need over the plan period. Nevertheless, Gloucester has a good supply of housing land for the short to medium term that will enable it to meet its requirements to at least 2028/29. This will allow adequate time for an early review of the plan to explore further the potential for additional sites to meet Gloucester's needs in the longer term towards the end of the plan period. This would also allow the consideration of additional development options that may become available, both within and outside the JCS area. This could include the unlocking of further development opportunities within the urban area, as well as potential new urban extensions in Tewkesbury Borough and Stroud District or elsewhere within the housing market area. The JCS authorities have a Memorandum of Understanding in place with Stroud District in this regard.</i></p> <p><i>At Tewkesbury town there are similar issues with allocating strategic sites that are within the JCS area when taking into account the significant constraints and availability of land around the urban area. This issue has been exacerbated by the decision by the Defence Infrastructure Organisation regarding the delayed release of the MoD Ashchurch site. As a result Tewkesbury Borough has an identified shortfall against the total JCS requirement of approximately 2,450 dwellings. Nevertheless, there are opportunities for development at the MoD Ashchurch site within the plan period if infrastructure constraints can be overcome to release available parts of the site. Similarly there is potential for development at a site at Fiddington once the highway infrastructure needs around the A46 and M5 Junction 9 are established. While these sites cannot be allocated now due to uncertainties over their deliverability and capacity, a commitment has been set out in the Delivery, Monitoring & Review section to undertaking an immediate review of Tewkesbury's housing supply so that further work on the development potential around the Tewkesbury town and Ashchurch area can be carried out.. Further information is also provided in the JCS Housing Implementation Strategy. In addition, there is joint working with Wychavon District Council to look to bring forward the cross-boundary site at Mitton, adjacent to town. The adopted South Worcestershire Development Plan (2006-2030) already includes a policy commitment to consider, including through a review of the plan, meeting the needs of other authorities within the SWDP area. The site at Mitton is specifically referenced in this context. In addition, there is joint working with Wychavon District Council to assess the potential and possible release of land at Mitton.</i></p> <p><i>As noted above there is currently a significant shortfall identified for Tewkesbury. However, Tewkesbury has an oversupply against its annual requirement from 2011/12 to 2016/17 and has a good supply of housing land that will enable it to meet its requirements over</i></p>

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes
		<p><i>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.</i></p> <p>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.</p> <p>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 <i>Housing Implementation Strategy</i> Housing Background Paper, available on the JCS website.</p>
MM024	3.2.15 3.2.16 3.2.17 3.2.18 3.2.19 3.2.20	<p>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.</p> <p>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.</p> <p>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 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.</p> <p>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.</p> <p>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</p>

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes
		<p>and Winchcombe, which offer a higher range of services and facilities within the rural areas; these are defined as rural service centres.</p> <p>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.</p>
MM025	3.2.20	<p><i>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 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.</i></p> <p><i>The JCS Economic Update Note (February 2016) assessed the potential employment land supply for each of the districts. This used information provided through the Strategic Assessment of Land Availability to present a broad indicator of potential capacity based on the availability, suitability and deliverability of the sites. It also explored existing undeveloped commitments and existing allocations. This Update Note provided an indicative availability of B-class land of approximately 7ha at Gloucester City, 1ha in Cheltenham Borough and 40ha in Tewkesbury Borough, as well as 63ha of existing undeveloped employment land (based on previous allocations and extant permissions). With the JCS Strategic Allocations, a total of 195ha of B-class employment land is identified. Further investigation into employment allocations and capacity will be undertaken through the district plans.</i></p>
MM026	3.2.20	<p><i>Apportionment of Urban Extensions</i></p> <p><i>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.</i></p>

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes																		
		<p><i>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.</i></p>																		
MM027	3.2.21 3.2.22	<p>Delivery</p> <p>To assess the performance of the JCS, a separate monitoring framework is included in the plan, setting out the key indicators and contingencies that will be critical to the successful delivery of the plan strategy. <i>This is set out within the Delivery, Monitoring and Review section.</i></p> <p><i>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.</i></p> <p>The AMRs <i>JCS monitoring</i> will have a role in identifying 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.</p>																		
MM028	Table SP2a: Distribution of Development in the JCS area	<p>Table SP2a: Distribution of development in the JCS area</p> <table border="1" data-bbox="584 1027 1877 1375"> <thead> <tr> <th data-bbox="584 1027 958 1098">Distribution of Development</th> <th data-bbox="958 1027 1285 1098">Net additional dwellings to 2031</th> <th data-bbox="1285 1027 1877 1098">Ha. of employment land to 2031</th> </tr> </thead> <tbody> <tr> <td colspan="3" data-bbox="584 1098 1877 1129">Gloucester</td> </tr> <tr> <td colspan="3" data-bbox="584 1129 1877 1161">Total requirement for Gloucester City Council is 11,300 until 2031</td> </tr> <tr> <td data-bbox="584 1161 958 1214">District capacity*</td> <td data-bbox="958 1161 1285 1214">7,793</td> <td data-bbox="1285 1161 1877 1214">To be determined through the Gloucester City Plan</td> </tr> <tr> <td data-bbox="584 1214 958 1347">Unmet need (to be met by urban extensions to Gloucester and Cheltenham – see Table SP2b)</td> <td data-bbox="958 1214 1285 1347">3,507</td> <td data-bbox="1285 1214 1877 1347"></td> </tr> <tr> <td data-bbox="584 1347 958 1375">Total</td> <td data-bbox="958 1347 1285 1375">11,300</td> <td data-bbox="1285 1347 1877 1375">26.5 ha</td> </tr> </tbody> </table>	Distribution of Development	Net additional dwellings to 2031	Ha. of employment land to 2031	Gloucester			Total requirement for Gloucester City Council is 11,300 until 2031			District capacity*	7,793	To be determined through the Gloucester City Plan	Unmet need (to be met by urban extensions to Gloucester and Cheltenham – see Table SP2b)	3,507		Total	11,300	26.5 ha
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District capacity*	7,793	To be determined through the Gloucester City Plan																		
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Total	11,300	26.5 ha																		

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes		
		Cheltenham		
		Total requirement for Cheltenham Borough Council is 9,100 until 2031		
		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
		Unmet need (to be met by urban extensions to Gloucester and Cheltenham – see Table SP2b)	1,725	
		Total	9,100	23.4 ha
		Tewkesbury		
		Total requirement for Tewkesbury Borough Council is 10,100 until 2031		
		District capacity*	10,640	To be determined through the Tewkesbury Borough Plan
		Unmet need	0	
		Total	10,640	34.3 ha
		TOTAL HOUSING SUPPLY ACROSS THE JCS AREA	31,040	64.2 (plus 20 replacement of existing use at A8 site strategic allocation)
		* 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.		
		Table SP2a: Sources of housing supply in the JCS area		
			Housing Supply	
		Gloucester City		
		Completions	2,962	
		Commitments*	2,460	
		Windfall Allowance	832	

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes	
		<i>Gloucester City Plan (Further Potential)</i>	1,518
		<i>Strategic Allocations (Gloucester City)</i>	620
		<i>Urban Extensions (Tewkesbury Borough)</i>	4,895
		Supply Total	13,287
		Cheltenham Borough	
		<i>Completions</i>	1,724
		<i>Commitments*</i>	2,178
		<i>Existing Local Plan Allocations</i>	10
		<i>Windfall Allowance</i>	784
		<i>Cheltenham Borough Plan (Further Potential)</i>	1,011
		<i>Urban Extensions (Cheltenham Borough)</i>	2,775
		<i>Urban Extensions (Tewkesbury Borough)</i>	2,610
		Supply Total	11,092
		Tewkesbury Borough	
		<i>Completions</i>	3,224
		<i>Deliverable Commitments*</i>	2,854
		<i>Existing Local Plan Allocations</i>	0
		<i>Windfall Allowance</i>	552
		<i>Tewkesbury Borough Plan (Further Potential)</i>	315
		<i>Mitton (Wychavon District)**</i>	500
		Supply Total	7,445
		*Includes Local Plan commitments **site is within Wychavon District and is not an allocation in the JCS. Site is subject to joint working between Wychavon District Council and Tewkesbury Borough Council.	
MM029	Table SP2b Geographical location of strategic	Table SP2b Geographical location of strategic allocation sites	

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes				
		Strategic Allocations	Gloucester City-Council	Cheltenham Borough Council	Tewkesbury Borough Council	TOTAL NUMBER OF PROPOSED DWELLINGS
	allocation sites	A1 Innsworth	N/A	N/A	1,250	1,250
		A2 North Churchdown	N/A	N/A	532	532
		A3 South Churchdown	N/A	N/A	868	868
		A4 North Brockworth	N/A	N/A	1,500	1,500
		A5 North West Cheltenham	N/A	1800	2,985	4,785
		A6 South Cheltenham/ Leckhampton	N/A	764	360	1,124
		A8 MoD site at Ashchurch*	N/A	N/A	2,125	2,125
		TOTAL	0	2,564	9,620	12,184
		<p>The urban extensions to help meet the needs of Gloucester are all located within Tewkesbury Borough. 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.</p> <p>* 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.</p>				

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes																																					
		<p data-bbox="584 344 1429 371">Table SP2b Apportionment of Strategic Allocation Sites and District Capacity</p> <table border="1" data-bbox="584 405 1653 1347"> <thead> <tr> <th data-bbox="584 405 808 461">SUB AREA</th> <th data-bbox="808 405 1240 461">AREA</th> <th data-bbox="1240 405 1451 461">Authority Area</th> <th data-bbox="1451 405 1653 461">Housing Supply</th> </tr> </thead> <tbody> <tr> <td data-bbox="584 461 808 788" rowspan="5"><i>Gloucester City Supply</i></td> <td data-bbox="808 461 1240 517"><i>Gloucester City Urban Capacity</i></td> <td data-bbox="1240 461 1451 517"><i>GCC</i></td> <td data-bbox="1451 461 1653 517"><i>7,772</i></td> </tr> <tr> <td data-bbox="808 517 1240 572"><i>Winnycroft Urban Extension</i></td> <td data-bbox="1240 517 1451 572"><i>GCC</i></td> <td data-bbox="1451 517 1653 572"><i>620</i></td> </tr> <tr> <td data-bbox="808 572 1240 676"><i>Innsworth & Twigworth Urban Extension</i></td> <td data-bbox="1240 572 1451 676"><i>TBC</i></td> <td data-bbox="1451 572 1653 676"><i>2,295</i></td> </tr> <tr> <td data-bbox="808 676 1240 732"><i>South Churchdown Urban Extension</i></td> <td data-bbox="1240 676 1451 732"><i>TBC</i></td> <td data-bbox="1451 676 1653 732"><i>1,100</i></td> </tr> <tr> <td data-bbox="808 732 1240 788"><i>North Brockworth Urban Extension</i></td> <td data-bbox="1240 732 1451 788"><i>TBC</i></td> <td data-bbox="1451 732 1653 788"><i>1,500</i></td> </tr> <tr> <td data-bbox="584 788 808 995" rowspan="3"><i>Cheltenham Borough Supply</i></td> <td data-bbox="808 788 1240 844"><i>Cheltenham District Capacity</i></td> <td data-bbox="1240 788 1451 844"><i>CBC</i></td> <td data-bbox="1451 788 1653 844"><i>5,707</i></td> </tr> <tr> <td data-bbox="808 844 1240 948"><i>North West Cheltenham Urban Extension</i></td> <td data-bbox="1240 844 1451 948"><i>CBC/TBC</i></td> <td data-bbox="1451 844 1653 948"><i>4,285</i></td> </tr> <tr> <td data-bbox="808 948 1240 995"><i>West of Cheltenham Urban Extension</i></td> <td data-bbox="1240 948 1451 995"><i>CBC/TBC</i></td> <td data-bbox="1451 948 1653 995"><i>1,100</i></td> </tr> <tr> <td data-bbox="584 995 808 1347" rowspan="2"><i>Tewkesbury Borough Area Supply</i></td> <td data-bbox="808 995 1240 1091"><i>Tewkesbury Borough District Capacity</i></td> <td data-bbox="1240 995 1451 1091"><i>TBC</i></td> <td data-bbox="1451 995 1653 1091"><i>6,945</i></td> </tr> <tr> <td data-bbox="808 1091 1240 1347"> <i>Mitton*</i> <i>*site is within Wychavon District and is not an allocation in the JCS. Site is subject to joint working between Wychavon District Council and Tewkesbury Borough Council.</i> </td> <td data-bbox="1240 1091 1451 1347"><i>WDC</i></td> <td data-bbox="1451 1091 1653 1347"><i>500</i></td> </tr> </tbody> </table>	SUB AREA	AREA	Authority Area	Housing Supply	<i>Gloucester City Supply</i>	<i>Gloucester City Urban Capacity</i>	<i>GCC</i>	<i>7,772</i>	<i>Winnycroft Urban Extension</i>	<i>GCC</i>	<i>620</i>	<i>Innsworth & Twigworth Urban Extension</i>	<i>TBC</i>	<i>2,295</i>	<i>South Churchdown Urban Extension</i>	<i>TBC</i>	<i>1,100</i>	<i>North Brockworth Urban Extension</i>	<i>TBC</i>	<i>1,500</i>	<i>Cheltenham Borough Supply</i>	<i>Cheltenham District Capacity</i>	<i>CBC</i>	<i>5,707</i>	<i>North West Cheltenham Urban Extension</i>	<i>CBC/TBC</i>	<i>4,285</i>	<i>West of Cheltenham Urban Extension</i>	<i>CBC/TBC</i>	<i>1,100</i>	<i>Tewkesbury Borough Area Supply</i>	<i>Tewkesbury Borough District Capacity</i>	<i>TBC</i>	<i>6,945</i>	<i>Mitton*</i> <i>*site is within Wychavon District and is not an allocation in the JCS. Site is subject to joint working between Wychavon District Council and Tewkesbury Borough Council.</i>	<i>WDC</i>	<i>500</i>
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JCS Table of Main Modifications

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		<i>Total JCS Area</i>		<i>31,824</i>											
MM030	Table SP2c: Settlement hierarchy	<p>Table SP2c: Settlement hierarchy</p> <table border="1" data-bbox="826 432 1805 1345"> <thead> <tr> <th data-bbox="826 432 1357 491">Settlement tier</th> <th data-bbox="1357 432 1805 491">Settlements</th> </tr> </thead> <tbody> <tr> <td data-bbox="826 491 1357 608">Key Urban Areas</td> <td data-bbox="1357 491 1805 608">Cheltenham Gloucester</td> </tr> <tr> <td data-bbox="826 608 1357 667">Market town</td> <td data-bbox="1357 608 1805 667">Tewkesbury</td> </tr> <tr> <td data-bbox="826 667 1357 780">Rural service centres</td> <td data-bbox="1357 667 1805 780">Bishop’s Cleeve Winchcombe</td> </tr> <tr> <td data-bbox="826 780 1357 1345">Service villages *</td> <td data-bbox="1357 780 1805 1345">Alderton Coombe Hill Gotherington Highnam Maisemore Minsterworth Norton Shurdington <i>Stoke Orchard</i> Toddington (inc. New Town)</td> </tr> </tbody> </table>				Settlement tier	Settlements	Key Urban Areas	Cheltenham Gloucester	Market town	Tewkesbury	Rural service centres	Bishop’s Cleeve Winchcombe	Service villages *	Alderton Coombe Hill Gotherington Highnam Maisemore Minsterworth Norton Shurdington <i>Stoke Orchard</i> Toddington (inc. New Town)
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Service villages *	Alderton Coombe Hill Gotherington Highnam Maisemore Minsterworth Norton Shurdington <i>Stoke Orchard</i> Toddington (inc. New Town)														

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			<div data-bbox="824 304 1355 480" style="border: 1px solid black; width: 237px; height: 110px;"></div> <p data-bbox="1355 304 2056 480">Twigworth Twynning Woodmancote</p> <p data-bbox="571 512 2056 643">* The service village classification was informed by the 20153 Settlement Audit <i>Refresh</i>. 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.</p>
MM031	SD1	<p data-bbox="571 643 2056 675">SD1 – PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT</p> <p data-bbox="571 707 2056 738">Background</p> <p data-bbox="571 770 2056 871">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</p>	

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		<p>Policy SD1: Presumption in Favour of Sustainable Development</p> <p>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.</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> 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 ii. Specific policies in that framework indicate that development should be restricted. <p>This policy contributes towards achieving all of the JCS Strategic Objectives.</p> <p>.</p> <p>Explanation</p> <p>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, 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.</p>

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		<p>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.</p> <p>Delivery</p> <p>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.</p>
MM032	SD2 4.2.1	<p>Background</p> <p>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.</p> <p><i>A core planning principle of the NPPF and one of the starting points for the spatial strategy of the JCS is the delivery of sustainable economic development. To reflect this planning principle and to also support the implementation of the Strategic Economic Plan for Gloucestershire (SEP), the JCS has established a vision to provide the context for economic growth;</i></p> <p><i>“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”.</i></p> <p><i>This vision is underpinned by three specific strategic objectives to support a thriving economy through building a strong and competitive urban economy, ensuring the vitality of town centres and supporting a prosperous rural economy.</i></p>
MM033	SD2 4.2.2	<p>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. <i>Retail and other uses, including those within use class ‘A’</i></p>

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		<p><i>are not covered by this Policy and are dealt with in Policy SD3.</i> More detailed policies will be included in district plans.</p> <p><i>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.</i></p>
MM034	Policy SD2	<p>Policy SD2: Employment – <i>except retail development</i></p> <p>1. Employment-related development will be supported:</p> <p>i. <i>At Strategic Allocations, in line with Policy SA1, where it is expected that employment land should normally be used for B class uses, except where it can be demonstrated that non B class uses would support the residential and B class development at that strategic allocation. In order to support key growth sectors or other key local economic drivers, on some Strategic Allocations, priority will be given to specific sectors as set out in detail in the SA site policies; or</i></p> <p>ii. <i>At locations allocated for employment use within the Development Plan</i></p> <p>iii. <i>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</i></p> <p>iv. <i>For the development of new employment land within Gloucester City, the Principal Urban Area of Cheltenham and Tewkesbury town,</i></p> <p>ii. for development of new or existing buildings within Gloucester, Cheltenham and Tewkesbury town; or</p> <p>iii.v. <i>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</i></p>

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		<p>iv.vi. in the wider countryside when it is:</p> <ul style="list-style-type: none"> • located within or adjacent to a settlement <i>or existing employment area</i> and of an appropriate scale and character • 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. <p><i>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</i></p> <p><i>viii. where it would encourage and support the development of small and medium sized enterprises, subject to all other policies of the plan</i></p> <p>.</p> <p>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.</p> <p>This policy contributes towards achieving Objectives 1, 2, 3 and 9.</p>
MM035	<p>4.2.3 4.2.4 4.2.5 4.2.6 4.2.7 4.2.8 4.2.9 4.2.10 4.2.11 4.2.12</p>	<p>Explanation</p> <p>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.</p> <p>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:</p>

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		<p>Promotion: To promote Gloucestershire as a great place to work, visit and invest.</p> <p>Connection: To develop the infrastructure that will support economic growth.</p> <p>Skills: To create a highly employable and productive population.</p> <p><i>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 provision for the JCS area as a whole.</i></p> <p><i>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 allocation A9), near Junction 10 employment land is included in the North West Cheltenham strategic allocation (strategic allocation A5) and at West Cheltenham strategic allocation (strategic allocation A11). 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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>Key growth sectors and other important local economic drivers</i></p> <p><i>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</i></p>

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		<p><i>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.</i></p> <p><i>M5 growth corridor</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p>This policy-<i>Policy SD2</i> aims to support employment development and economic prosperity by taking an economic-led, urban-focused development approach, with the primary aim of attracting investment and development to the main urban areas and the Strategic Allocations in the plan area. The strategy seeks to deliver strong, robust and resilient urban areas which create jobs and wealth. This in turn will support the on-going regeneration programmes of Gloucester and Cheltenham urban areas.</p> <p>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</p>

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		<p>space exceeds 1,000 square metres or the site area is 1 hectare or more.</p> <p>Employment uses, such as retail (<i>covered in policy SD3</i>), 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.</p> <p><i>Key growth sectors</i></p> <p><i>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:-</i></p> <ul style="list-style-type: none"> • <i>Aviation</i> • <i>Cyber technology</i> • <i>Energy</i> • <i>Engineering</i> • <i>Financial</i> • <i>Information technology</i> • <i>Leisure</i> • <i>Marketing and public relations</i> <p><i>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.</i></p> <p>To assess how the need for employment land can be met, each council has prepared a Strategic Assessment of Land Availability <i>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</i></p>

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		<p><i>where development would support urban regeneration or the rural economy.</i> 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, Because <i>B</i>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.</p> <p>Providing start-up space that can be easily accessed by those establishing new businesses is also vital to stimulate innovation and entrepreneurship within the JCS area; developments are especially encouraged which provide a range of types and sizes of units including start-up and flexible workspaces. More information and guidance in this respect will come forward in district plans. Where specialised skills are available, clusters of enterprises can add value to the economy. This spatial strategy can support skills development by encouraging the provision and expansion of suitable education and training facilities with access in person and by electronic means.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p><i>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.</i></p> <p><i>Cheltenham racecourse</i></p>

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		<p><i>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.</i></p> <p><i>The Racecourse’s primary function as a racing venue brings significant economic benefits to the region in terms of financial income and job creation:</i></p> <ul style="list-style-type: none"> <i>• 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).</i> <i>• The Racecourse currently employs 85 full time staff on site, with the additional employment of around 5,000 staff during the Festival</i> <i>• 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</i> <p><i>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.</i></p> <p><i>Gloucestershire airport</i></p> <p><i>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.</i></p> <p><i>The Tewkesbury Borough Plan, in line with the Council’s Economic Development objectives, will continue to examine the growth of the airport and the businesses surrounding it, to encourage flexibility and the relevant need for different land uses to support its ongoing</i></p>

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		<p><i>operation. This will include ongoing review of the essential and non-essential operational areas of the site together with their definitions, changes to which will be progressed through the Borough Plan.</i></p> <p><i>Gloucestershire University</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>Tourism</i></p> <p><i>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.</i></p> <p><i>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</i></p>

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		<p><i>plans. and in the Tewkesbury Borough Economic Strategy.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>Regeneration</i></p> <p><i>The reuse and regeneration of sites within the urban areas is a high priority for Gloucester.</i></p> <p><i>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.</i></p> <p><i>The regeneration of Tewkesbury town centre is a key area of work for the Borough Council. A Tewkesbury Town Centre Masterplan: Strategic Framework Document was approved in July 2012, which set out a range of key projects aimed at regenerating the town centre; these include specific projects, such as riverside enhancement, the regeneration of key town centre sites, a new leisure centre, and a programme of marketing and inward investment.</i></p> <p><i>The Cheltenham Development Task Force was established in 2010 by Cheltenham Borough Council with its key partners, including Gloucestershire County Council and the Homes and Community Agency; the Task Force is an arm's length advisory body with the purpose of delivering a host of regeneration outputs loosely associated with the former Civic Pride programme. Key achievements include delivery of additional housing, including affordable, the redevelopment of a number of town centre brownfield sites, major uplift and investment to public realm in the town centre, new fit-for purpose office accommodation to enable other sites to be redeveloped in due course, key retail projects and investment in public transport. The Task Force was originally focused on a limited area within the town centre but has recently expanded its remit to cover the wider Borough of Cheltenham; this will enable new</i></p>

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		<i>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.</i>
MM036	4.2.13	<p>Delivery</p> <p>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.</p> <p><i>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.</i></p>
MM037	SD3 Title	RETAIL HIERARCHY AND CITY/TOWN CENTRES
MM038	4.3.2	<p>The nature of these centres is changing. This is partly <i>largely</i> due to the <i>structural changes in the retail market and, in particular, the impact of internet shopping</i> 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.</p>

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MM039	Policy SD3	<p>Policy SD3: Retail Hierarchy and city / town centres</p> <p>1. Settlement Hierarchy The area's <i>city and town</i> 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:</p> <p style="padding-left: 40px;">Key Urban Areas Gloucester <i>City Centre</i> and Cheltenham <i>Town Centre</i></p> <p style="padding-left: 40px;">Market town Tewkesbury <i>Town Centre</i></p> <p style="padding-left: 40px;">Rural service centres serving their rural hinterland Winchcombe <i>Town Centre</i> and Bishop's Cleeve <i>Village Centre</i>.</p> <p>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.</p> <p>2. Cheltenham and Tewkesbury Borough Retail Policies <i>Retail policies within the Boroughs of Cheltenham and Tewkesbury are set out in the saved policies of the existing Local Plans. These policies will be reviewed and taken forward through the immediate review of the JCS retail policy. Within the Boroughs of Cheltenham and Tewkesbury, new retail development will be encouraged in accordance with the policies in the saved local plans insofar as they are consistent with national planning policy.</i></p> <p>3. Gloucester City Centre Boundary, Primary Shopping Area and Shopping Frontages <i>In advance of the immediate retail review, for the interim, the City Centre boundary, Primary Shopping Area boundary, and primary frontages and secondary frontages for Gloucester city centre are set out on the policies map. Within the Gloucester City Centre and the Primary Shopping Area, the following approach applies:</i></p> <p style="padding-left: 40px;">i. Gloucester City Centre Boundary and Primary Shopping Area <i>Within the defined City Centre boundary, proposals for leisure, entertainment and recreation, office, arts, culture, tourism,</i></p>

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		<p><i>community facilities and residential development will be supported provided they would not have a significant adverse impact on the amenity of adjacent residents or businesses. Within the defined Primary Shopping Area, proposals for new A1 retail development will be supported.</i></p> <p><i>Proposals for A1 retail development located outside of the Primary Shopping Area, and for other main town centre uses where they are proposed in locations outside of the City Centre boundary, will be assessed in accordance with the sequential test and impact test as set out in the National Planning Policy Framework and Planning Practice Guidance (see criterion 6 below).</i></p> <p>ii. Primary frontages <i>Within the primary shopping frontage identified, the change of use of A1 (retail) premises will not be permitted, unless it can be demonstrated that the unit is not suitable for continued A1 use, the proposed use will maintain or enhance the vitality and viability of the area and it would not have a significant adverse impact on the amenity of adjacent residents or businesses.</i></p> <p>iii. Secondary frontages <i>Within the secondary shopping frontage identified, the change of use of premises from A1 (retail) use to use classes A2 (financial institutions), A3 (restaurants and cafes), A4 (pubs), A5 (hot food takeaway), D1 (non-residential institutions) and D2 (assembly and leisure) will be permitted provided that it would not have a significant adverse impact on the amenity of adjacent residents or businesses-</i></p> <p>4. Retail Floor Space Requirements Over the plan period to 2031, provision will be made for <i>at least</i> the following new <i>retail</i> floorspace requirements in <i>for</i> the existing designated centres <i>following settlements</i>:</p> <table border="1" data-bbox="584 1179 1525 1375"> <thead> <tr> <th data-bbox="584 1179 831 1310"></th> <th data-bbox="831 1179 1189 1310">Convenience goods floorspace capacity (sq. m net)</th> <th data-bbox="1189 1179 1525 1310">Comparison goods floorspace capacity (sq. m net) approx.</th> </tr> </thead> <tbody> <tr> <td data-bbox="584 1310 831 1375">Cheltenham</td> <td data-bbox="831 1310 1189 1375">0</td> <td data-bbox="1189 1310 1525 1375">70,000</td> </tr> </tbody> </table>		Convenience goods floorspace capacity (sq. m net)	Comparison goods floorspace capacity (sq. m net) approx.	Cheltenham	0	70,000
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		Bishop's Cleeve	1,200	625																												
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		<p><i>thresholds as appropriate.</i></p> <p>7. Retail Review</p> <p><i>Following adoption of the JCS, this policy will be subject to an immediate review. The single issue review will take approximately two years to complete. It will cover strategic planning matters relating to the three JCS authorities including issues such as a revised assessment of retail needs, market share between different designated centres, city/town centre boundaries, site allocations, primary and secondary shopping frontages and locally defined impact thresholds.</i></p> <p>This policy contributes towards achieving Objective 2.</p>
MM040	4.3.6	<p>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.</p>
MM041	Additional text after 4.3.6	<p><i>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.</i></p>
MM042	4.3.7 to 4.3.9	<p>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. <i>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</i></p>

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		<p><i>including the continued improvement of its retail offer.</i></p> <p><i>Within Tewkesbury Borough, s</i>Smaller rural service centres, such as Winchcombe and Bishop’s Cleeve, provide for their residents and the residents of surrounding rural areas. Winchcombe and Tewkesbury also function as important tourist destinations.</p> <p>The policy set out above has been prepared in the context of the National Planning Policy Framework (<i>NPPF and Planning Practice Guidance (PPG)</i>). <i>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);</i> prepared by DPDS retail consultants for the JCS authorities. This Retail Study identified s floorspace requirements for convenience (food) and comparison goods (clothes, furniture etc) <i>shopping and convenience goods (food) for each of the main settlements identified in the hierarchy</i> in the existing centres until <i>up to</i> 2031. Where the table in the policy shows ‘0’, this is due to existing planning commitments already providing the required floorspace. The Retail Study (<i>Phase 1</i>) 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.</p> <p><i>For Gloucester City Centre, the policy identifies the Primary Shopping Area, primary and secondary shopping frontages and the City Centre boundary, and which uses will be supported in the different locations. It also sets out the approach for proposals for retail and other main town centre uses located outside of these areas. For centres located in Cheltenham Borough and Tewkesbury Borough, saved policies in the Local Plans will be used.</i></p> <p><i>Following the adoption of the JCS, this policy will be subject to an immediate review.</i></p>
MM043	Delivery 4.3.10	<p>These include, for example, the establishment of detailed town centre boundaries, Primary and Secondary Shopping Areas, the allocation of <i>non-strategic</i> sites to provide for identified need, and the identification of locally defined thresholds for impact assessments (as necessary) <i>and the approach towards smaller non-strategic centres.</i></p>
MM044	SD4 4.4.3	<p>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, <i>and</i> 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</p>

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		<p>nationally described standards.</p> <p>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.</p>
MM045	SD4 - Policy	<p>Policy SD4: Sustainable Design and Construction</p> <ol style="list-style-type: none"> 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. All development will be expected to be adaptable to climate change in respect of the design, layout, siting, orientation and function of both buildings and associated external spaces. Proposals must demonstrate that development is designed to use water efficiently, will not adversely affect water quality, and will not hinder the ability of a water body to meet the requirements of the Water Framework directive. 2. 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. <i>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.</i> Waste created through the process of construction should be carefully managed and reduced wherever possible. <p>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).</p>
MM046	SD4 4.4.6	<p>Explanation</p> <p>Proposals to apply the relevant elements of sustainable construction frameworks such as the 'Code for Sustainable Homes' and</p>

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		BREEAM could be used to corroborate higher performance.
MM047	SD4 4.4.9 – 4.4.10	<p>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.</p> <p>The British Geological Survey mineral resource map for Gloucestershire suggests that sand, gravel and 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.</p> <p><i>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.</i></p> <p><i>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 policies map and incorporated into the JCS policies 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.</i></p>
MM048	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

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		<p>development scenarios assessed, it could be 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.</p>
MM049	SD4 4.4.17 – 4.4.18	<p>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.</p> <p>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.</p>
MM050	SD6 Green Belt 4.6.2	<p>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.</p>
MM051	4.6.5	<p>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:</p> <ul style="list-style-type: none"> i. Checking the unrestricted sprawl of large built-up areas ii. Preventing nearby towns from merging into one another iii. Assisting in safeguarding the countryside from encroachment iv. Preserving the setting and special character of historic towns.

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		<p>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.</p> <p><i>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</i></p> <p><i>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.</i></p> <p><i>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).</i></p> <p><i>The Green Belt in the JCS area was a significant topic of discussion as part of the JCS examination. Further work was undertaken by the JCS authorities and is set out in the 'Green Belt topic paper' (examination document 142) and the 'Green Belt, Safeguarded Land and Spatial Strategy Update Paper' (examination document 196). The JCS reflects this further work.</i></p>
MM052	SD6 Policy	<p>Policy SD6: Green Belt</p> <p>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. <i>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'</i></p> <p>The boundaries of the reviewed Green Belt are identified on the proposed Changes to the Green Belt Boundary Map (see Appendix 2).</p>

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		<p><i>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</i></p> <p>Gloucestershire Airport, Cheltenham Racecourse, <i>existing waste management facilities in the Green Belt operating in accordance with extant planning permission</i>, and the waste management sites allocated in the Gloucestershire Waste Core Strategy, are designated as developed sites within the green Belt that are acknowledged as having wider benefits where the co-location of facilities can be determined as essential to their use. Notwithstanding this, further development in any of these locations will need to meet the requirements of green Belt policy in the NPPF <i>and/or National Planning Policy for Waste</i>, be in accordance with the development Plan, and not compromise the openness of the Green Belt or increase the risk of urban sprawl.</p> <p><u>Gloucestershire Airport</u></p> <ul style="list-style-type: none"> i. Gloucestershire Airport is shown on Inset Map 1 (see Appendix 3) ii. In the Essential Operational Area of the airport, new structures, buildings or extensions to buildings will only be permitted if they are essential to the operation of the airport and require an airport location iii. Elsewhere within the airport, in the Non-Essential Operational area, business uses which support the airport will be permitted. <p><u>Cheltenham Racecourse</u></p> <p>At Cheltenham Racecourse, as shown on Inset map 2 (Appendix 4), development, including extensions, will only be permitted where:</p> <ul style="list-style-type: none"> i. The development is principally related to the business of the racecourse ii. The development does not extend beyond the confines of the <i>'Racecourse Policy Area'</i> (as show on Inset Map 2). <p><u>Waste Management Sites</u></p> <p>The Gloucestershire Waste Core Strategy allocates sites for waste management <i>recovery</i> facilities, <i>including</i> 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. <i>Future waste development on allocated sites in the green Belt should be in</i></p>

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		<p><i>accordance with development Plan, and be consistent with the NPPF and National Planning policy for Waste.</i></p> <p><u>Safeguarded Areas</u></p> <ul style="list-style-type: none"> 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 <i>at West Cheltenham</i> is also designated as a Development Exclusion <i>an Odour Monitoring</i> zone, where development which is likely to be significantly affected by odours will not be permitted ii. An area of land at north west Cheltenham, as shown on strategic Allocation plan A5, will be safeguarded for longer-term development needs iii. <i>An area of land at Twigworth, as shown on strategic Allocations Plan A1, will be safeguarded for longer-term development needs</i> iv. Safeguarded areas are not allocated for development at the present time. Planning permission for the permanent development of safeguarded land (except for uses that would not be deemed inappropriate within the Green Belt) will only be granted if a future review of the JCS deems the release of this land necessary and appropriate and proposes the development. v. Should any land be released in the safeguarded areas <i>adjacent to Strategic Allocations A1a, A5 and A11</i>, development proposals will be assessed against the following criteria: <ul style="list-style-type: none"> - Development must be well-integrated and planned as part of any urban extension of strategic scale, directly and substantially <i>physically</i> linked to the urban area of Cheltenham <i>or Gloucester</i> - 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 <i>or Gloucester</i> - Development must not lead to a piecemeal, isolated or inefficient use of land in this area.
MM052a	4.6.9	<i>The Green Belt boundary has been altered to accommodate strategic allocations at A1, A1a, A3, A4, A5 and A11 as set out in policy SA1 and on the Key Diagram.</i>
MM053	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. <i>For example,</i>

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		<p><i>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.</i></p> <p>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.</p> <p><i>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).</i></p> <p><i>All such proposals should be in accordance with the Development Plan and be consistent with the NPPF and National Planning Policy for Waste unless very special circumstances can be demonstrated. A lack of suitable and available non-Green Belt sites; the demonstration of particular locational needs such as proximity to main waste arising; and a beneficial operating relationship with existing waste management facilities are matters, along with the relative sensitivity of the green Belt to development in relation to its five purposes should be taken into account when determining whether very special circumstances could exist in relation to future waste management proposals.</i> 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.</p>
MM054	4.6.15 – 4.6.18	<p>Other amendments to the Green Belt boundary</p> <p><u>Shurdington</u> Amendments have been made to the Green Belt boundary at Shurdington, shown on inset map 3 9(appendix 5), to allow limited development and to provide a more appropriate boundary.</p> <p>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.</p>

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		<p><u>West Cheltenham</u> <i>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.</i></p> <p><u>South West Cheltenham</u> 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.</p> <p><i>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.</i></p>
MM055	4.6.21 – 4.6.22 Safeguarded Land	<p>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 <i>has been upgraded in recent years, but still emits odours which have the potential to seriously affect any development that occur nearby.</i></p> <p><i>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.</i></p> <p>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 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</p>

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		<p><i>mitigating works undertaken as part of the development of the allocation.</i></p> <p><i>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.</i></p> <p><i>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.</i></p>
MM056	SD8 Policy	<p>Policy SD8: The Cotswolds Area of Outstanding Natural Beauty (AONB)</p> <p>All development proposals in adjacent to <i>within the setting of</i> the Cotswolds AONB will be required to conserve and, where appropriate, enhance its landscape, scenic beauty, wildlife, cultural heritage and other special qualities. Proposals will be required to be consistent with the policies set out in the Cotswolds AONB Management Plan.</p>
MM057	SD9 Policy no. 5	<p>Policy SD9: Historic Environment</p> <p>Development proposals at Strategic Allocations must have regard to the findings and recommendations of the JCS Historic Environment Assessment (or any subsequent revision) <i>demonstrating that the potential impacts on heritage assets and appropriate mitigation measures have been addressed.</i></p>
MM058	SD10 Policy Number 2	<p>Policy SD10: Biodiversity and Geodiversity</p> <p>This will be achieved by:</p>

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		<ul style="list-style-type: none"> - Ensuring that European protected Species and National protected Species are safeguarded in accordance with the law - 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, <i>thus ensuring that new development both within and surrounding such sites has no unacceptable adverse impacts</i>
MM059	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 <i>at Appendix 8</i> sets out spatial priorities for ecological conservation and enhancement across the county.
MM060	4.10.12	The JCS requires developers to avoid harm to biodiversity or, where this is not possible, to incorporate mitigation measures into the design of developments. <i>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.</i> 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).
MM061	SD11 Policy number 2, 3, 4	<p>Policy SD11: Residential Development</p> <p>2. Housing development will be permitted <i>at sites allocated for housing through the development plan, including Strategic Allocations and allocations in</i> on sites that are allocated for housing by district and neighbourhood plans.</p> <p>3. On sites that are not allocated, housing development and conversions to dwellings will be permitted on previously-developed land in the existing built-up areas of Gloucester City, <i>the Principal Urban Area of</i> Cheltenham and Tewkesbury Town towns, rural service centres and service villages <i>except where otherwise restricted by policies within district plans.</i></p> <p>4. Housing development on other sites will only be permitted where:</p> <ol style="list-style-type: none"> i. It is for affordable housing on a rural exception site in accordance with Policy SD13 or ii. It is infilling within the existing built-up areas of <i>the City of Gloucester cities, the Principal urban Area of Cheltenham, Tewkesbury Borough’s</i> towns and villages <i>except where otherwise restricted by policies within district plans,</i> or
MM062	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

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		accordance with its role as a market town and to rural service centres and service villages. This will include sites allocated in district or neighbourhood plans and additional windfall sites. Windfall development on previously-developed land within cities, towns, rural service centres and service villages is supported in principle, subject to the other policies in this strategy and the relevant district and neighbourhood plans. <i>In addition to this, proposals that will bring empty space back into use are encouraged.</i>
MM063	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.
MM064	4.11.10	The JCS local authorities carry out an annual assessment of land availability, incorporating the SHLA <i>SALA</i> , 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.
MM065a	Background, 4.12.1	It is important that new housing development addresses local needs and contributes to the creation of mixed and balanced communities. This means providing sufficient, good quality housing of the right sizes, types and mix, in the right places, which will be attractive to and meet the identified needs of different groups in society, including families with children, first-time buyers, older people, people with disabilities, and people wishing to build their own homes, <i>and Gypsy, Traveller and Travelling Showpeople communities</i> . Well designed housing should be accessible and adaptable to meet people's changing needs, helping to sustain independent living, and contributing to a low carbon future.
MM065	SD12 4.12.3	Explanation 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 <i>and 2015 JCS update</i> , 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.
MM066	4.12.6	New housing should be designed in a way that enables households, including older people <i>and those with disabilities</i> to live

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		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 <i>or and</i> 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.
MM067	After 4.12.8	<i>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, setting out a criteria-based policy for the consideration of future site allocations and planning applications. The supporting text further sets out the needs for the community arising from the Gypsy and Traveller Accommodation Assessment (GTAA, 2017) at Table C4. For those members of the community who do not meet the definition, the provision of culturally appropriate accommodation will be considered as part of the general housing mix. These needs will be explored further through future work on the district plans.</i>
MM067a	4.12.9	Delivery will be by developers, registered providers, and specialist housing providers working in partnership with local authorities. Where necessary, more detailed and locally-specific policies will be provided in district plans to support the implementation of specific elements of this policy, such as housing for older people, self-build housing or specialist accommodation. <i>Requirements for the location and standards of student accommodation and houses in multiple occupation will also be set out in district plans where appropriate. Through the JCS examination a need not included within the OAHN was identified for 1,500 bed spaces for university accommodation across the JCS area within the plan period. Many of these bed spaces will have already been consented between 2011 and the adoption of the JCS. Provision for the remaining need for C1 class bed spaces will be made through the emerging District Plans.</i>
MM068	4.12.10 – 4.2.12 Delivery	<p>The Gloucestershire <i>updated 2015</i> 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.</p> <p><i>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. 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.</i></p> <p>As well as meeting minimum space standards, housing proposals will need to demonstrate how accessibility and adaptability have</p>

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		<p>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 <i>Following</i> the findings of the Government’s Housing Standards Review, district plans may in future <i>also</i> adopt specific standards for accessibility and adaptability.</p>
MM069	SD13 Background 4.13.2	<p>There are three main classifications of affordable housing <i>as set out in Annex 2 of the NPPF</i>:</p> <p>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.</p> <ul style="list-style-type: none"> • Social rented housing is owned by local authorities and private registered providers (as defined in Section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. • Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable). • Intermediate housing is housing for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the affordable housing definition above. These can include shared equity (shared ownership and equity loans), other low-cost housing for sale and intermediate rent, but not affordable rented housing. <p><i>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.</i></p>
MM070	SD13 Policy Number 1, 2, 6, 7, 9 & 10	<p>The JCS local authorities will seek through negotiation to deliver new affordable housing as follows:</p> <p>1. On sites of 5-9 dwellings (or covering 0.2 hectares or more of land), 20% affordable housing will be sought 2. On sites of 10 or more dwellings (or covering 0.4 hectares or more of land), 40% affordable housing will be sought</p> <p>1. The JCS authorities will seek, through negotiation, <i>for new development</i> to deliver new affordable housing on a sliding scale</p>

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		<p>approach as set out below:</p> <ul style="list-style-type: none"> <i>i. Within the Strategic Allocation sites a minimum of 35% affordable housing will be sought.</i> <i>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.</i> <i>iii. On sites of 10 dwellings or less, which have a maximum combined gross floor space of no more than 1000sqm, no contribution towards affordable housing will be sought.</i> <i>iv. Notwithstanding the above, affordable housing policy for sites of 10 dwellings or less may be applied under policies set out within district plans.</i> <p>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.</p> <p>6. Provision should be made, <i>where possible</i>, 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.</p> <p>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 settlement both functionally and in terms of design.</p> <p>9. If a development cannot deliver the full affordable housing requirement, a viability assessment, <i>conforming to an agreed methodology</i>, in accordance with Policy INF7 will be required. <i>Viability assessments will be published in full prior to determination for all non-policy compliant schemes except in exceptional circumstances when it can be proven that publication of certain specific information would harm the commercial confidentiality of the developer to no public benefit. Where necessary the JCS authorities will arrange for them to be independently appraised at the expense of the applicant.</i></p>

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		<p><i>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.</i></p> <p>For the purpose of This policy, residential units are dwelling houses applies to dwellings (<i>as defined by</i> 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</p> <p>Provision should be made, <i>where possible</i>, 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.</p> <p>Rural exception sites 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.</p> <p>If a development cannot deliver the full affordable housing requirement, a viability assessment, <i>conforming to an agreed methodology</i>, in accordance with Policy INF7 will be required. <i>Viability assessments will be published in full prior to determination for all non-policy compliant schemes except in exceptional circumstances when it can be proven that publication of certain specific information would cause harm to the public interest to an extent that is not outweighed by the benefits of disclosure. Where necessary the JCS authorities will arrange for them to be independently appraised at the expense of the applicant.</i></p> <p><i>The councils consider that information submitted as a part of, and in support of a viability assessment should be treated transparently and be available for wider scrutiny. In submitting information, applicants should do so in the knowledge that this will be made publicly available alongside other application documents.</i></p> <p><i>The councils will allow for exceptions to this in very limited circumstances and only in the event that there is a convincing case that disclosure of an element of a viability assessment would cause harm to the public interest to an extent that is not outweighed by the benefits of disclosure. Given the significant benefits associated with the availability of information to the public as a part of the decision</i></p>

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		<p><i>making process, and the other factors identified above, the councils anticipate that there would be very few exceptions.</i></p> <p><i>If an applicant wishes to make a case for an exceptional circumstance in relation to an element of their assessment, they should provide a full justification as to the extent to which disclosure of a specific piece of information would cause an ‘adverse effect’ and harm to the public interest that is not outweighed by the benefits of disclosure. The council will consider this carefully, with reference to the ‘adverse effect’ and overriding ‘public interest’ tests in the EIR, as well as the specific circumstances of the case.</i></p> <p><i>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.</i></p>
MM070a	4.13.3	<p>There is sometimes confusion as to whether these units fall into use class defined as a residential institution (C2) or a dwelling house (C3). Our approach is that development which creates living spaces that retain the essential characteristics of a self-contained dwelling, even if some care is provided, will be subject to the affordable housing policy. <i>Need for C3 ‘special’ or ‘extra care’ accommodation has been addressed through the JCS OAHN. Through the examination, need for 1,558 C2 ‘residential institution’ bed spaces were identified for the plan period across the JCS area. Many of these bed spaces will have already been consented between 2011 and the adoption of the JCS. Provision for the remaining need for C2 ‘residential institution’ bed spaces will be made through the emerging District Plans.</i></p>
MM071	4.13.4 onwards	<p>The Gloucestershire SHMA 2014, <i>updated in September 2015</i>, 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:</p> <ul style="list-style-type: none"> • Planning commitments at the base date of the LTBHM model (2013) • The composition (by site size) of expected housing delivery over the plan period, based on Policy SP2. This includes assumptions about district capacity and windfall development that are informed by assessments of land availability and past trends in housing delivery. • An assessment of the viability of the JCS affordable housing policy and of the JCS as a whole, taking account of the cumulative requirements of all policies <i>and the potential for Section 106 and Community Infrastructure Levy contributions.</i>

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		<p>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. <i>The latest evidence from the 2015 SHMA, which emerged through the JCS examination, determined that there is a need for 638 affordable houses per year across the JCS area.</i> 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.</p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>The Strategic Allocations in the JCS present altogether different viability considerations from the rest of the area. The latest viability work evidences that, for Strategic Allocations, a 35% affordable housing contribution could be viable. However, it is recognised that each of these allocations will have their own individual deliverability and viability challenges. Therefore there will need to be balance between infrastructure provision and affordable housing in the context of deliverability. Some development proposals on the Strategic Allocations may be able to achieve greater than 35% affordable housing, while others may require a greater focus on infrastructure provision to deliver the site leading to a lower affordable housing contribution. Each proposal will be submitted with a detailed viability</i></p>

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		<p><i>evidence to determine the appropriate balance.</i></p> <p>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%.</p> <p><i>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. If the 5 unit threshold is applied, payment of affordable housing and tariff style contributions on developments of 6-10 units should be sought as a cash payment only.-There are areas within the JCS that would fall under this rural area designation, such as the Cotswold AONB, and therefore each authority may choose to apply a lower threshold where appropriate. Further detail and policies may be provided through the district-level plans.</i></p> <p>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.</p> <p><i>As part of the mix of affordable housing, developments should also consider the needs of specialist accommodation and how a site could contribute towards delivering them. This may include provision for affordable Gypsy, Traveller and Travelling Showpeople pitches and/or plots in line with any needs identified through the latest Gypsy and Traveller Accommodation Assessment and the SHMA. This would include the needs of these communities who are identified either within or outside the Government’s definition set out through the Planning Policy for Traveller Sites.</i></p>
MM072	<p>Policy SD14</p> <p>4.14.1, 2 & 3</p>	<p>‘Planning Policy for Traveller Sites’ (<i>PPTS</i>) was <i>first</i> published by the Government in March 2012 and aligns <i>aligned</i> 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. <i>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</i></p>

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		<p><i>dependants educational or health needs or old age, are defined as Travellers in planning terms. For the purposes of establishing the need for sites and yards in light of the change to the definition and to identify the resulting needs of both travelling households and non-travelling households, an up to date Gypsy and Traveller Accommodation Assessment (GTAA) was completed in March 2017, replacing the Gloucestershire Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTTSAA, 2013). This update provides a robust and credible evidence base to inform plan making.</i></p> <p>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 <i>is home to the majority of communities within the JCS area,</i> close to the urban areas of Gloucester and Cheltenham.</p> <p>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. <i>Policy SD14 sets out criteria to guide site allocations in district plans and to help determine planning applications for Gypsy, Traveller and Travelling Showpeople communities. The supporting text further details the number of pitches and plots, identified through the GTAA (2017), that are required between 2016 and 2031. Policy SD12 further provides a hook to ensure the needs of those members of the community who do not meet the planning definition are addressed through district plans. Site allocations to provide for this need will be considered through the district plans.</i></p>
MM073	SD14 Policy	<p>Policy SD14: Gypsies, Travellers and Travelling Showpeople</p> <ol style="list-style-type: none"> 1. <i>Existing permanent residential and transit Gypsy, Traveller and Travelling Showpeople sites, identified on the policies map, will be protected from development to alternative uses.</i> 2. All <i>Proposals for new permanent and temporary, residential and transit</i> Gypsy, Traveller and Travelling Showpeople sites will be assessed against the following criteria: <ul style="list-style-type: none"> 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.

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		<p>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<i>must</i> not have an unacceptable impact on the character and appearance of the landscape and the amenity of neighbouring properties, and is <i>should be</i> sensitively designed to mitigate any impact on its surroundings.</p>																																																										
MM074	Explanation 4.14.4	<p>The Gloucestershire <i>GTAA 2017</i> sets out the need for new pitches/plots resulting from existing traveller communities in Gloucestershire <i>between a new base date of 2016</i> 2013 and <i>the plan end date of</i> 2031. Within the JCS area, the assessment sets out the requirement for provision of 151 permanent pitches for Gypsies and Travellers (as shown in Table C4 below). Of these, 147 pitches relate to communities that currently reside in Tewkesbury Borough. The assessment further sets out a requirement for 36 permanent plots for Travelling Showpeople, relating to communities that currently reside in Gloucester City and Tewkesbury Borough. <i>The assessment shows that within the JCS area, there is a need for at least 83 pitches for Gypsies and Travellers, and 40 plots for Travelling Showpeople, regardless of their status under the planning definition. The breakdown of needs for the different communities, and by those who meet the definition, those who do not and those where their status is unknown, is set out in Table C4 below.</i></p>																																																										
MM075	Table C4 and C5	<p>Table C4 – Permanent Gypsy and Traveller Pitch Requirements in the JCS area</p> <table border="1"> <thead> <tr> <th rowspan="2">Local Authority</th> <th colspan="2">2013-2017</th> <th colspan="2">2018-2022</th> <th colspan="2">2023-2027</th> <th colspan="2">2028-2031</th> <th rowspan="2">Total</th> </tr> <tr> <th>Public</th> <th>Private</th> <th>Public</th> <th>Private</th> <th>Public</th> <th>Private</th> <th>Public</th> <th>Private</th> </tr> </thead> <tbody> <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> </tbody> </table>	Local Authority	2013-2017		2018-2022		2023-2027		2028-2031		Total	Public	Private	Public	Private	Public	Private	Public	Private	Cheltenham	0	1	0	0	0	0	0	1	2	Gloucester	0	1	0	0	0	0	0	1	2	Tewkesbury	20	44	12	15	13	16	12	15	147	Total	20	46	12	15	13	16	12	17	151
Local Authority	2013-2017			2018-2022		2023-2027		2028-2031		Total																																																		
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		Sub-Total	18	8	0	26	3	4	0	7	3	4	0	7	40
MM076	4.14.5, 4.14.6	<p><i>The Housing Act 1985 requires Local Authorities to assess and plan for the needs of all communities residing in their areas. With this in mind, the JCS provides hooks for the district plans to consider site allocations for all members of the traveller community through a combination of policies SD14 'Gypsies, Travellers and Travelling Showpeople' and SD12 'Housing Mix and Standards'. Furthermore, the affordable requirement for this community, identified as 'public' in the GTAA, along with other forms of affordable provision, will be addressed as part of the overall affordable housing requirement as set out in Policy SD13 'Affordable Housing'.</i></p> <p>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.<i>The GTTSAA 2013 stated that if transit pitches are considered necessary, a transit site of at least 10 pitches should be provided within Gloucestershire. Alternatively, the report recommended the use of a formal 'temporary toleration' policy, to meet the needs of Gypsies and Travellers moving through the County, without the need to establish a formal transit site, which can often be difficult to manage and maintain. Since the GTTSAA was published in 2013, two transit sites have been granted planning permission in Gloucestershire, one at Morton Valence in Stroud District for six pitches and one at Minsterworth for eight pitches; 14 transit pitches in total. The suggested need arising from the GTTSAA has therefore been exceeded. However, the 2017 GTAA presents alternative options to further meet any future need in any event.</i></p> <p>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.</p> <p>In terms of the JCs, significant development will be coming forward through the Strategic Allocation and urban extensions and the</p>													

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		<p>need for affordable accommodation for all members of the community will 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.</p> <p>'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.</p>
MM077	Delivery 4.14.8 & 9	<p>The purpose of Policy SD14 is to set <i>provide a criteria-based policy to be used in the assessment of potential site allocations and planning applications. Supporting text sets out the accommodation needs of the community and that site allocations to provide for these needs will be considered through district plans.</i> Policy SA1 provides detail with regard to site provision through the JCS.</p> <p>In order to bring forward adequate numbers of sites for Gypsies, Travellers and Travelling Showpeople communities, it will 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 through the lower level district plans.</p>
MM078	Policy SD15 Policy number 3	Proposals for development at Strategic Allocations, and other development proposals <i>as appropriate</i> at the discretion of the local planning authority , must be accompanied by a health impact assessment.
MM079	Delivery After 4.15.8	<i>Applications which may require health impact assessments should first be screened to determine whether it is necessary for a full assessment to take place</i>
MM080	Part 5 Policy INF1 and INF 2 5.2.2 - 5.2.5	<p>INF1 and INF2 – TRANSPORT NETWORK</p> <p>Background 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 –</p>

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		<p>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 <i>through its policies on design and infrastructure</i> (see, for example, criterion vii of Policy SD5). This policy contributes to the delivery of <i>the</i> strategy's ambitions and strategic objectives including:</p> <table border="1" data-bbox="586 485 1534 786"> <thead> <tr> <th data-bbox="586 485 913 520">Ambition</th> <th data-bbox="913 485 1534 520">Strategic Objective</th> </tr> </thead> <tbody> <tr> <td data-bbox="586 520 913 595">A thriving economy</td> <td data-bbox="913 520 1534 595">1)Building a strong and competitive urban economy 2)Ensuring vitality of town centres</td> </tr> <tr> <td data-bbox="586 595 913 710">A sustainable natural and built environment</td> <td data-bbox="913 595 1534 710">4)Conserving and enhancing the environment 5)Delivery excellent design in new developments 6)Meeting the challenges of climate change</td> </tr> <tr> <td data-bbox="586 710 913 786">A healthy, safe and inclusive community</td> <td data-bbox="913 710 1534 786">7)Promoting sustainable transport 9)promoting healthy communities</td> </tr> </tbody> </table> <p>The preparation and implementation of transport <i>strategy is primarily a matter for the Local Transport Plan</i> 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.</p> <p>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, <i>along with the JCS' transport implementation strategy (TIS),</i> need to be read together. <i>The LTP is the key strategy for the delivery of essential transport infrastructure to support the delivery of growth identified through the JCS.</i> 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. <i>The Transport Implementation Strategy sits alongside the JCS and provides important explanation and guidance on the interpretation of policies relevant to the provision of transport in the JCS.</i></p> <p>TheHighways England Agency, an executive agency of the Department for Transport, <i>is a government company that is charged with operating, maintaining and improving</i> manages and maintains the strategic road network <i>in the area</i> including the M5, M50, A40, A46 and A417. The Highways Agency also<i>Highways England also</i> contributes to local transport policy formulation and implementation by</p>	Ambition	Strategic Objective	A thriving economy	1)Building a strong and competitive urban economy 2)Ensuring vitality of town centres	A sustainable natural and built environment	4)Conserving and enhancing the environment 5)Delivery excellent design in new developments 6)Meeting the challenges of climate change	A healthy, safe and inclusive community	7)Promoting sustainable transport 9)promoting healthy communities
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		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.
MM081	Policy INF1 and INF 2	<p>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.</p> <p>Policy INF1: Access to the Transport Network</p> <ol style="list-style-type: none"> 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: <ol style="list-style-type: none"> a. The development provides safe vehicular access to the highway network 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 this context relates to highway junctions no longer operating within their design capacity c. Any severe increase in congestion likely to arise from development must be mitigated to ensure highway junctions operate within their design capacity, and 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 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. <p>This policy contributes towards achieving Objectives 1, 2, 3, 6, 7 and 9.</p> <p>Policy INF2 – Safety and Efficiency of the Transport Network</p> <ol style="list-style-type: none"> 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: <ol style="list-style-type: none"> i. Congestion at network pinch points ii. Travel safety within the vicinity of the development, and iii. Noise and/or atmospheric pollution within the vicinity of the development. 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

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		<p style="text-align: center;">Highway Authority.</p> <p>This policy contributes towards achieving Objectives 4, 5, 6, 7 and 9</p> <p><i>Policy INF1: Transport Network</i></p> <ol style="list-style-type: none"> 1. <i>Developers should provide safe and accessible connections to the transport network to enable travel choice for residents and commuters. All proposals should ensure that:</i> <ol style="list-style-type: none"> a. <i>Safe and efficient access to the highway network is provided for all transport modes</i> b. <i>Connections are provided, where appropriate, to existing walking, cycling and passenger transport networks and should be designed to encourage maximum potential use</i> c. <i>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</i> 2. <i>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.</i> 3. <i>Developers will be required to assess the impact of proposals on the transport network through a Transport Assessment. The assessment will demonstrate the impact, including cumulative impacts, of the prospective development on:</i> <ol style="list-style-type: none"> a. <i>Congestion on the transport network</i> b. <i>Travel safety within the zone of influence of the development</i> c. <i>Noise and/or atmospheric pollution within the zone of influence of the development</i> 4. <i>Where appropriate the local planning authority may require applications to be accompanied by a Travel Plan that has full regard to the criteria set out in the NPPF.</i>

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		<i>This policy contributes towards achieving Objectives 1, 2, 3 4, 5, 6, 7 and 9.</i>
MM082	Explanation 5.2.7 - 5.2.8	<p>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 <i>in regards to masterplanning, design and layout.</i></p> <p>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.</p> <p><i>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.</i></p>
MM083	Delivery 5.2.11	<p>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.</p> <p>• Local Developer Guide 2013 provides a brief overview for developers on the type of infrastructure considerations</p>

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		<p>that should be taken into account when making a planning application.</p> <ul style="list-style-type: none"> • <i>The Transport Implementation Strategy (TIS) This strategy sits alongside the JCS providing important explanation and guidance on implementation for decision makers interpreting policies in the JCS, particularly INF1 and transport elements of policies SD5 (design) and SA1 (strategic allocations).</i> • Local Transport Plan 2012-2026 2015-2031 – provides an overview of the strategic context of the transport network within the county, <i>setting out strategy, policies and investment priorities. The LTP is a living document which will be updated and amended to reflect changing policy at the national and local level. This would enable the LTP to be responsive to any significant transport infrastructure needs that may arise through the JCS plan period, including future reviews.</i> • Local Developer Guide 2013 – <i>provides a brief overview for developers on the type of infrastructure considerations that should be taken into account when making a planning application</i>
MM084	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. <i>As part of its ongoing commitment to reducing flood risk within the county all participating councils will, subject to meeting other national and local policy objectives, support any development that contributes physically or financially to the delivery of any proposed flood alleviation plans or schemes that have a wider benefit to communities at risk within the Plan area.</i>
MM084a	Policy INF3	<i>iii.</i> 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 <i>updates to</i> modelling <i>and climate change data</i> 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
MM085	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 forms of flood risk: fluvial (rivers), tidal (sea), surface water, groundwater, sewers and impounded water bodies (reservoirs

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		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.
MM085a	After 5.3.6	<i>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.</i>
MM086	5.3.7 Bullet points 4 and 5	<ul style="list-style-type: none"> • 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. <i>For more information see the LLFA guidance on SuDS</i> • <i>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.</i> • <i>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.</i> • Considering <i>and acting on</i> the cumulative impact of existing and new development, <i>for example:</i> <i>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.</i>
MM087	Delivery After 5.3.15	<i>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'</i>
MM088	Policy INF4 Explanation	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

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	5.4.6 & 7	<p>River Severn and its washlands to the west. <i>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.</i></p> <p>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.</p> <p>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. <i>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.</i> 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]). <i>The JCS authorities will work together with key stakeholders, such as Natural England and the Environment Agency, to develop management and mitigation packages for important green and ecological networks and to discuss how future development can contribute to this.</i> 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.</p>
MM089	Delivery After 5.4.12	<p><i>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.</i></p>
MM090	Policy INF5 Delivery 5.5.6	<p>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. <i>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.</i></p>

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MM091	Policy INF6 Background 5.6.3 – 5.6.5	<p>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 farm development in particular has been perceived as visually intrusive, although generally wind generation is supported by the vast majority of the population (NOP DTI commissioned survey 2006).</p> <p>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.</p> <p>This policy <i>Policy INF6</i> 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. <i>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.</i></p>
MM092 NOT USED		
MM093	INF6 Policy Number 1 point iii.	<p>Policy INF6: Renewable Energy/Low Carbon Energy Development</p> <p>1. Proposals for the generation of energy from renewable resources, or low carbon energy development <i>(with the exception of wind turbines)</i>, 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:</p> <p style="padding-left: 40px;">iii. Any unacceptable adverse impacts on users and residents of the local area, including emissions, noise, odour and visual amenity, including shadow flicker.</p>
MM094	Explanation 5.6.8	<p>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.</p>

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MM095	<p>Policy INF7 Background 5.7.1</p>	<p>Government says that <i>'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.'</i> (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.</p>
MM096	Policy	<p>Policy INF7: Infrastructure Delivery</p> <ol style="list-style-type: none"> 1. Where need is <i>infrastructure requirements are</i> generated as a result of individual site proposals and/or as a consequence of <i>having regard to</i> 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 <i>been</i> given, where appropriate, to implementing the requirements of the Joint Core Strategy Infrastructure Delivery Plan. 2. Where need for additional infrastructure and services and/or impacts on existing infrastructure and services is expected to arise, the local planning authority will seek to secure appropriate and proportionate infrastructure provision in respect of <i>which is necessary, directly related, and fairly and reasonably related to the scale and kind of the development proposal, including:</i> <ol style="list-style-type: none"> i. Affordable housing <i>Broadband infrastructure</i> ii. Climate change mitigation/adaptation iii. Community <i>and cultural</i> facilities <i>and initiatives</i> iv. Early Years and Education v. Health and well-being facilities <i>and sport, recreation and leisure facilities</i> vi. The highway network, traffic management, sustainable transport and disabled people's access vii. Protection of cultural and heritage assets and the potential for their enhancement viii. Protection of environmental assets and the potential for their enhancement ix. Provision of Green Infrastructure including open space x. Public realm, and

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		<p>xi. Safety and security including emergency services xii. Flood risk management infrastructure</p> <p>This list <i>of potential infrastructure items</i> is neither exhaustive, <i>sequential</i> nor are its elements mutually exclusive.</p>
MM097	Explanation 5.7.4	<p>It follows, from the preceding paragraphs and from the background to this policy, that the provision of infrastructure is a matter of critical importance in the consideration and determination of applications for planning permission. Existing infrastructure may have sufficient capacity to absorb some if not all the envisaged impact of new development. However, in many instances this may not be the case. Furthermore, where additional provision is needed, the JCS authorities acknowledge that it may not be practical and/or economically viable to require a developer to make provision for all required infrastructure identified with their proposal at the outset. Consequently a phased approach to provision and maintenance, <i>that is</i> fully justified within the <i>planning</i> 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' <i>include development of all scales and types</i>. Policy INF7 are not necessarily subject to considerations of scale.</p>
MM098	Delivery 5.7.5	<p>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. <i>This includes the Gloucestershire County Council 'Local Developer Guide: Infrastructure & Services with New Development' (adopted February 2013)</i>. There are several policies elsewhere in the JCS that directly or indirectly relate to the provision of infrastructure. including all those in part 5 Infrastructure Policies. Prospective Developers should read the JCS as a whole.</p>
MM099	Policy INF8 Policy	<p>Policy INF8: Developer Contributions</p> <ol style="list-style-type: none"> <li data-bbox="584 1027 2056 1166">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. <i>Financial contributions will be sought through the S106 and CIL mechanisms as appropriate.</i> <li data-bbox="584 1203 2056 1386">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 independently appraised. <i>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</i>

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		<i>will arrange for them to be independently appraised at the expense of the applicant.</i>
MM100	After 5.8.5	<i>Publication of viability assessments will be required for non-compliant schemes in line with best practice and for reasons of transparency. Publication of such assessments will allow communities to assess the robustness of the appraisal and empower decision makers. Publication of viability assessments will be required in full for non-compliant schemes except in exceptional circumstances when it can be proven that publication of certain specific information would harm the commercial confidentiality of the developer to no public benefit.</i>
MM101	Policy SA1 Background 6.1.1.- 6.1.3	<p>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.</p> <p>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.</p> <p>The Strategic Allocations Report details the process by which the approximate capacity of the sites in Table SA1 was calculated, <i>except for allocations at Twigworth, Winnycroft and West Cheltenham. The capacity of these sites has been informed through the JCS evidence base as it progressed after submission.</i> 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.</p>
MM102	Policy	<p>Policy SA1: Strategic Allocations Policy</p> <ol style="list-style-type: none"> <li data-bbox="591 1177 2047 1235">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. <li data-bbox="591 1273 2047 1367">2. The Strategic Allocations are listed in Table SA1 and delineated on Plans A1-A119 below and are marked on the <i>policies map proposed submission policies map</i>. The red lines on Plans A1–A119 (not including <i>A2, A6, A7 and A8 which have been removed from the JCS</i>) mark the boundaries of the allocations and are separately and collectively part of this policy.

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		<p>3. <i>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.</i></p> <p>4. <i>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.</i></p> <p>5. Proposals must be accompanied by a comprehensive masterplan for the <i>entire</i> Strategic Allocation. This should demonstrate how new development will integrate with and complement its surroundings in an appropriate manner, in accordance with Policy SD5. <i>The JCS authorities will be flexible in considering different approaches to achieving a comprehensive masterplan providing that proposals still take fully into account the development and infrastructure needs of the wider allocation and demonstrate that it would not prejudice the sustainable delivery of the entire allocation.</i></p> <p>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.</p> <p>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 <i>and relevant national guidance</i> Paragraph 77 whilst delivering the scale and distribution of development required by this policy. This is in addition to the requirements of Policy INF4.</p> <p>7. Development proposals should enable a comprehensive scheme to be delivered across the developable area within each Strategic Allocation. <i>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.</i> 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.</p>

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		<p><i>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.</i></p> <p>This policy contributes towards achieving Objectives 1, 2, 4, 6, 7, 8 and 9</p>																																				
MM103	Table SA 1	<p>Table SA 1</p> <table border="1" data-bbox="869 539 1765 1351"> <thead> <tr> <th data-bbox="869 539 1227 738"></th> <th data-bbox="1227 539 1400 738">Indicative Housing Site Total</th> <th data-bbox="1400 539 1592 738">Indicative Housing to be delivered up to 2031</th> <th data-bbox="1592 539 1765 738">Hectares of Employment Land to be delivered up to 2031</th> </tr> </thead> <tbody> <tr> <td data-bbox="869 738 1227 799">A1 Innsworth</td> <td data-bbox="1227 738 1400 799">1300 1250</td> <td data-bbox="1400 738 1592 799">1300 1250</td> <td data-bbox="1592 738 1765 799">9.1</td> </tr> <tr> <td data-bbox="869 799 1227 860"><i>A1a Twigworth</i></td> <td data-bbox="1227 799 1400 860"><i>995</i></td> <td data-bbox="1400 799 1592 860"><i>995</i></td> <td data-bbox="1592 799 1765 860">N/A</td> </tr> <tr> <td data-bbox="869 860 1227 920">A2 North Churchdown</td> <td data-bbox="1227 860 1400 920">532</td> <td data-bbox="1400 860 1592 920">532</td> <td data-bbox="1592 860 1765 920">N/A</td> </tr> <tr> <td data-bbox="869 920 1227 981">A3 South Churchdown</td> <td data-bbox="1227 920 1400 981">1100 868</td> <td data-bbox="1400 920 1592 981">1100 868</td> <td data-bbox="1592 920 1765 981">17.4</td> </tr> <tr> <td data-bbox="869 981 1227 1042">A4 North Brockworth</td> <td data-bbox="1227 981 1400 1042">1500</td> <td data-bbox="1400 981 1592 1042">1500</td> <td data-bbox="1592 981 1765 1042">3 N/A</td> </tr> <tr> <td data-bbox="869 1042 1227 1102">A5 North West Cheltenham</td> <td data-bbox="1227 1042 1400 1102">4285 4785</td> <td data-bbox="1400 1042 1592 1102">4285 4785</td> <td data-bbox="1592 1042 1765 1102">23.4</td> </tr> <tr> <td data-bbox="869 1102 1227 1192">A6 South Cheltenham Leckhampton</td> <td data-bbox="1227 1102 1400 1192">1124</td> <td data-bbox="1400 1102 1592 1192">1124</td> <td data-bbox="1592 1102 1765 1192">N/A</td> </tr> <tr> <td data-bbox="869 1192 1227 1351">A8 MoD Site at Ashchurch</td> <td data-bbox="1227 1192 1400 1351">2726 (*2125 up to 2031)</td> <td data-bbox="1400 1192 1592 1351">2125</td> <td data-bbox="1592 1192 1765 1351">20* *(this is replacement of existing</td> </tr> </tbody> </table>		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	<i>A1a Twigworth</i>	<i>995</i>	<i>995</i>	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* *(this is replacement of existing
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						use}														
			A9 Ashchurch	N/A	N/A	14.3														
			<i>A10 Winneycroft</i>	<i>620</i>	<i>620</i>	<i>N/A</i>														
			<i>A11 West Cheltenham</i>	<i>1100</i>	<i>1100</i>	<i>45</i>														
			Total	13,993 10,900	12,284 10,900	64.2 112.2														
MM104	6.1.4	<p>Proposals for development at Strategic Allocations must have regard to all relevant planning policies in the plan as well as Policy SA1, <i>including site specific policies A1-A11</i>. The JCS identifies a number of specific requirements for Strategic Allocations and other major developments, which include the following:</p> <table border="1" data-bbox="884 737 1747 1390"> <thead> <tr> <th data-bbox="884 737 1003 770">Policy</th> <th data-bbox="1003 737 1747 770">Requirement</th> </tr> </thead> <tbody> <tr> <td data-bbox="884 770 1003 810">SD3</td> <td data-bbox="1003 770 1747 810">The provision of new local centres of an appropriate scale to provide for the everyday needs of new communities.</td> </tr> <tr> <td data-bbox="884 810 1003 850">SD4</td> <td data-bbox="1003 810 1747 850">Major planning applications must be accompanied by a waste minimisation statement and an Energy Statement.</td> </tr> <tr> <td data-bbox="884 850 1003 890">SD5</td> <td data-bbox="1003 850 1747 890">Policy SD5 sets out design requirements including masterplanning. Masterplans are required for all Strategic Allocations by Policy SA1.</td> </tr> <tr> <td data-bbox="884 890 1003 930">SD7</td> <td data-bbox="1003 890 1747 930">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 data-bbox="884 930 1003 970">SD9</td> <td data-bbox="1003 930 1747 970">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 data-bbox="884 970 1003 1010">SD14</td> <td data-bbox="1003 970 1747 1010">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</td> </tr> </tbody> </table>					Policy	Requirement	SD3	The provision of new local centres of an appropriate scale to provide for the everyday needs of new communities.	SD4	Major planning applications must be accompanied by a waste minimisation statement and an Energy Statement.	SD5	Policy SD5 sets out design requirements including masterplanning. Masterplans are required for all Strategic Allocations by Policy SA1.	SD7	Planning applications will be supported by a Landscape and Visual Impact Assessment where, at the discretion of the local planning authority, one is required.	SD9	Development proposals at Strategic Allocations must have regard to the findings and recommendations of the JCS Historic Environment Assessment (or any subsequent revision).	SD14	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
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			<table border="1"> <tr> <td data-bbox="884 304 1003 424"></td> <td data-bbox="1003 304 2051 424">locations.</td> </tr> <tr> <td data-bbox="884 424 1003 507">SD15</td> <td data-bbox="1003 424 2051 507">Proposals for development at Strategic Allocations must be accompanied by a health impact assessment.</td> </tr> <tr> <td data-bbox="884 507 1003 651">INF3</td> <td data-bbox="1003 507 2051 651">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.</td> </tr> <tr> <td data-bbox="884 651 1003 756">INF4</td> <td data-bbox="1003 651 2051 756">Development at Strategic Allocations will be required to deliver connectivity through the site linking urban areas with the wider rural hinterland.</td> </tr> </table>		locations.	SD15	Proposals for development at Strategic Allocations must be accompanied by a health impact assessment.	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.	INF4	Development at Strategic Allocations will be required to deliver connectivity through the site linking urban areas with the wider rural hinterland.
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MM105	Strategic Allocations Information	<p data-bbox="571 823 2051 858">Strategic Allocations <i>Policies & Maps</i> Information</p> <p data-bbox="571 890 2051 925">Red line plans and descriptions</p> <p data-bbox="571 957 2051 1085">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 <i>development or</i> 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.</p> <p data-bbox="571 1117 2051 1181"><i>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.</i></p> <p data-bbox="571 1212 2051 1378">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. <i>Furthermore, in order to ensure the sustainable development of the allocations, a site specific policy has been prepared which sets out the key principles and infrastructure requirements.</i></p>									

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MM106	Plan A1 Innsworth	<p><i>POLICY A1 - Innsworth & Twigworth</i></p> <p><i>The Strategic Allocation identified at Innsworth & Twigworth (as shown on Policies map Plan A1) will be expected to deliver:</i></p> <ul style="list-style-type: none"> <i>i. Approximately 2,295 new homes</i> <i>ii. Approximately 9 hectares of employment generating land</i> <i>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</i> <i>iv. New primary and secondary education schools and facilities</i> <i>v. A green infrastructure network of approximately 100 hectares, corresponding with flood zones 2 and 3.</i> <i>vi. Protection to key biodiversity assets, including a new nature reserve with the green infrastructure area to support the restoration of the SSSI and improve the ecology of the area to support restoration of the SSSI, improve the ecology of the area and contribute to water quality enhancements.</i> <i>vii. Adequate flood risk management across the site and ensure that all more vulnerable development is located wholly within flood zone 1. This includes measures to reduce flood risk downstream through increasing storage capacity.</i> <i>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.</i> <i>ix. A layout and form of development that respects the landscape character as well as the character, significance and setting of heritage assets and the historic landscape.</i> <i>x. A layout and form that integrates, where appropriate, important hedgerows within the development.</i> <i>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.</i> <i>xii. Primary vehicle accesses from A38, Innsworth Lane and explore the potential for a new main junction onto the A40 to the south of the site.</i> <i>xiii. The potential for a highway link through both the Innsworth and Twigworth sites linking the A38 and A40.</i> <i>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.</i> <i>xv. High quality public transport facilities and connections within and adjacent to the site</i> <i>xvi. Safe, easy and convenient pedestrian and cycle links within the site and to key centres, providing segregated links where practical.</i>
MM107	Plan A1 Innsworth	<p>Plan A1 – Innsworth & Twigworth</p> <p>This Strategic Allocation lies to the north of Gloucester and is bounded by Innsworth Lane and Innsworth Technology Park to the south,</p>

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		<p>open countryside to the west, <i>Down Hatherley Lane</i> 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 <i>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</i> A Site of Special Scientific Interest. is situated within the Strategic Allocation to the north west of the site.</p>
MM108	Plan A2 North Churchdown	<p>Plan A2 – North Churchdown</p> <p>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.</p>
MM109	Plan A3 South Churchdown	<p><i>POLICY A3 - South Churchdown</i></p> <p><i>The Strategic Allocation identified at South Churchdown (as shown on Policies map Plan A3) will be expected to deliver:</i></p> <ul style="list-style-type: none"> <i>i. Approximately 1,100 new homes.</i> <i>ii. Approximately 17 hectares of employment generating land.</i> <i>iii. Provision of an appropriate scale of retail, healthcare and community facilities to meet the needs of the new community.</i> <i>iv. Contribution to primary and secondary education schools and facilities</i> <i>v. A green infrastructure network of approximately 50 hectares, including protection and enhancement of visual linkages from Tinker’s Hill and Churchdown through to Innsworth Ditch, and the safeguarding of Pirton Brake ancient woodland and buffer strip along the railway line. Habitat creation and management should complement the reserve at Horsbere flood management scheme to the immediate south of the Railway line and contribute to water quality enhancements.</i> <i>vi. A landscape buffer along the route of the A40 and the railway line including the protection of views from Tinkers Hill/Churchdown Hill.</i> <i>vii. Protection to key biodiversity assets, including Innsworth Ditch and the safeguarding of the ponds and associated biodiversity at Pirton Court.</i> <i>viii. Adequate flood risk management across the site and ensure that all more vulnerable development is located wholly within flood zone 1.</i> <i>ix. A layout and form of development that respects the landscape character, as well as the character significance and setting of heritage assets, and separation of the villages Churchdown, Innsworth, Longlevens and Elmbridge.</i>

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		<ul style="list-style-type: none"> x. <i>A layout and form of development that respects the character and setting of Pirton Farmhouse and Barn.</i> xi. <i>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.</i> xii. <i>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.</i> xiii. <i>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.</i> xiv. <i>High quality public transport facilities and connections within and adjacent to the site</i> xv. <i>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.</i> xvi. <i>Safeguard land for an extension to the planned park and ride facility at Elmbridge.</i>
MM110	Plan A4 – North Brockworth	<p><i>POLICY A4 - North Brockworth</i></p> <p><i>The Strategic Allocation identified at North Brockworth (as shown on Policies map Plan A4) will be expected to deliver:</i></p> <ul style="list-style-type: none"> i. <i>Approximately 1,500 new homes.</i> ii. <i>Approximately 3 hectares of employment generating land.</i> iii. <i>Provision of an appropriate scale of retail, healthcare and community facilities to meet the needs of the new community.</i> iv. <i>New primary and secondary education schools and facilities</i> v. <i>A green infrastructure network of approximately 27 hectares including provision across the A46 and along Court Road towards Churchdown and along Horsbere Brook.</i> vi. <i>The retention of the small traditional orchard to the east of the allocation.</i> vii. <i>A layout and form of development that respects the character, significance and setting of the heritage asset at Brockworth Court and integrates, where appropriate, historically important hedgerows within the development.</i> viii. <i>Adequate flood risk management across the site and ensure that all more vulnerable development is located wholly within flood zone 1. Proposals should not adversely impact on the Horsebere Brook Flood Alleviation Scheme or the standard of protection it provides.</i> ix. <i>Protection to key biodiversity assets, including facilitating the active management of Horsbere Brook for biodiversity and water quality enhancements.</i> x. <i>Primary vehicle accesses from Delta Way, Valiant Way and Court Road.</i> xi. <i>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.</i> xii. <i>High quality public transport facilities and connections within and adjacent to the site</i>

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		<p><i>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.</i></p>
MM111	Plan A5 North West Cheltenham	<p><i>POLICY A5 - NORTH WEST CHELTENHAM</i></p> <p><i>The Strategic Allocation identified at North West Cheltenham (as shown on Policies map Plan A5) will be expected to deliver:</i></p> <ul style="list-style-type: none"> <i>i. Approximately 4,285 new homes</i> <i>ii. 10 hectare B-class office park</i> <i>iii. 13 hectares of predominately non B-class employment generating land for local centre(s) including the provision of an appropriate scale of retail, healthcare and community facilities to meet the needs of the new community,</i> <i>iv. New primary and secondary education schools and facilities</i> <i>v. A green infrastructure network of approximately 100 hectares which will conserve the River Swilgate and Hyde Brook corridors, protecting important trees and hedgerows where appropriate, and contribute to water quality enhancements.</i> <i>vi. Protection to key biodiversity assets including through the development of a Biodiversity Management Plan.</i> <i>vii. Adequate flood risk management across the site and ensure that all more vulnerable development is located wholly within flood zone 1.</i> <i>viii. A layout and form of development that respects the landscape character, and separation of the villages of Brockhampton, Elmstone Hardwicke, Swindon and Uckington.</i> <i>ix. A layout and form that respects the character, significance and setting of heritage assets that may be affected by development.</i> <i>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</i> <i>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.</i> <i>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.</i> <i>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.</i> <i>xiv. Safe, easy and convenient pedestrian and cycle links within the site and to key centres, providing segregated links where practical.</i> <i>xv. Take into account of the indicative Local Green Spaces identified on the Policies map with consideration of the special features of that area which make it suitable for this designation.</i>

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MM112	Plan A6 South Cheltenham Leckhampton	<p>Plan A6 – South Cheltenham – Leckhampton</p> <p>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.</p>
MM113	Plan A7 South Cheltenham Up Hatherley Way	<p>Plan A7 – South Cheltenham – Up Hatherley Way</p> <p>Removed.</p>
MM114	Plan A8 MoD Site at Ashchurch	<p>Plan A8 – MOD Site at Ashchurch</p> <p>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.</p>
MM115	Plan A9 Ashchurch	<p><i>POLICY A9 - Ashchurch</i></p> <p><i>The Strategic Allocation identified at Ashchurch (as shown on Policies map Plan A9) will be expected to deliver:</i></p> <ul style="list-style-type: none"> <i>i. Approximately 14 hectares of employment generating land.</i> <i>ii. A green infrastructure network of approximately 5 hectares including a green corridor along the route of the Tirlle Brook and a woodland belt at the southern boundary of the site to minimise harm to views from Oxenton Hill and contribute to water quality enhancements.</i> <i>iii. Adequate flood risk management across the site and ensure that all more vulnerable development is located wholly within flood zone 1.</i> <i>iv. Primary vehicle access from the A46 and a secondary access from Fiddington Lane.</i>

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		<ul style="list-style-type: none"> v. <i>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.</i> vi. <i>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.</i> vii. <i>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.</i> viii. <i>Safe, easy and convenient pedestrian and cycle links within the site and to key centres and the railway station, providing segregated links where practical.</i>
MM116	Strategic Allocations Information	<p><i>POLICY A10 - Winneycroft</i></p> <p><i>The Strategic Allocation identified at Winneycroft (as shown on Policies map Plan A10) will be expected to deliver:</i></p> <ul style="list-style-type: none"> i. <i>At least 620 new homes</i> ii. <i>A comprehensive green infrastructure network will be provided on site, including the provision of on-site allotments, a new on-site community orchard, and the retention of protected trees to support and improve the ecology of the area and contribute to water quality enhancements.</i> iii. <i>Areas of informal and formal recreation space on-site including the provision of permanent changing facilities.</i> iv. <i>Adequate flood risk management across the site, including betterment works to the Sudbrook to provide downstream attenuation and the potential for a sustainable drainage system for the M5 drainage to reduce the impact on the Sudbrook.</i> v. <i>A layout and form that integrates, where appropriate, important hedgerows within the development.</i> vi. <i>A layout and form that respects the landscape character of the edge of city setting and the transition to suburban and rural character to south and east of the site and the Cotswolds AONB.</i> vii. <i>A layout and form that respects the setting of all heritage assets including Winneycroft Farm and the adjacent historic orchard area.</i> viii. <i>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.</i> ix. <i>Primary vehicle accesses from Corncroft Lane and Winneycroft Lane.</i> x. <i>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.</i> xi. <i>High quality public transport facilities and connections within and adjacent to the site.</i> xii. <i>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.</i>

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MM117	Strategic Allocations Information	<p>PLAN A10 - Winnycroft</p> <p><i>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.</i></p> <p><i>Addition of red line plan A10 - see "Joint Core Strategy Main Modifications Consultation February 2017 Modified and New Maps" document.</i></p>
MM118	Strategic Allocations Information	<p>POLICY A11 – West Cheltenham</p> <p><i>The Strategic Allocation identified at West Cheltenham (as shown on Policies map Plan A11) will be expected to deliver:</i></p> <ul style="list-style-type: none"> <i>i. Approximately 1,100 new homes</i> <i>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</i> <i>iii. All development should be employment led, delivery of housing must be in tandem with employment development</i> <i>iv. A comprehensive masterplan and development strategy for the strategic allocation, set within the context of the safeguarded land at West Cheltenham, which includes:</i> <ul style="list-style-type: none"> <i>a. a delivery strategy for employment focussed land release</i> <i>b. a positive impact on the regeneration of neighbourhoods in west Cheltenham</i> <i>c. Integrates built form and a comprehensive network of accessible green infrastructure, including local green space. The network will incorporate and protect notable natural features, including the Hatherley Brook, the Fiddlers Green Key Wildlife Site and important trees and hedgerows, and contribute to water quality enhancements.</i> <i>v. Vehicle accesses from Fiddlers Green Lane and B4634 Old Gloucester Road and facilitate links to the M5 for strategic movements to and from the site.</i> <i>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.</i> <i>vii. High quality public transport facilities and connections within and adjacent to the site.</i> <i>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.</i> <i>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</i>

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		<p><i>within the Odour Monitoring Zone identified on the policies map.</i></p> <p><i>x. A landscape buffer to the western boundary of the site which will provide screening between the development and the Hayden sewage treatment works.</i></p> <p><i>xi. A layout and form that respects landscape character, significance and setting of the heritage assets at Hayden Farmhouse and Barn.</i></p> <p><i>xii. A layout and form that reduces the impact of electricity pylons and high voltage lines; with the siting of residential development being a particular consideration.</i></p>
MM119	Strategic Allocations Information	<p><i>PLAN A11 – West Cheltenham</i></p> <p><i>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.</i></p> <p><i>Addition of red line plan A11 - see “Joint Core Strategy Main Modifications Consultation February 2017 Modified and New Maps” document.</i></p>
MM120	Indicative site layouts	<p><i>Indicative site layouts</i></p> <p><i>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 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.</i></p> <p><i>Removal of indicative site layouts 2, 6 and 8; addition of indicative site layouts 1a, 10 and 11; update to indicative site layouts 1 and 5. See “Joint Core Strategy Main Modifications Consultation February 2017 Modified and New Maps” document.</i></p>
MM121	Part 7 Monitoring & Review 7.1 7.2 7.3 7.4	<p><i>PART 7 – Delivery, Monitoring & Review</i></p> <p><i>Delivery (including Housing Implementation Strategy)</i></p> <p><i>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</i></p>

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		<p><i>circumstances. The HIS (which takes forward the Housing Background Paper – EBLO 101) sets out the trajectory and delivery for both market and affordable housing.</i></p> <p><i>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.</i></p> <p><i>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.</i></p>
MM122	7.1 7.2 7.3 7.4	<p>Monitoring Background</p> <p>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.</p> <p>The NPPF sets out that plans should be flexible to adapt to changing circumstances. As detailed in the introduction to this plan, 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.</p> <p>In order to ensure effective monitoring, a Monitoring Framework has been prepared, setting out key indicators that will track the delivery of the plan.</p> <p>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).</p>

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		<p><i>The monitoring outcomes will be reported through a single JCS Authority Monitoring Report (AMR) which will be regularly updated.</i> 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.</p> <p><i>The NPPF requires plans to be flexible and responsive to change. If monitoring indicates that delivery problems are emerging or that circumstances are changing in other ways, the JCS authorities will consider implementing some or all the following measures to bring forward development:</i></p> <ul style="list-style-type: none"> <i>• working with developers and infrastructure providers to remove obstacles to the delivery of sites</i> <i>• seeking alternative sources of funding if problems with infrastructure provision is delaying development of key strategic sites</i> <i>• the early release of safeguarded land</i> <i>• 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</i> <i>• 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.</i>
MM123	Part Monitoring & Review 7.1 7.2 7.3 7.4	<p><i>Review</i></p> <p><i>Housing Supply Review Mechanism</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>In the event of the strategic allocations cumulatively delivering less than 75% of their projected housing completions (considered</i></p>

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Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes
		<p><i>annually), over three consecutive years (based on the trajectories set out in the Housing Implementation Strategy), this will trigger the need for the consideration of a partial or full JCS review.</i></p> <p><i>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.</i></p> <p><i>“We will work together to achieve ... core strategies and local plans ... and coordination of plan reviews by 2020” (Gloucestershire Devolution Bid - September 2015)</i></p> <p><u><i>Retail Review</i></u></p> <p><i>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.</i></p>
MM123a	Part Monitoring & Review 7	<p><i>Gloucester Housing Supply Review</i></p> <p><i>As presented in the housing trajectories below, Gloucester City has an identified shortfall against the total JCS housing requirement of 1,346 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.</i></p> <p><i>To deal with the shortfall the JCS authorities will undertake an immediate review of Gloucester’s housing supply following the adoption of the JCS.</i></p> <p><i>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.</i></p> <p><i>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</i></p>

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes
		<p><i>Local Plan so that all potential development alternatives are comprehensively explored using agreed site assessment criteria through the plan-making process.</i></p>
MM123b	Part 7 Monitoring & Review	<p><i>Tewkesbury Housing Supply Review</i></p> <p><i>As presented in the housing trajectories below, Tewkesbury Borough has an identified shortfall against the total JCS housing requirement of 2,455 dwellings. This shortfall has been significantly exacerbated by a recent decision by the Defence Infrastructure Organisation regarding the now delayed release of the MoD Ashchurch strategic allocation which was expected to deliver 2,125 dwellings to 2031. Despite this shortfall, Tewkesbury Borough can maintain at least a 6.3 years supply of housing land and sufficient sites to deliver housing in the short to medium term. However, it is critical that the shortfall is addressed over the plan period and the JCS authorities are providing an approach to dealing with this in a strategic and plan-led way.</i></p> <p><i>To deal with the shortfall the JCS authorities will undertake a review of Tewkesbury’s housing supply immediately after the adoption of the JCS.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p>

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes
		<p><i>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.</i></p> <p><i>The Borough Council have submitted a bid for the HCA Capacity Fund in order to support the delivery of growth in this area and unlock housing sites both within and beyond the current plan period. This will include facilitating the earlier release of sites where possible, particularly exploring the potential to bring forward the remaining development parcels on the MoD strategic allocation where access and place making are challenges. However it will also involve support for developing a strategy for longer-term growth, looking beyond sites that have been identified through the JCS process and incorporating the impact and opportunities of an off-line A46 route. This will include support for a Development Delivery Plan, including strategic masterplanning, to provide a comprehensive approach which addresses issues such as place making, transport, community building, social infrastructure and green infrastructure. This work will help to inform the review of the JCS and the issue of Tewkesbury's housing supply.</i></p> <p><i>Outside of the JCS area a site Mitton, in Wychavon District, has been promoted to the JCS examination as an omission site which could help meet the requirements of Tewkesbury Borough. The JCS authorities are working with Wychavon on the potential and possible release of land at Mitton to deal with 500 homes coming forward to meet Tewkesbury's needs. The JCS authorities will continue to work with Wychavon on the potential delivery of the site in the context of the South Worcestershire Development Plan and the Bredon Neighbourhood Plan.</i></p>
MM123c	Part Monitoring & Review	<p><i>Policy REV1: Gloucester and Tewkesbury Housing Supply Review</i></p> <p><i>A partial review of the housing supply for Gloucester and Tewkesbury will commence immediately upon adoption of the JCS. On adoption, the authorities will publish a Local Development Scheme to set out the timescales for completion. The review will cover the allocation of sites to help meet any shortfall in housing supply against the JCS housing requirements for the respective authorities.</i></p>
MM124	Part Monitoring & Review	<p><i>Trajectories</i></p> <p><i>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.</i></p> <p><i>Then again for each Council is a chart which graphically illustrate the requirement versus completions on a cumulative basis.</i></p>

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes
		<p><i>For each Council, the 5 years supply calculation is provided.</i></p> <p><i>Approach to Previous Delivery Shortfalls Against the Housing Requirement</i></p> <p><i>The JCS examination included a discussion regarding whether any plan period shortfalls in delivery could be spread over the remainder of the plan period (Liverpool approach), allowing time for sites to begin delivery to address it. The Submission JCS was accompanied by 5 year supply calculations that included the entire shortfall within the first 5 years (Sedgefield approach). However, it is considered that there is real merit in using the Liverpool approach and spreading the shortfall across the plan period.</i></p> <p><i>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):</i></p> <p><i>“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.”</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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).</i></p>

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes
MM125	Part 7 Monitoring & Review	<p><i>Gloucester</i></p> <p><i>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.</i></p> <p><i>(NEW TABLE)</i></p>

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes								
		Gloucester							Liverpool	
		Year	Other Delivery	SA Delivery	Total Projected Completions	Cumulative Completions	Plan - Annual Housing Requirement	Plan - Cumulative Housing Requirement	Monitor - No. of dwellings above or below cumulative requirement	Manage - annual requirement taking account of past/projected completions
		2011-12	593	0	593	593	718	718	125	718
		2012-13	430	0	430	1023	718	1436	413	724
		2013-14	476	0	476	1499	718	2154	655	740
		2014-15	554	0	554	2053	718	2872	819	754
		2015-16	470	0	470	2523	718	3590	1067	766
		2016-17	439	0	439	2962	718	4308	1346	785
		2017-18	640	0	640	3602	718	5026	1424	808
		2018-19	857	150	1007	4609	718	5744	1135	820
		2019-20	977	375	1352	5961	718	6462	501	805
		2020-21	622	450	1072	7033	718	7180	147	760
		2021-22	464	525	989	8022	718	7898	-124	731
		2022-23	431	600	1031	9053	718	8616	-437	706
		2023-24	273	600	873	9926	718	9334	-592	669
		2024-25	162	600	762	10688	718	10052	-636	644
		2025-26	64	600	664	11352	718	10770	-582	627
		2026-27	64	595	659	12011	718	11488	-523	621
		2027-28	64	545	609	12620	718	12206	-414	613
		2028-29	64	325	389	13009	718	12924	-85	615
		2029-30	64	100	164	13173	718	13642	469	690
		2030-31	64	50	114	13287	718	14360	1073	953

(NEW CHART)

JCS Table of Main Modifications

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		<div data-bbox="586 309 1861 1152" data-label="Figure"> <p>Gloucester City</p> <table border="1"> <caption>Estimated Data from Gloucester City Housing Delivery Chart</caption> <thead> <tr> <th>Year</th> <th>Cumulative Other Delivery</th> <th>Cumulative SA Delivery</th> <th>Plan - Cumulative Housing Requirement</th> <th>Monitor (10% above requirement)</th> </tr> </thead> <tbody> <tr><td>2011-12</td><td>500</td><td>0</td><td>500</td><td>550</td></tr> <tr><td>2012-13</td><td>1000</td><td>0</td><td>1000</td><td>1100</td></tr> <tr><td>2013-14</td><td>1500</td><td>0</td><td>1500</td><td>1650</td></tr> <tr><td>2014-15</td><td>2000</td><td>0</td><td>2000</td><td>2200</td></tr> <tr><td>2015-16</td><td>2500</td><td>0</td><td>2500</td><td>2750</td></tr> <tr><td>2016-17</td><td>3000</td><td>0</td><td>3000</td><td>3300</td></tr> <tr><td>2017-18</td><td>3500</td><td>0</td><td>3500</td><td>3850</td></tr> <tr><td>2018-19</td><td>4000</td><td>500</td><td>4000</td><td>4400</td></tr> <tr><td>2019-20</td><td>5000</td><td>1000</td><td>5000</td><td>5450</td></tr> <tr><td>2020-21</td><td>6000</td><td>1500</td><td>6000</td><td>6500</td></tr> <tr><td>2021-22</td><td>6500</td><td>2000</td><td>7000</td><td>7550</td></tr> <tr><td>2022-23</td><td>7000</td><td>2500</td><td>8000</td><td>8600</td></tr> <tr><td>2023-24</td><td>7500</td><td>3000</td><td>9000</td><td>9650</td></tr> <tr><td>2024-25</td><td>8000</td><td>3500</td><td>10000</td><td>10700</td></tr> <tr><td>2025-26</td><td>8500</td><td>4000</td><td>11000</td><td>11750</td></tr> <tr><td>2026-27</td><td>9000</td><td>4500</td><td>12000</td><td>12800</td></tr> <tr><td>2027-28</td><td>9500</td><td>5000</td><td>13000</td><td>13850</td></tr> <tr><td>2028-29</td><td>10000</td><td>5500</td><td>14000</td><td>14900</td></tr> <tr><td>2029-30</td><td>10500</td><td>6000</td><td>15000</td><td>15950</td></tr> <tr><td>2030-31</td><td>11000</td><td>6500</td><td>16000</td><td>17000</td></tr> </tbody> </table> </div> <p data-bbox="586 1321 728 1348"><i>(NEW TABLE)</i></p> <table border="1" data-bbox="586 1353 2051 1386"> <thead> <tr> <th data-bbox="586 1353 651 1386"></th> <th data-bbox="651 1353 1361 1386">Pre Adoption Delivery</th> <th data-bbox="1361 1353 1720 1386">Explanation</th> <th data-bbox="1720 1353 2051 1386">5% Buffer</th> </tr> </thead> <tbody> <tr> <td data-bbox="586 1386 651 1386"></td> <td data-bbox="651 1386 1361 1386"></td> <td data-bbox="1361 1386 1720 1386"></td> <td data-bbox="1720 1386 2051 1386"></td> </tr> </tbody> </table>	Year	Cumulative Other Delivery	Cumulative SA Delivery	Plan - Cumulative Housing Requirement	Monitor (10% above requirement)	2011-12	500	0	500	550	2012-13	1000	0	1000	1100	2013-14	1500	0	1500	1650	2014-15	2000	0	2000	2200	2015-16	2500	0	2500	2750	2016-17	3000	0	3000	3300	2017-18	3500	0	3500	3850	2018-19	4000	500	4000	4400	2019-20	5000	1000	5000	5450	2020-21	6000	1500	6000	6500	2021-22	6500	2000	7000	7550	2022-23	7000	2500	8000	8600	2023-24	7500	3000	9000	9650	2024-25	8000	3500	10000	10700	2025-26	8500	4000	11000	11750	2026-27	9000	4500	12000	12800	2027-28	9500	5000	13000	13850	2028-29	10000	5500	14000	14900	2029-30	10500	6000	15000	15950	2030-31	11000	6500	16000	17000		Pre Adoption Delivery	Explanation	5% Buffer				
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JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes				
		A	GCC Annual Housing Requirement		718	718
		B	Number of years into the plan period to adoption		7	7
		C	Requirement to plan adoption		4308	4308
		D	Actual Delivery 2011-2017		2962	2962
		E	Total anticipated Delivery to Plan adoption	E = D	2962	2962
		F	Anticipated shortfall on adoption	F = C – E	1346	1346
			5YHLS from Adoption		Sedgefield	Liverpool
		G	5 Year Requirement	G = A X 5	3590	3590
		H	Remainder of plan period		13	13
		I	Plan Period Shortfall to be met within the five year period	I, Sedge= F, Liv= (F/H) X 5	1346	518
		J	NPPF Buffer	J = 5% of (G+I)	247	205
		K	Total no. of dwellings required	K = G + I + J	5183	4313
		L	Total anticipated supply		4965	4965
M	Percentage of total requirement met	M = K / L	95.8%	115.1%		
M	Supply in Years	M = K / L X 5	4.8	5.8		
MM126	Part 7 Monitoring & Review	<p><i>Cheltenham</i></p> <p><i>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.</i></p> <p><i>A step trajectory has been employed up to 2021/2022, which improves the 5 year supply.</i></p>				

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes																		
		<p data-bbox="584 1129 730 1155"><i>(NEW TABLE)</i></p> <table border="1" data-bbox="584 1166 1774 1375"> <thead> <tr> <th colspan="5" data-bbox="584 1166 1189 1192">Cheltenham</th> <th colspan="4" data-bbox="1615 1166 1774 1192">Liverpool</th> </tr> <tr> <th data-bbox="584 1192 723 1375">Year</th> <th data-bbox="723 1192 822 1375">Other Delivery</th> <th data-bbox="822 1192 920 1375">SA Delivery</th> <th data-bbox="920 1192 1039 1375">Total Projected Completions</th> <th data-bbox="1039 1192 1189 1375">Cumulative Completions</th> <th data-bbox="1189 1192 1323 1375">Plan - Annual Housing Requirement</th> <th data-bbox="1323 1192 1451 1375">Plan - Cumulative Housing Requirement</th> <th data-bbox="1451 1192 1608 1375">Monitor - No. of dwellings above or below cumulative requirement</th> <th data-bbox="1608 1192 1774 1375">Manage - annual requirement taking account of past/projected completions</th> </tr> </thead> </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
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		2011-12	33	0	33	33	450	450	417	450	
		2012-13	268	0	268	301	450	900	599	471	
		2013-14	413	0	413	714	450	1350	636	482	
		2014-15	316	0	316	1030	450	1800	770	485	
		2015-16	397	0	397	1427	450	2250	823	495	
		2016-17	297	0	297	1724	450	2700	976	501	
		2017-18	448	0	448	2172	450	3150	978	515	
		2018-19	564	160	724	2896	450	3600	704	520	
		2019-20	528	365	893	3789	450	4050	261	504	
		2020-21	480	310	790	4579	450	4500	-79	472	
		2021-22	418	335	753	5332	450	4950	-382	443	
		2022-23	314	360	674	6006	663	5613	-393	412	
		2023-24	313	360	673	6679	663	6276	-403	619	
		2024-25	243	485	728	7407	663	6939	-468	613	
		2025-26	188	580	768	8175	663	7602	-573	596	
		2026-27	140	580	720	8895	663	8265	-630	568	
		2027-28	83	580	663	9558	663	8928	-630	537	
		2028-29	93	510	603	10161	663	9591	-570	506	
		2029-30	79	380	459	10620	663	10254	-366	473	
		2030-31	92	380	472	11092	663	10917	-175	480	
		<i>(NEW CHART)</i>									

JCS Table of Main Modifications

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		<div data-bbox="584 312 1845 1126" data-label="Figure"> <p>Cheltenham Borough</p> <p>Legend:</p> <ul style="list-style-type: none"> Cumulative SA Delivery (Green) Cumulative Other Delivery (Purple) Plan - Cumulative Housing Requirement (Blue line) Monitor (10% above requirement) (Orange line) <table border="1"> <caption>Estimated Data from Cheltenham Borough Chart</caption> <thead> <tr> <th>Year</th> <th>Cumulative Other Delivery</th> <th>Cumulative SA Delivery</th> <th>Plan - Cumulative Housing Requirement</th> <th>Monitor (10% above requirement)</th> </tr> </thead> <tbody> <tr><td>2011-12</td><td>0</td><td>0</td><td>0</td><td>0</td></tr> <tr><td>2012-13</td><td>200</td><td>0</td><td>500</td><td>550</td></tr> <tr><td>2013-14</td><td>400</td><td>0</td><td>1000</td><td>1100</td></tr> <tr><td>2014-15</td><td>600</td><td>0</td><td>1500</td><td>1650</td></tr> <tr><td>2015-16</td><td>800</td><td>0</td><td>2000</td><td>2200</td></tr> <tr><td>2016-17</td><td>1000</td><td>0</td><td>2500</td><td>2750</td></tr> <tr><td>2017-18</td><td>1200</td><td>0</td><td>3000</td><td>3300</td></tr> <tr><td>2018-19</td><td>1400</td><td>0</td><td>3500</td><td>3850</td></tr> <tr><td>2019-20</td><td>1600</td><td>0</td><td>4000</td><td>4400</td></tr> <tr><td>2020-21</td><td>1800</td><td>0</td><td>4500</td><td>4950</td></tr> <tr><td>2021-22</td><td>2000</td><td>0</td><td>5000</td><td>5500</td></tr> <tr><td>2022-23</td><td>2200</td><td>0</td><td>5500</td><td>6050</td></tr> <tr><td>2023-24</td><td>2400</td><td>0</td><td>6000</td><td>6600</td></tr> <tr><td>2024-25</td><td>2600</td><td>0</td><td>6500</td><td>7150</td></tr> <tr><td>2025-26</td><td>2800</td><td>0</td><td>7000</td><td>7700</td></tr> <tr><td>2026-27</td><td>3000</td><td>0</td><td>7500</td><td>8250</td></tr> <tr><td>2027-28</td><td>3200</td><td>0</td><td>8000</td><td>8800</td></tr> <tr><td>2028-29</td><td>3400</td><td>0</td><td>8500</td><td>9350</td></tr> <tr><td>2029-30</td><td>3600</td><td>0</td><td>9000</td><td>9900</td></tr> <tr><td>2030-31</td><td>3800</td><td>0</td><td>9500</td><td>10450</td></tr> </tbody> </table> </div> <p data-bbox="584 1262 730 1289"><i>(NEW TABLE)</i></p> <table border="1" data-bbox="584 1323 1774 1393"> <thead> <tr> <th></th> <th>Pre Adoption Delivery</th> <th>Explanation</th> <th colspan="2">20% Buffer</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>CBC Annual Housing Requirement</td> <td></td> <td>450</td> <td>450</td> </tr> </tbody> </table>	Year	Cumulative Other Delivery	Cumulative SA Delivery	Plan - Cumulative Housing Requirement	Monitor (10% above requirement)	2011-12	0	0	0	0	2012-13	200	0	500	550	2013-14	400	0	1000	1100	2014-15	600	0	1500	1650	2015-16	800	0	2000	2200	2016-17	1000	0	2500	2750	2017-18	1200	0	3000	3300	2018-19	1400	0	3500	3850	2019-20	1600	0	4000	4400	2020-21	1800	0	4500	4950	2021-22	2000	0	5000	5500	2022-23	2200	0	5500	6050	2023-24	2400	0	6000	6600	2024-25	2600	0	6500	7150	2025-26	2800	0	7000	7700	2026-27	3000	0	7500	8250	2027-28	3200	0	8000	8800	2028-29	3400	0	8500	9350	2029-30	3600	0	9000	9900	2030-31	3800	0	9500	10450		Pre Adoption Delivery	Explanation	20% Buffer		A	CBC Annual Housing Requirement		450	450
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		B	Number of years into the plan period to adoption		7	7
		C	Requirement to plan adoption		2700	2700
		D	Actual Delivery 2011-2017		1724	1724
		E	Total anticipated Delivery to Plan adoption	E = D	1724	1724
		F	Anticipated shortfall on adoption	F = C – E	976	976
			5YHLS from Adoption		Sedgefield	Liverpool
		G	5 Year Requirement	G = A X 5	2250	2250
		H	Remainder of plan period		13	13
		I	Plan Period Shortfall to be met within the five year period	I, Sedge= F, Liv= (F/H) X 5	975	375
		J	NPPF Buffer	J = 20% of (G+I)	645	525
		K	Total no. of dwellings required	K = G + I + J	3870	3150
		L	Total anticipated supply 2017 to 2022		3539	3539
		M	Percentage of total requirement met	M = K / L	91.4%	112.3%
		M	Supply in Years	M = K / L X 5	4.6	5.6
MM127	Part 7 Monitoring & Review	<p><i>Tewkesbury</i></p> <p><i>The charts below for Tewkesbury, demonstrates sufficient housing land supply, including a 5 year supply, until the middle of the plan period at 2024/25 where there is a shortfall against the cumulative housing requirements. This will enable adequate time to undertake an immediate review of Tewkesbury's housing supply while maintaining a 5 year supply.</i></p>				

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		Tewkesbury					Sedgefield			
					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
		Year	Other Delivery	SA Delivery						
		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	572	0	572	1865	495	1980	115	533
		2015-16	631	0	631	2496	495	2475	-21	518
		2016-17	728	0	728	3224	495	2970	-254	491
		2017-18	863	0	863	4087	495	3465	-622	444
		2018-19	824	25	849	4936	495	3960	-976	371
		2019-20	715	125	840	5776	495	4455	-1321	300
		2020-21	481	125	606	6382	495	4950	-1432	231
		2021-22	178	125	303	6685	495	5445	-1240	209
		2022-23	147	100	247	6932	495	5940	-992	247
		2023-24	106	0	106	7038	495	6435	-603	297
		2024-25	76	0	76	7114	495	6930	-184	374
		2025-26	76	0	76	7190	495	7425	235	458
		2026-27	61	0	61	7251	495	7920	669	542
		2027-28	56	0	56	7307	495	8415	1108	629
		2028-29	46	0	46	7353	495	8910	1557	717
		2029-30	46	0	46	7399	495	9405	2006	806
		2030-31	46	0	46	7445	495	9900	2455	896
		<i>(NEW CHART)</i>								

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		<p style="text-align: center;">Tewkesbury Borough</p> <p>The chart displays the following data series:</p> <ul style="list-style-type: none"> Cumulative SS Delivery: Represented by green bars stacked on top of the purple bars. Cumulative Other Delivery: Represented by purple bars. Plan-Cumulative Housing Requirement: Represented by a blue line. Monitor (10% above requirement): Represented by an orange line. <p>The Y-axis represents the 'No. of dwellings' ranging from 0 to 12,000. The X-axis represents the 'Year' from 2011-12 to 2030-31. The cumulative delivery (purple and green bars) shows a steady increase, reaching approximately 7,500 dwellings by 2030-31. The Plan-Cumulative Housing Requirement (blue line) reaches approximately 10,000 dwellings, and the Monitor (10% above requirement) (orange line) reaches approximately 11,000 dwellings.</p> <p style="color: red;">(NEW TABLE)</p>

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MM128	Part 7 Monitoring & Review	<i>Strategic Allocations Trajectory (including Mitton in Wychavon)</i> <i>(NEW TABLE)</i>																																																																								

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		Site Name	District	Net Site Capacity	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31							
		Land at West Cheltenham (whole site)	Cheltenham/ Tewkesbury Borough	1100		25	50	50	75	100	100	100	100	100	100	100	100	100							
		North West Cheltenham (whole site)	Cheltenham/ Tewkesbury Borough	4285		135	315	260	260	260	260	385	480	480	480	410	280	280							
		Innsworth	Tewkesbury Borough	1300		25	50	50	125	150	150	150	150	150	150										
		Twigworth	Tewkesbury Borough	995			25	50	50	125	150	150	150	145											
		South Churchdown	Tewkesbury Borough	1100			50	100	100	100	100	100	100	100	100	100	50								
		North Brockworth	Tewkesbury Borough	1500		75	150	150	150	150	150	150	150	150	75										
		Winnycroft	Gloucester City	620		50	100	100	100	75	50	50	45												
		Mitton	Wychavon District	500		25	125	125	125	100															
		Total Delivery			0	335	865	885	985	1060	960	1085	1180	1175	1125	835	480	430							
MM129	Monitoring Framework	<p><i>Monitoring Framework</i></p> <p><i>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.</i></p> <table border="1"> <thead> <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> </thead> </table>																Building a strong and competitive urban economy				Indicator	Target	Source	Period
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		Net additional jFobs created by sector (employment generating uses)	A minimum of 28,000 39,500 jobs created over the plan period	GCC Inform	Annually
		Economically inactive persons aged 16-64	Maintain levels close to the south west and national average	ONS	Annually
		Net amount of employment floorspace created by use class (employment-generating uses)	34.60ha 192ha of employment land floorspace created delivered over the plan period.	Annual Employment Monitoring	Annually
		Amount of employment land lost to other non-employment-generating uses	No target but annually assessed	Annual Employment Monitoring	Annually
		Gross weekly earnings of full- time workers.	Maintain levels close to the south west and national average	ONS/NOMIS	Annually
		Percentage of residents with NVQ Level 4 qualification and above	Maintain levels close to the south west and national average	ONS	Annually
		Net new business start-ups	To increase business start-ups in the JCS area, improving on the rate of start-ups per 10,000 working age people against other English districts	GCC Inform	Annually

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MM130	Monitoring Framework	Meeting the challenges of climate change			
		Indicator	Target	Source	Period
		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
		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 1000m ²	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

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Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes			
MM131	Monitoring Framework	Meeting the challenges of climate change Promoting Sustainable Transport			
		Indicator	Target	Source	Period
		Local bus passenger journeys Increase use of bus	Maintain and increase journeys from a base year of 2011/12 (21,361) Increase number of bus passenger journeys	LTP3 Annual Progress Report.	Annually
		Annualised index of cycling trips Increase use of cycling	No target but monitoring progress Increase the number of cycle users at sites across the county	LTP3 Annual Progress Report.	Annually
		Increase use of rail	Increase the number of rail ticket sales from railway stations	LTP3 Annual Progress Report.	Annually
		Average journey time per mile during morning peak Journey time reliability on primary strategic routes	Maintain and improve journey time Maintain average journey times at 2015/16 levels	LTP3 Annual Progress Report.	Annually
Morning peak period traffic – number of vehicles travelling towards urban centres Number of peak hour vehicle journeys	Traffic to remain at current levels compared with 2010 average AM peak period traffic: Gloucester 5539 vehicles Cheltenham 12936 vehicles Restrict growth in the number	LTP3 Annual Progress Report.	Annually		

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			of peak hour vehicle journeys on local access routes		
		Levels of self containment	Continue to improve on 2011 levels: Gloucester 66% Cheltenham 77% Fewkesbury 39%	Census returns	10 year census
MM132	Monitoring Framework	Delivering a wide choice of quality homes			
		Indicator	Target	Source	Period
		Net dwelling completions, based on the set housing requirements and 5-year housing supply	To deliver against the established objectively assessed need over the plan period.	Annual Housing Monitoring	Annually
		Net completions of Gypsy, Traveller and Travelling Showpeople accommodation against requirements, based on the set target	To deliver against the established objectively assessed need over the plan period.	Annual Housing Monitoring	Annually
		Net affordable housing completions against annual requirements	To deliver against the established objectively assessed need over the plan period.	Internal monitoring	Annually
		<i>Cumulative housing completions on JCS Strategic Allocations.</i>	<i>Minimum 75% of the annual cumulative requirement of the three districts.</i>	<i>Internal monitoring</i>	<i>Annually</i>

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MM133	Monitoring Framework	Promoting healthy communities			
		Indicator	Target	Source	Period
		Number of Air Quality Management Areas	Reduce the number of Air Quality Management Areas.	LTP3 Annual Progress Report	Annually
		Access to services and facilities by public transport, walking and cycling <i>Maintain bus passenger access to facilities</i>	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 <i>Maintain level of access to GP services and facilities by public transport within 45 minutes</i>	LTP3 Annual Progress Report	Annually
		Amount of public open space provided in new developments	All schemes to meet policy standards for the provision of public open space	Internal monitoring	Annually
		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

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		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	
		<p>Access to green space –% of dwellings having access to:</p> <ul style="list-style-type: none"> – well maintained, high quality and versatile green space within 300 metres – 20ha green space site within 2km – 100ha green space site within 5km – 500ha green space site within 10km 	Maintain and improve the % of dwellings with sufficient access to green space	Internal monitoring	Annually	
MM134	Superseded Policies – Cheltenham Borough Local Plan 2006	<p>Cheltenham Borough Local Plan 2006</p> <p><i>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).</i></p> <p><i>Explanatory note:</i></p> <p><i>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.</i></p>				

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		<p data-bbox="584 312 2040 371"><i>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.</i></p> <p data-bbox="584 408 2040 467"><i>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.</i></p> <table border="1" data-bbox="600 504 1720 1318"> <thead> <tr> <th data-bbox="607 504 719 632"><i>CBC LP policy ref</i></th> <th data-bbox="719 504 1211 632"><i>Policy heading</i></th> <th data-bbox="1211 504 1720 632"><i>JCS Policies to supersede Local Plan Policy</i></th> </tr> </thead> <tbody> <tr> <td data-bbox="607 632 719 691"><i>CP 1</i></td> <td data-bbox="719 632 1211 691"><i>Sustainable Development</i></td> <td data-bbox="1211 632 1720 691"><i>SD11, SD15</i></td> </tr> <tr> <td data-bbox="607 691 719 786"><i>CP 2</i></td> <td data-bbox="719 691 1211 786"><i>Sequential Approach to Location of Development</i></td> <td data-bbox="1211 691 1720 786"><i>Local Plan Policy to be saved beyond the adoption of the JCS</i></td> </tr> <tr> <td data-bbox="607 786 719 882"><i>CP 3</i></td> <td data-bbox="719 786 1211 882"><i>Sustainable Environment</i></td> <td data-bbox="1211 786 1720 882"><i>Local Plan Policy to be saved beyond the adoption of the JCS</i></td> </tr> <tr> <td data-bbox="607 882 719 978"><i>CP 4</i></td> <td data-bbox="719 882 1211 978"><i>Safe and Sustainable Living</i></td> <td data-bbox="1211 882 1720 978"><i>Local Plan Policy to be saved beyond the adoption of the JCS</i></td> </tr> <tr> <td data-bbox="607 978 719 1037"><i>CP 5</i></td> <td data-bbox="719 978 1211 1037"><i>Sustainable Transport</i></td> <td data-bbox="1211 978 1720 1037"><i>SD5, INF1</i></td> </tr> <tr> <td data-bbox="607 1037 719 1133"><i>CP 6</i></td> <td data-bbox="719 1037 1211 1133"><i>Mixed Use Development</i></td> <td data-bbox="1211 1037 1720 1133"><i>Local Plan Policy to be saved beyond the adoption of the JCS</i></td> </tr> <tr> <td data-bbox="607 1133 719 1227"><i>CP 7</i></td> <td data-bbox="719 1133 1211 1227"><i>Design</i></td> <td data-bbox="1211 1133 1720 1227"><i>Local Plan Policy to be saved beyond the adoption of the JCS</i></td> </tr> <tr> <td data-bbox="607 1227 719 1318"><i>CP 8</i></td> <td data-bbox="719 1227 1211 1318"><i>Provision of Necessary Infrastructure and Facilities</i></td> <td data-bbox="1211 1227 1720 1318"><i>INF5, INF7, INF8</i></td> </tr> </tbody> </table>	<i>CBC LP policy ref</i>	<i>Policy heading</i>	<i>JCS Policies to supersede Local Plan Policy</i>	<i>CP 1</i>	<i>Sustainable Development</i>	<i>SD11, SD15</i>	<i>CP 2</i>	<i>Sequential Approach to Location of Development</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>	<i>CP 3</i>	<i>Sustainable Environment</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>	<i>CP 4</i>	<i>Safe and Sustainable Living</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>	<i>CP 5</i>	<i>Sustainable Transport</i>	<i>SD5, INF1</i>	<i>CP 6</i>	<i>Mixed Use Development</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>	<i>CP 7</i>	<i>Design</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>	<i>CP 8</i>	<i>Provision of Necessary Infrastructure and Facilities</i>	<i>INF5, INF7, INF8</i>
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JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes		
		PR 1	<i>Land Allocated for Housing Development</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		PR 2	<i>Land Allocated for Mixed Use Development</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		PR 3	<i>Land Safeguarded for Transport Schemes</i>	<i>Deleted</i>
		BE 1	<i>Open Space in Conservation Areas</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		BE 2	<i>Residential Character in Conservation Areas</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		BE 3	<i>Demolition in Conservation Areas</i>	<i>Deleted</i>
		BE 4	<i>Timing Of Demolition in Conservation Areas</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		BE 5	<i>Boundary Enclosures in Conservation Areas</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		BE 6	<i>Back Lanes in Conservation Areas</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		BE 7	<i>Parking on Forecourts or Front Gardens in Conservation Areas</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		BE 8	<i>Demolition of Listed Buildings</i>	<i>Deleted</i>
		BE 9	<i>Alteration of Listed Buildings</i>	<i>Deleted</i>

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes		
		<i>BE 10</i>	<i>Boundary Enclosures to Listed Buildings</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>BE 11</i>	<i>Buildings of Local Importance</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>BE 12</i>	<i>Advertisements and Signs</i>	<i>Deleted</i>
		<i>BE 13</i>	<i>Advertisements and Signs in Conservation Areas</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>BE 14</i>	<i>Advertisement Hoardings in Conservation Areas</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>BE 15</i>	<i>Projecting Signs in Conservation Areas</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>BE 16</i>	<i>Petrol Filling Stations and Car Sales in Conservation Areas</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>BE 17</i>	<i>Advertisements And Signs On Listed Buildings</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>BE 18</i>	<i>Design and Landscaping of New Roads</i>	<i>SD5</i>
		<i>BE 19</i>	<i>Nationally Important Archaeological Remains</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>BE 20</i>	<i>Archaeological Remains of Local Importance</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>GE 1</i>	<i>Public Green Space</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes		
		<i>GE 2</i>	<i>Private Green Space</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>GE 3</i>	<i>Development Within Extensive Grounds</i>	<i>SD5, SD10, INF4</i>
		<i>GE 4</i>	<i>Pittville Park and Bouncers Lane Cemetery</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>GE 5</i>	<i>Protection and Replacement of Trees</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>GE 6</i>	<i>Trees And Development</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>GE 7</i>	<i>Accommodation and Protection of Natural Features</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>CO 1</i>	<i>Landscape Character</i>	<i>SD5, SD7, SD8</i>
		<i>CO 2</i>	<i>Development within or affecting the AONB</i>	<i>SD8</i>
		<i>CO 3</i>	<i>Rebuilding or Replacement of Buildings in the AONB</i>	<i>SD8</i>
		<i>CO 4</i>	<i>Extension of Buildings in the AONB</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>CO 5</i>	<i>Definition of Green Belt</i>	<i>SD6</i>
		<i>CO 6</i>	<i>Development in the Green Belt</i>	<i>SD6, SD11</i>

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes			
		CO 7	<i>Rebuilding or Replacement of Dwellings in the Green Belt</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>	
		CO 8	<i>Extension of Dwellings in the Green Belt</i>	<i>Deleted</i>	
		CO 9	<i>Development at Cheltenham Racecourse</i>	<i>SD6</i>	
		CO 10	<i>Agricultural Land</i>	<i>SD15</i>	
		CO 11	<i>Agricultural and Forestry Dwellings</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>	
		CO 12	<i>Farm Diversification Projects</i>	<i>SD2, SD5, SD7,</i>	
		CO 13	<i>Conversion of Rural Buildings</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>	
		CO 14	<i>Development Abutting the Countryside</i>	<i>SD5, SD7</i>	
		NE 1	<i>Habitats of Legally Protected Species</i>	<i>SD10</i>	
		NE 2	<i>Designated Nature Conservation Sites</i>	<i>SD10</i>	
		NE 3	<i>Biodiversity and Geodiversity of Local Importance</i>	<i>SD10</i>	
		NE 4	<i>Contaminated Land</i>	<i>SD15</i>	
		EM 1	<i>Employment Uses</i>	<i>SD2</i>	
		EM 2	<i>Safeguarding of Employment Land</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>	

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Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes		
		<i>HS 1</i>	<i>Housing Development</i>	<i>SD11</i>
		<i>HS 2</i>	<i>Housing Density</i>	<i>SD11</i>
		<i>HS 3</i>	<i>Sub-Division of Existing Dwellings</i>	<i>SD5</i>
		<i>HS 4</i>	<i>Affordable Housing</i>	<i>SD13</i>
		<i>HS 5</i>	<i>Mixed Communities</i>	<i>SD12</i>
		<i>HS 6</i>	<i>Elderly Persons Housing</i>	<i>SD12</i>
		<i>HS 7</i>	<i>Loss of Residential Accommodation</i>	<i>Deleted</i>
		<i>HS 8</i>	<i>Houses in Multiple Occupation</i>	<i>Deleted</i>
		<i>RT 1</i>	<i>Location of Retail Development</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>RT 2</i>	<i>Retail Development in the Core Commercial Area</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>RT 3</i>	<i>Non-A1 Uses in Primary Shopping Frontages</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>RT 4</i>	<i>Retail Development in Local Shopping Centres</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>RT 5</i>	<i>Non A1 Uses In Local Shopping Centres</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>RT 6</i>	<i>New Local Shopping Centres</i>	<i>Deleted</i>

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		<i>RT 7</i>	<i>Retail Development in Out of Centre Locations</i>	<i>Deleted</i>
		<i>RT 8</i>	<i>Individual Convenience Shops</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>RT 9</i>	<i>Car Sales</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>RT 10</i>	<i>Access to Upper Floors of Commercial Premises</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>RC 1</i>	<i>Existing Community Facilities</i>	<i>INF5</i>
		<i>RC 2</i>	<i>Youth and Adult Outdoor Playing Facilities</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>RC 3</i>	<i>Outdoor Playing Facilities in Educational Use</i>	<i>INF5</i>
		<i>RC 4</i>	<i>Casual Play Space</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>RC 5</i>	<i>Development of Amenity Space</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>RC 6</i>	<i>Play Space in Residential Development</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		<i>RC 7</i>	<i>Amenity Space in Housing Developments</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes		
		RC 8	<i>New Public Green Space</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		RC 9	<i>Honeybourne Line Footpath/Cycleway</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		RC 10	<i>Allotments</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		RC 11	<i>Recreation and Sport in the Countryside</i>	<i>SD6, SD7, SD8</i>
		RC 12	<i>Golf Courses</i>	<i>SD6, SD7, SD8</i>
		RC 13	<i>Public Rights of Way in the Countryside</i>	<i>INF4</i>
		UI 1	<i>Development in Flood Zones</i>	<i>INF3</i>
		UI 2	<i>Development and Flooding</i>	<i>INF3</i>
		UI 3	<i>Sustainable Drainage Systems</i>	<i>INF3</i>
		UI 4	<i>Maintenance Strips for Watercourses</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>
		UI 5	<i>Culverting of Watercourses</i>	<i>INF3</i>
		UI 6	<i>Development Near Sewage Treatment Works</i>	<i>SD6</i>
		UI 7	<i>Renewable Energy</i>	<i>SD4, SD5, SD15, INF6</i>
		UI 8	<i>Telecommunications Installations</i>	<i>INF7, SD15</i>

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes			
		TP 1	<i>Development and Highway Safety</i>	<i>SD5, INF1, INF2</i>	
		TP 2	<i>Highway Standards</i>	<i>SD5, INF1, INF2</i>	
		TP 3	<i>Servicing of Shopping Facilities</i>	<i>Deleted</i>	
		TP 4	<i>Long-Stay Car Parking</i>	<i>Local Plan Policy to be saved beyond the adoption of the JCS</i>	
		TP 5	<i>Extension of Private Car Parking Facilities</i>	<i>Deleted</i>	
		TP 6	<i>Parking Provision In Development</i>	<i>Deleted</i>	
MM134a	Superseded Policies – Tewkesbury Borough Local Plan 2006	<p><i>Tewkesbury Borough Local Plan 2006</i></p> <p><i>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).</i></p>			
		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

JCS Table of Main Modifications

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		<i>GNL11</i>	<i>IMPLEMENTATION</i>	<i>YES</i>	<i>INF7</i> <i>INF3</i>
		<i>GNL13</i>	<i>ADVERTISEMENTS</i>	<i>NO</i>	
		<i>GNL15</i>	<i>NEW COMMUNITY FACILITIES</i>	<i>YES</i>	<i>INF5</i>
		<i>GNL17</i>	<i>PRE-SCHOOL CHILDCARE FACILITIES</i>	<i>NO</i>	
		<i>HOU1</i>	<i>HOUSING ALLOCATIONS</i>	<i>NO</i>	
		<i>HOU2</i>	<i>LARGER SETTLEMENTS CONTAINING A PRIMARY LEVEL OF COMMUNITY FACILITIES AND SERVICES</i>	<i>YES</i>	<i>SP2</i> <i>SD11</i>
		<i>HOU3</i>	<i>OTHER VILLAGES (INFILLING ONLY)</i>	<i>YES</i>	<i>SP2</i> <i>SD11</i>
		<i>HOU4</i>	<i>OTHER SETTLEMENTS/RURAL AREAS</i>	<i>YES</i>	<i>SP2</i> <i>SD11</i>
		<i>HOU5</i>	<i>NEW HOUSING DEVELOPMENT WITHIN EXISTING RESIDENTIAL AREAS</i>	<i>YES</i>	<i>SP2</i> <i>SD5</i> <i>SD11</i> <i>SD12</i>
		<i>HOU6</i>	<i>REFURBISHMENT OF EXISTING DWELLINGS</i>	<i>NO</i>	
		<i>HOU7</i>	<i>REPLACEMENT DWELLINGS</i>	<i>NO</i>	

JCS Table of Main Modifications

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		<i>HOU8</i>	<i>DOMESTIC EXTENSIONS</i>	<i>NO</i>	
		<i>HOU9</i>	<i>CONVERSIONS / SUB-DIVISION</i>	<i>NO</i>	
		<i>HOU10</i>	<i>CHANGE OF USE OF AGRICULTURAL LAND TO RESIDENTIAL CURTILAGE</i>	<i>NO</i>	
		<i>HOU11</i>	<i>ELDERLY PERSONS' ACCOMMODATION (INDEPENDENT UNITS)/ SPECIAL NEEDS HOUSING</i>	<i>YES</i>	<i>SD 12</i>
		<i>HOU12</i>	<i>MOBILE HOMES</i>	<i>NO</i>	
		<i>HOU13</i>	<i>AFFORDABLE HOUSING</i>	<i>YES</i>	<i>SD13</i>
		<i>HOU14</i>	<i>AFFORDABLE HOUSING (EXCEPTIONS SCHEMES)</i>	<i>YES</i>	<i>SD13</i>
		<i>HOU16</i>	<i>MINSTERWORTH TRAVELLERS' SITES</i>	<i>NO</i>	
		<i>GRB1</i>	<i>GREEN BELT</i>	<i>YES</i>	<i>SD6</i>
		<i>EMP1</i>	<i>MAJOR EMPLOYMENT SITES</i>	<i>NO</i>	
		<i>EMP2</i>	<i>EMPLOYMENT USES WITHIN SETTLEMENTS OUTSIDE ALLOCATED SITES</i>	<i>NO</i>	
		<i>EMP3</i>	<i>RURAL BUSINESS CENTRES</i>	<i>NO</i>	
		<i>EMP4</i>	<i>RURAL EMPLOYMENT POLICY</i>	<i>YES</i>	<i>SD2</i>
		<i>EMP5</i>	<i>EXISTING EMPLOYMENT USES OUTSIDE SETTLEMENTS, ALLOCATED SITES AND RURAL BUSINESS CENTRES</i>	<i>YES</i>	<i>SD2</i>
		<i>TPT1</i>	<i>ACCESS FOR DEVELOPMENT</i>	<i>YES</i>	<i>INF1</i>

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		<i>TPT3</i>	<i>PEDESTRIAN NETWORKS</i>	<i>NO</i>	
		<i>TPT5</i>	<i>CYCLE NETWORK ENHANCEMENT</i>	<i>NO</i>	
		<i>TPT6</i>	<i>CYCLE PARKING</i>	<i>NO</i>	
		<i>TPT8</i>	<i>PARK AND RIDE PROVISION</i>	<i>NO</i>	
		<i>TPT9</i>	<i>PUBLIC TRANSPORT CORRIDORS</i>	<i>NO</i>	
		<i>TPT10</i>	<i>RAILWAY STATIONS</i>	<i>NO</i>	
		<i>TPT11</i>	<i>SUPPORT FOR RESTORATION OF GLOUCESTERSHIRE WARWICKSHIRE RAILWAY</i>	<i>NO</i>	
		<i>TPT13</i>	<i>M5 JUNCTION 9 TO A46 ASTON CROSS</i>	<i>NO</i>	
		<i>TPT14</i>	<i>TEWKESBURY NORTHERN BYPASS CORRIDOR PROTECTION</i>	<i>NO</i>	
		<i>TPT16</i>	<i>NEW PETROL FILLING STATIONS</i>	<i>NO</i>	
		<i>TPT18</i>	<i>PROTECTION OF POTENTIAL FREIGHT RAILHEADS</i>	<i>YES</i>	<i>SA1</i>
		<i>HEN2</i>	<i>CONSERVATION AREA: SETTING AND IMPACT</i>	<i>NO</i>	
		<i>HEN6</i>	<i>SHOPFRONTS IN CONSERVATION AREAS</i>	<i>NO</i>	
		<i>HEN7</i>	<i>BLINDS AND CANOPIES IN CONSERVATION AREAS</i>	<i>NO</i>	
		<i>HEN17</i>	<i>ADVERTISEMENTS ON LISTED BUILDINGS</i>	<i>NO</i>	
		<i>HEN24</i>	<i>HISTORIC BATTLEFIELDS</i>	<i>NO</i>	
		<i>EVT1</i>	<i>ENERGY</i>	<i>YES</i>	<i>INF6</i>

JCS Table of Main Modifications

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		<i>EVT2</i>	<i>LIGHT POLLUTION</i>	<i>YES</i>	<i>SD15</i>
		<i>EVT3</i>	<i>NOISE POLLUTION</i>	<i>YES</i>	<i>SD15</i>
		<i>EVT5</i>	<i>DEVELOPMENT IN HIGH, AND LOW TO MEDIUM FLOOD RISK AREAS</i>	<i>YES</i>	<i>INF3</i>
		<i>EVT8</i>	<i>DEVELOPMENT NEAR SEWAGE TREATMENT WORKS</i>	<i>NO</i>	
		<i>EVT9</i>	<i>SUSTAINABLE URBAN DRAINAGE SYSTEMS</i>	<i>YES</i>	<i>INF3</i>
		<i>LND2</i>	<i>SPECIAL LANDSCAPE AREA (SLA)</i>	<i>NO</i>	
		<i>LND3</i>	<i>LANDSCAPE PROTECTION ZONE (LPZ)</i>	<i>NO</i>	
		<i>LND4</i>	<i>LANDSCAPE - COUNTRYSIDE PROTECTION</i>	<i>YES</i>	<i>SD7</i>
		<i>LND5</i>	<i>IMPORTANT OPEN SPACES</i>	<i>NO</i>	
		<i>LND6</i>	<i>HISTORIC PARKS AND GARDENS</i>	<i>NO</i>	
		<i>LND7</i>	<i>LANDSCAPING OF NEW DEVELOPMENTS</i>	<i>YES</i>	<i>INF4</i> <i>SD7</i> <i>SD5</i>
		<i>TOR1</i>	<i>GENERAL POLICY</i>	<i>NO</i>	
		<i>TOR2</i>	<i>SERVICED / SELF CATERING ACCOMMODATION</i>	<i>NO</i>	
		<i>TOR4</i>	<i>NEW STATIC CARAVAN / LOG CABIN / CHALET SITES</i>	<i>NO</i>	
		<i>TOR5</i>	<i>TOURING CARAVAN AND CAMPING SITES</i>	<i>NO</i>	
		<i>TOR6</i>	<i>EXTENSIONS TO EXISTING CARAVAN / CAMP SITES</i>	<i>NO</i>	

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes			
		<i>TOR7</i>	<i>FARM DIVERSIFICATION</i>	<i>YES</i>	<i>SD2</i>
		<i>TOR9</i>	<i>HEREFORDSHIRE AND GLOUCESTERSHIRE CANAL</i>	<i>NO</i>	
		<i>RET1</i>	<i>TEWKESBURY TOWN CENTRE PRIMARY SHOPPING FRONTAGES</i>	<i>NO</i>	
		<i>RET2</i>	<i>TEWKESBURY TOWN CENTRE MIXED USE FRONTAGES</i>	<i>NO</i>	
		<i>RET3</i>	<i>RETAIL AREAS</i>	<i>NO</i>	
		<i>RET4</i>	<i>NEW LOCAL FACILITIES</i>	<i>NO</i>	
		<i>RET5</i>	<i>VILLAGE SHOPS AND PUBLIC HOUSES</i>	<i>NO</i>	
		<i>RET6</i>	<i>NEW RETAIL PROPOSALS</i>	<i>YES</i>	<i>SD3</i>
		<i>RET8</i>	<i>GARDEN CENTRES</i>	<i>NO</i>	
		<i>RET9</i>	<i>FARMSHOPS / PICK-YOUR-OWN</i>	<i>YES</i>	<i>SD2</i>
		<i>RCN1</i>	<i>OUTDOOR PLAYING SPACE</i>	<i>NO</i>	
		<i>RCN2</i>	<i>PROVISION OF SPORTS FACILITIES</i>	<i>NO</i>	
		<i>RCN3</i>	<i>NEW ARTS, ENTERTAINMENT AND LEISURE FACILITIES</i>	<i>YES</i>	<i>INF5</i> <i>SD3</i>
		<i>RCN4</i>	<i>RECREATION IN AONB /SLA /LPZ</i>	<i>NO</i>	
		<i>RCN6</i>	<i>HORSE RIDING FACILITIES</i>	<i>NO</i>	
		<i>RCN7</i>	<i>GOLF COURSES AND DRIVING RANGES</i>	<i>NO</i>	

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes			
		<i>RCN8</i>	<i>RECREATIONAL AND COMMERCIAL USE OF PONDS AND LAKES</i>	<i>NO</i>	
		<i>RCN9</i>	<i>NOISE NUISANCE CAUSED BY SPORTS IN THE COUNTRYSIDE</i>	<i>YES</i>	<i>SD15</i>
		<i>RCN10</i>	<i>ALLOTMENTS</i>	<i>NO</i>	
		<i>NCN3</i>	<i>PROTECTION OF OTHER SITES OF NATURE CONSERVATION OR GEOLOGICAL / GEOMORPHOLOGICAL INTEREST</i>	<i>NO</i>	
		<i>NCN5</i>	<i>PROTECTION OF IMPORTANT NATURAL FEATURES / BIODIVERSITY</i>	<i>YES</i>	<i>SD10</i>
		<i>NCN6</i>	<i>NEW AND RESTORED PONDS</i>	<i>NO</i>	
		<i>AGR2</i>	<i>AGRICULTURAL DWELLINGS</i>	<i>NO</i>	
		<i>AGR3</i>	<i>REMOVAL OF AGRICULTURAL WORKERS' OCCUPANCY CONDITIONS</i>	<i>NO</i>	
		<i>AGR4</i>	<i>AGRICULTURAL DIVERSIFICATION</i>	<i>YES</i>	<i>SD2</i>
		<i>AGR5</i>	<i>NEW AGRICULTURAL BUILDINGS</i>	<i>NO</i>	
		<i>AGR6</i>	<i>RE-USE AND ADAPTATION OF RURAL BUILDINGS – GENERAL</i>	<i>NO</i>	
		<i>AGR7</i>	<i>RE-USE AND ADAPTATION OF RURAL BUILDINGS – RETENTION OF CHARACTER</i>	<i>NO</i>	<i>SD11</i>
			<i>LOCAL POLICIES</i>		

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes			
		<i>AC1</i>	<i>LAND ADJACENT TO RAILWAY AT NORTHWAY LANE, NORTHWAY</i>	<i>NO</i>	
		<i>AC3</i>	<i>COWFIELD FARM SOUTH</i>	<i>NO</i>	
		<i>BI1</i>	<i>GILDERS CORNER</i>	<i>NO</i>	
		<i>BI2</i>	<i>NORTH OF DEAN FARM, BISHOPS CLEEVE</i>	<i>NO</i>	
		<i>BI3</i>	<i>MALVERN VIEW, BISHOPS CLEEVE</i>	<i>NO</i>	
		<i>BI4</i>	<i>CLEEVE BUSINESS PARK, BISHOPS CLEEVE</i>	<i>NO</i>	
		<i>BR1</i>	<i>BROCKWORTH AND HUCCLECOTE HOUSING SITES</i>	<i>NO</i>	
		<i>BR2</i>	<i>GLOUCESTER BUSINESS PARK</i>	<i>NO</i>	
		<i>BR3</i>	<i>BROCKWORTH / HUCCLECOTE DISTRICT CENTRE</i>	<i>NO</i>	
		<i>BR5</i>	<i>MILL LANE, BROCKWORTH</i>	<i>NO</i>	
		<i>BR6</i>	<i>KENNEL LANE, BROCKWORTH</i>	<i>NO</i>	
		<i>CH1</i>	<i>SOUTH EAST CAMP</i>	<i>YES</i>	<i>SD6</i>
		<i>CH2</i>	<i>GLOUCESTERSHIRE AIRPORT</i>	<i>YES</i>	<i>SD6</i>
		<i>CH3</i>	<i>ST JOHN'S AVENUE / PARTON ROAD</i>	<i>NO</i>	
		<i>HU1</i>	<i>HUCCLECOTE ROAD, HUCCLECOTE</i>	<i>NO</i>	
		<i>SD1</i>	<i>HILLVIEW NURSERIES, SHURDINGTON</i>	<i>NO</i>	
		<i>SD2</i>	<i>FARM LANE / LECKHAMPTON LANE, SHURDINGTON</i>	<i>YES</i>	<i>SP2</i> <i>SA1</i>

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes																		
		<i>SO1</i>	<i>NOVERTON LANE/MILL LANE, SOUTHAM</i>	<i>NO</i>																
		<i>TY1</i>	<i>ACCESS TO THE RIVER NETWORK</i>	<i>NO</i>																
		<i>TY2</i>	<i>LAND EAST OF PRIORS PARK</i>	<i>NO</i>																
		<i>TY3</i>	<i>BISHOPS WALK / SPRING GARDENS</i>	<i>NO</i>																
		<i>TY4</i>	<i>OLDBURY EMPLOYMENT SITE</i>	<i>NO</i>																
		<i>TY5</i>	<i>BREDON ROAD, TEWKESBURY</i>	<i>NO</i>																
		<i>TY6</i>	<i>TEWKESBURY – BACK OF MAIN STREETS</i>	<i>NO</i>																
		<i>TY7</i>	<i>OLD RAILWAY LINE, TEWKESBURY</i>	<i>NO</i>																
		<i>UC1</i>	<i>BARBRIDGE NURSERIES, UCKINGTON</i>	<i>NO</i>																
MM134b	Superseded Policies – Gloucester Local Plan 1983	<p><i>Gloucester Local Plan 1983</i></p> <p><i>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).</i></p> <table border="1" data-bbox="584 1034 1877 1362"> <thead> <tr> <th data-bbox="584 1034 1413 1129"><i>Local Plan Policy</i></th> <th data-bbox="1413 1034 1664 1129"><i>Superseded by JCS ? Yes/ No/ Partial</i></th> <th data-bbox="1664 1034 1877 1129"><i>Superseding JCS policy</i></th> </tr> </thead> <tbody> <tr> <td data-bbox="584 1129 1413 1189"><i>Introduction</i></td> <td data-bbox="1413 1129 1664 1189"><i>No</i></td> <td data-bbox="1664 1129 1877 1189"></td> </tr> <tr> <td data-bbox="584 1189 1413 1248"><i>Objectives</i></td> <td data-bbox="1413 1189 1664 1248"><i>No</i></td> <td data-bbox="1664 1189 1877 1248"></td> </tr> <tr> <td data-bbox="584 1248 1413 1307"><i>Finance</i></td> <td data-bbox="1413 1248 1664 1307"><i>No</i></td> <td data-bbox="1664 1248 1877 1307"></td> </tr> <tr> <td data-bbox="584 1307 1413 1362"><i>Employment policies</i></td> <td data-bbox="1413 1307 1664 1362"><i>No</i></td> <td data-bbox="1664 1307 1877 1362"></td> </tr> </tbody> </table>				<i>Local Plan Policy</i>	<i>Superseded by JCS ? Yes/ No/ Partial</i>	<i>Superseding JCS policy</i>	<i>Introduction</i>	<i>No</i>		<i>Objectives</i>	<i>No</i>		<i>Finance</i>	<i>No</i>		<i>Employment policies</i>	<i>No</i>	
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JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes			
		<i>E.1 Release of industrial land sufficient for 5 years requirement</i>	No		
		<i>E.2 Release of office development sufficient to cater for 5 years requirement</i>	No		
		<i>H.1 – Release of land for residential development to cater for 5 years requirement</i>	No		
		<i>H1c – Provision of additional housing sites to those identified in H1a will be encouraged in the city centre</i>	No		
		<i>H1e – Density and quality of housing development</i>	No		
		<i>H3 – Preservation and revitalization of older housing stock</i>	No		
		<i>H4 Housing provision for those whose needs are not met by the private sector</i>	Yes	SD12	
		<i>H4.b Provision of grants for adaptation of homes for the registered disabled</i>	No		
		<i>A1.a Heights of buildings and protection of views</i>	No		
		<i>A2 Particular regard will be given to the city’s heritage in terms of archaeological remains, listed buildings and conservation areas</i>	No		
		<i>A2.d Demolition of listed buildings in conservation areas</i>	No		
		<i>A3.a Investigation and resolution of environmental problems caused by traffic on Bristol Road and Barton Street</i>	No		
		<i>A.4e – Development on or around Robinswood Hill will not be permitted except where there are exceptional circumstances</i>	No		

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes			
		<i>A.5a – The inclusion of tourist related uses within the comprehensive redevelopment of the Docks area will be encouraged.</i>	No		
		<i>A.5c – Conservation and maintenance of structures and settings of City’s historic fabric (various sites)</i>	No		
		<i>A.5d – Redevelopment of Blackfriars as a tourist attraction</i>	No		
		<i>A.6a – Provision of coach parking facilitate at Westgate Street and the Docks</i>	No		
		<i>A7 – Encourage provision of an adequate level and mix of accommodation to satisfy visitor demand</i>	No		
		<i>A7.a – Provision of appropriate self-catering accommodation. Conference Centre and central area hotels</i>	No		
		<i>A7.b – Encourage Guest House developments along main radial routes and the city centre</i>	No		
		<i>T.1.e – Pedestrian priority within traffic management schemes in the main shopping area of the city.</i>	No		
		<i>T1.f – Pedestrian priority in the city centre outside the main shopping area</i>	No		
		<i>T2.d - Measures to facilitate rear access servicing</i>	No		
		<i>T3 – Introduction of traffic regulation and control measures along</i>	No		

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes		
		<i>Bristol Road and Southgate Street</i>		
		<i>T3.a – Access to existing and future industrial premises will be assisted, where necessary, by traffic management and other measures</i>	<i>No</i>	
		<i>T3.b – Consideration will be given to traffic management along Bristol Road</i>	<i>No</i>	
		<i>T4.a- Differential charging of short and long stay car parks to discourage inappropriate use</i>	<i>No</i>	
		<i>T4.k – Provision of car parking at private development in accordance with the Councils car parking standards</i>	<i>No</i>	
		<i>T5.b – Early introduction of new bus services with new residential development</i>	<i>Yes</i>	<i>INF1, INF7</i>
		<i>T6 – Measures will be introduced to encourage cycling</i>	<i>Yes</i>	<i>INF1, INF4, INF7</i>
		<i>T6.c – Encourage cyclist-only routes</i>	<i>Yes</i>	<i>INF1, INF4, INF7</i>
		<i>S1 – Main and strengthen Gloucester’s role as a sub-regional shopping centre and concentrate comparison shopping in the city except in exceptional circumstances</i>	<i>Yes</i>	<i>SD3</i>
		<i>S1.a – Major comparison shopping will not usually be permitted outside the main shopping area</i>	<i>Yes</i>	<i>SD3</i>
		<i>S1.e – Conversion of shops to other uses at ground floor level will</i>	<i>No</i>	

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes		
		<i>not normally be allowed in the main shopping area</i>		
		<i>S2.b- Major convenience shopping will not usually be permitted outside the main shopping area</i>	No	
		<i>S3 – Continued provision of shopping facilities to meet local needs outside the City Centre will be encouraged</i>	No	
		<i>S3.a Neighbourhood shopping facilities will be encouraged and sometimes required in developing residential areas</i>	No	
		<i>S3.b – The City Council will seek to maintain the existing neighbourhood shopping provision in the City</i>	No	
		<i>L1 – Retain public open space, provision with new development, and attempt provision where a shortfall has been identified.</i>	No	
		<i>L.1a- Retain existing areas of public open space</i>	No	
		<i>L.1c – In new developments new public open space will be provided in accessible, centralised locations. They must be no less than half an acre in size.</i>	No	
		<i>L.1d – Where public open space already exists or there is a need for recreational facilities other than open space we will consider the provision of alternative leisure facilities at the cost of the developer.</i>	No	
		<i>L.2b – Seek to provide additional sports facilities on public open space in new developments.</i>	Yes	INF7

JCS Table of Main Modifications

Modification Number	Paragraph in Pre-Submission JCS	JCS Pre-Submission original text with track changes			
		<i>L3.c Inclusion of leisure facilities within the docks redevelopment and financial contribution towards the cost of transferring the British Waterways museum to Gloucester</i>	<i>No</i>		
		<i>L3.d – Maintenance and protection of Robinswood Hill Country Park</i>	<i>No</i>		



**Sustainability (Integrated) Appraisal (SA),
incorporating
Strategic Environmental Assessment (SEA)**

SA Adoption Statement

November 2017

enfusion



Gloucester, Cheltenham & Tewkesbury (GCT) Joint Core Strategy (JCS) 2031

Sustainability (Integrated) Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), Habitats Regulations Assessment, Health & Equality Impact Assessment: SA Adoption Statement

Contents:

This SA Adoption Statement

**Development of the Gloucester, Cheltenham & Tewkesbury Joint Core
Strategy (JCS) 2031**

**How environmental & sustainability considerations have been integrated into
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taken into account**

How the results of consultation have been taken into account

**Reasons for choosing the Joint Core Strategy as adopted, in the light of other
reasonable alternatives**

**Measures that are to be taken to monitor the significant sustainability/
environmental effects of the implementation of the Joint Core Strategy**

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This SA Adoption Statement

1. Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of a Local Plan relating to development. SA incorporates the requirements for Strategic Environmental Assessment (SEA) and this Sustainability Appraisal/Environmental Statement for the Gloucester, Cheltenham & Tewkesbury Joint Core Strategy (GCT JCS) 2031 has been prepared in accordance with the following requirements:
 - Regulation 36 of the Town & Country Planning (Local Development) (England) Regulations 2004
 - Regulation 16 of the Environmental Assessment of Plans & Programmes Regulations 2004
 - Paragraph 165 of the National Planning Policy Framework 2012

For the purpose of this Statement that complies with planning and environmental assessment Regulations, the integrated appraisal will be referred to as the Sustainability Appraisal (SA).

2. The SA process comprises a number of stages that are designed to comply with the requirements of the SEA Regulations¹ and as guided through Government Planning Practice². This SA Adoption Statement satisfies the requirements for post adoption (Stage E) and demonstrates compliance with the requirements of the SEA Regulations as follows:

(a) how environmental considerations have been integrated into the plan or programme;

(b) how the environmental report has been taken into account;

(c) how opinions expressed in response to— (i) the invitation referred to in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;

(d) how the results of any consultations entered into under regulation 14(4) have been taken into account;

(e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and

(f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme

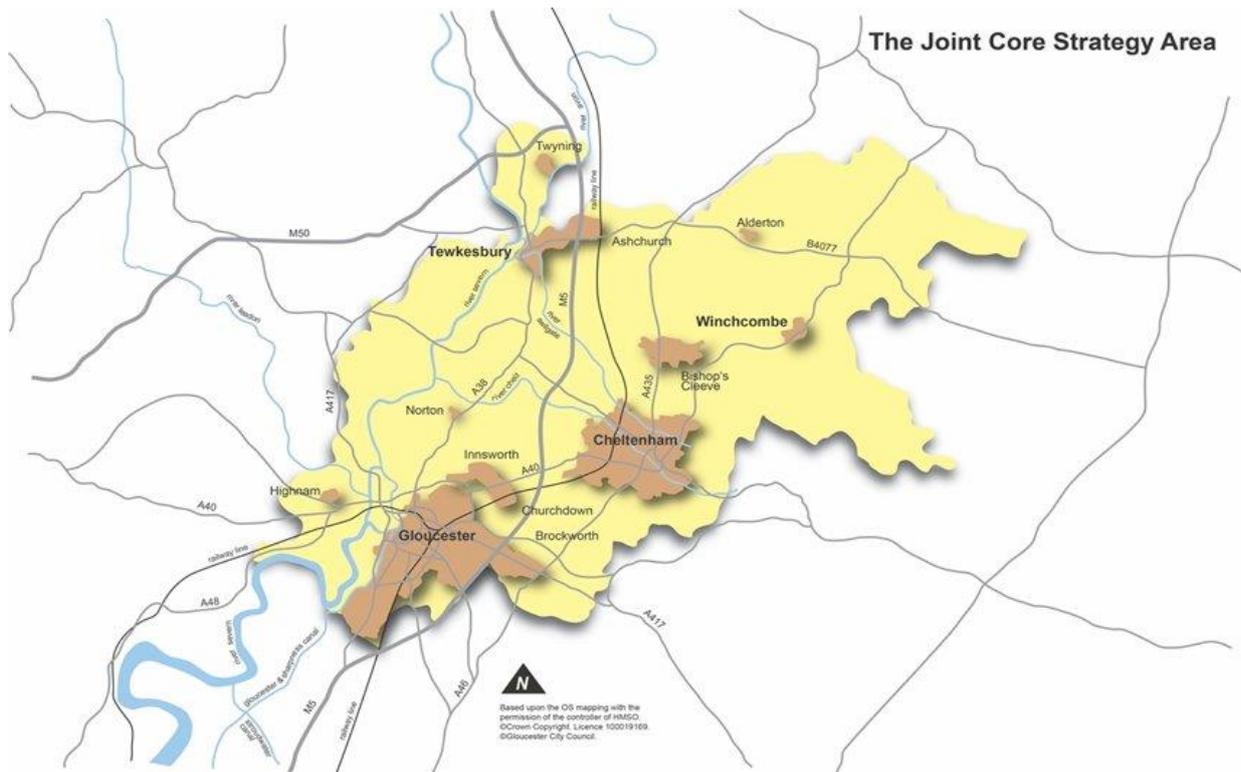
Development of the Gloucester, Cheltenham & Tewkesbury Joint Core Strategy

3. The Joint Core Strategy (JCS) is a partnership between Gloucester City Council, Cheltenham Borough Council, and Tewkesbury Borough Council,

¹ <http://www.legislation.gov.uk/uksi/2004/1633/contents/made>

² <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

supported by Gloucestershire County Council. The partnership was formed to produce a coordinated strategic development plan to show how this area will develop during the period up to 2031. The JCS provides the strategic direction for development in the wider JCS Area; each Council will prepare a Local Plan for non-strategic local development in its own area (and in conformity with the higher level JCS). The JCS is steered by Officers and elected Members from each of the three local authorities, and covers the area as shown in the following mapping³:



4. Considerable work and consultation has been undertaken since 2004-6 (early Joint Study Area studies) and 2007-9 (early JCS studies) to prepare the Joint Core Strategy, including SA/SEA in accordance with the NPPF (2012) and planning practice guidance. Various studies were undertaken to provide the evidence base to inform decision-making, including housing and employment needs; land availability; transport modelling and air quality assessments; retail; green space and recreational studies; landscape and visual sensitivity; Green Belt Review; historic environment; water cycle study and strategic flood risk assessments; infrastructure delivery studies, and assessments of potential strategic site options. The authorities have worked closely with other partners and neighbouring Councils, including Duty to Cooperate and in particular with Stroud and Wychavon Councils. Details of studies undertaken and the evidence underpinning the Joint Core Strategy are provided on the JCS website⁴.

³ <http://www.gct-jcs.org/Mapping/Home.aspx>

⁴ <http://www.gct-jcs.org/PublicConsultation/Gloucester,-Cheltenham-and-Tewkesbury-Joint-Core-Strategy-Examination-Document-Library.aspx> and <http://www.gct-jcs.org/Examination/Main-Modifications-Examination-Document-Library.aspx>

5. The plan has been developed through an iterative process with comments made through public consultation being taken into consideration at each stage from early JSA studies, issues and key questions, strategic options, draft strategic approach, developing the preferred option, draft JCS, pre-submission JCS, and submission. The JCS was submitted to the Secretary of State for independent Examination in November 2014.
6. There were 3 initial stages to the Examination Hearings (May 2015; July 2015, and January 2016). The Inspector's Interim Report (May 2016)⁵ acknowledged that substantial additional evidence had been submitted and discussions taken place such that proposals for significant amendments to the Pre-Submission JCS should be brought forward. Taking account of updated economic evidence, the Inspector concluded that an Objectively Assessed Housing Need of 33,500 dwellings is appropriate for the JCS area. A policy uplift of 5% making a total housing requirement of 35,175 dwellings was recommended in order to provide more certainty and choice for delivery.
7. The Proposed Modifications are mostly concerned with this uplift in housing requirements and meeting this need through strategic allocations. The Inspector suggested reconsideration of certain strategic options for development location and this was undertaken. Significant reductions in housing numbers resulted for the strategic site South of Cheltenham arising from concerns with regard to high landscape and visual sensitivity; the site was reduced to a capacity that is not strategic and will be addressed through the lower level Cheltenham Local Plan. A strategic site to the north of Gloucester was removed due to concerns about the Green Belt. A previously safeguarded strategic site at West Cheltenham was allocated as an urban extension and a new strategic site to the south-east of Gloucester allocated to help meet the uplift in housing need. A further key change was the reinstatement of site-specific development requirements for each strategic site allocation.
8. The Proposed Modifications to the JCS were subject to public consultation during November-December 2016, the Main Modifications in February-April 2017, and further considered at the resumed Examination in July 2017. The Planning Inspector's Final Report (October 2017) concluded that the Joint Core Strategy is sound, subject to the Main Modifications, and could be Adopted. At each stage of the development of the Joint Core Strategy, formal and public consultation was undertaken to help ensure that stakeholders' views were taken into consideration in the next steps of plan preparation. Issues raised and responses prepared have been documented during the development of the JCS and published on the Councils' website.
9. The Gloucester, Cheltenham & Tewkesbury Joint Core Strategy up to 2031 comprises the long-term vision and objectives for the area together with strategic policies for shaping and locating new development. The JCS provides the higher level or strategic part of the development plan for the

⁵ <http://www.gct-jcs.org/Documents/Examination-Document-Library-6/EXAM232---JCS-Inspectors-Interim-Findings---31052016.pdf>

area; more detailed, locally specific planning policies and non-strategic site allocations will be set out in the Local Plan for each of the three areas.

10. The JCS sets out the overall Vision and further describes what the vision means for each of the three areas, together with an explanation of the challenges for development planning. There are 9 Strategic Objectives to support and help deliver the vision, categorised according to each of the 3 ambitions – a thriving economy; a sustainable natural, built and historic environment; and a healthy, safe and inclusive community. The Spatial Strategy for the plan sets out the amount of development required and the distribution of new development. There are 15 sustainable development and 8 infrastructure policies to guide development, including protecting the natural and historic environments, and local communities. The Strategic Allocations Policy designates 7 Strategic Allocations on the edges of urban areas where large-scale proposals can use land efficiently; outline boundaries are provided together with site-specific development requirements. The final section of the JCS sets out the framework for monitoring the effectiveness of the JCS, including through the Authorities' Monitoring Reports, with indicators and targets.

How environmental & sustainability considerations have been integrated into the GCT Joint Core Strategy; How the Sustainability/Environmental Report has been taken into account

11. During the plan-making process, SA (incorporating SEA) has been carried out as an iterative and ongoing process to inform decision making for the developing Joint Core Strategy. The SA was undertaken in accordance with government guidance^{6 7} for a staged approach that integrates appraisal to consider the effects of the emerging plan on socio-economic as well as environmental factors. This SA is an integrated approach that includes the findings from the Habitats Regulations Assessment (HRA) and the Equality & Health Impact Assessment (EqIA) – both driven by different legislation and also reported separately. Since 2012, independent specialist consultants were appointed to carry out the SA for the Councils. They worked closely with the plan-making teams in an iterative way such that the findings and recommendations from the SA were integrated into each developing stage of the JCS.
12. The SA of the JCS used the same SA Framework developed during the SA scoping process as the basis for assessing the emerging plan - and as explained in Section 2 of the submitted SA Report (October 2014). Relevant plans/programmes had been reviewed; baseline information regarding the character of the area and its likely evolution collated and analysed; and sustainability problems, issues and opportunities had been identified during the SA scoping to compile a Framework of Objectives and Decision-Aiding

⁶ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

⁷ <http://www.pas.gov.uk/guidance>

Questions that seek to resolve the sustainability issues identified and relevant to the plan and the area. The assessment used both quantitative and qualitative assessments, including defined thresholds of significance, where possible.

13. The SA considered the likely significant effects of the implementation of the plan on the sustainability objectives for the Gloucester, Cheltenham & Tewkesbury area. For each aspect of the JCS, the assessment against the SA Objectives was recorded with a narrative provided describing any significant effects identified, mitigation of any significant negative effects, and any suggestions for enhancing potential beneficial effects. In line with requirements of the SEA Regulations, the appraisal considered effects including short, medium and long term, permanent, and temporary, positive and negative, secondary, cumulative and synergistic, wherever possible and relevant. Any gaps or difficulties were also reported.
14. The findings and recommendations of the SA informed plan-making and were integrated into the further development of the plan - and as set out in sections 6 - 8 of the Submitted SA Report (October 2014). Where relevant, the SA made recommendations for mitigating likely negative effects, for example, by suggesting refinements of policy wording. In particular, the findings of the SA helped inform the selection of potential strategic site allocations by identifying sustainability issues, likely negative and positive effects. This included identification of sensitive receptors and predicting the likely cumulative effects of proposed development for each authority area and for the JCS area as a whole.
15. The Initial SA Report (2011) made recommendations regarding which broad locations (and parts thereof) would be more sustainable. It also suggested where further detailed studies might be needed to provide more information and reduce uncertainties. As the broad locational areas were further studied for potential strategic allocations and subject to consultation, the SA made suggestions for site-specific wording to mitigate likely negative effects and enhance positive effects. For example, the SA recommended mitigation measures such as protecting mature hedgerows and priority habitats, landscape buffering, Green Infrastructure requirements, equality of access, and the need for further studies including noise impact assessments. A key recommendation at this stage was the suggestion for a separate policy requirement for the historic environment and including setting of assets and consideration of archaeological potential. Most of the suggestions and recommendations from the SA were progressed as the Core, Allocation and Delivery Policies were further developed and refined.
16. During 2013, the options for strategic allocations were further investigated including by SA and refinements made to policy that capture many of the SA recommendations, particularly through site-specific requirements. However, site-specific requirements were removed from the Submission version of the JCS. A number of recommendations from the 2013 SA work were taken into account in the revision of the policies in the Pre-Submission JCS. These included, for example, development that contributes to the vitality and viability of centres in SD3; additional environmental requirements for all major

development in SD4; clarification and strengthening of requirements for biodiversity in SD10; and additional wording to protect water quality in INF3.

17. After the early Examination stages in 2015-16, the Inspector advised an uplift in housing need to reflect updated economic evidence and proposed modifications to the JCS were developed to reflect this increase and to address matters discussed at the Hearings. The proposed changes and Main Modifications to the JCS arising from the Examination and issues discussed at the Hearings were subject to SA, reported, and subject to consultation.
18. The key changes were associated with providing the uplift in housing from 33,500 to 35,175 dwellings through changes to the strategic allocations. The SA considered the reasonable options possible and these were tested through new and refreshed appraisals that were fully reported in the SA Addendum Report (October 2016) that accompanied the Proposed Modifications on consultation. The changes included removal of 2 strategic allocations and inclusion of 2 new allocations, together with reinstatement of site-specific and infrastructure requirements, and updated evidence.
19. Generally, the refreshed SA found that the changes to the JCS confirmed the positive effects that had been identified, particularly for housing and community objectives. The modifications strengthen and confirm implementation of mitigation measures, particularly due to the re-instatement of site-specific and infrastructure requirements that require protection or enhancement of environmental and heritage assets. This improved the overall sustainability of the JCS, including mitigating the negative effects previously identified through the SA, especially with regard to landscape/visual amenity; and transport. It further confirms mitigation and potential enhancement for effects on biodiversity and green infrastructure.
20. The SA reports have been available on the Councils' JCS website and at each stage, the responses to comments made and issues raised have been reported. Throughout, the appraisals have been proportionate and appropriate to the stages of plan-making. Thus, environmental and sustainability considerations have been integrated and the SA Reports taken into account throughout the plan-making process.

How the results of consultation have been taken into account

21. Consultation is an important aspect of SA and there was statutory and public consultation at each key stage of the JCS preparation and the SA as follows:

JCS Stage and Documents Consultation	SA/SEA Stage and Documents Consultation
Joint Study Area (JSA) studies 2004-6 Public consultation Jan- Feb 2005	Strategic SA (SSA) of JSA area informed SSA of sub-regional area in emerging SW Regional Spatial Strategy (RSS)

	RSS SSA statutory & public consultation Jan 2006
JCS Evidence gathering	SA/SEA Scoping Report Oct 2008 Five weeks statutory & public consultation Final SA/SEA Scoping Report Nov 2009
JCS Issues & Key Questions Public consultation Nov 2009 – Feb 2010	Consultees invited to consider relevant SA objectives for each issue and question. Nov 2009 – February 2010
JCS Strategic Options (addressing climate change, economic resilience, and stronger communities) for overall approach to distributing development in line with RSS; preferred urban focus. Stakeholder consultation Feb-March & July 2010	Comparative SA/SEA summary with symbols for the 3 strategic options set out in Table 7 of Initial SA Report Dec 2011. Public consultation Dec 2011-Feb 2012
JCS Part 1 draft strategic approach (spatial portrait, issues, vision, strategic objectives); Informal on-line public consultation June-Aug 2010	SA compatibility analysis of Strategic Objectives against SA objectives reported in Tables 4 & 5 of Initial SA Report Dec 2011. Public consultation Dec 2011-Feb 2012
JCS Developing the Preferred Option - scenarios A, B, C, D; broad Locations (9 around periphery of Gloucester, 6 in Cheltenham, 6 in Tewkesbury) 3 approaches for next phase (maximising economic, preventing coalescence, best use of existing infrastructure) Public consultation Dec 2011- Feb 2012	Detailed SA undertaken of each Broad Location & Scenarios A-D (4 different quanta of development) summarised in Table 8 (p19 -26) and detailed in Appendix 4 of the Initial SA Report Dec 2011. Public consultation Dec 2011-Feb 2012
Draft JCS – vision, strategic objectives, preferred strategic approach, strategic allocations, strategic, core and delivery policies Public consultation 15 October – 25 November 2013	SA Report (2013) building upon the previous SA work and responses received to previous public consultation. SA of 3 Strategic Options for Distributing Development, options for potential Strategic Allocations, strategic, core and delivery policies, summarised in main report, detailed in Appendices VI - IX. Public consultation 15 October – 25 November 2013
Pre-Submission Draft JCS Public consultation Summer 2014	SA Report Public consultation Summer 2014

Submission JCS Submission to Secretary of State November 2014	Submission SA Report (October 2014) Submission to Secretary of State November 2014
Examination Stage 1 May 2015; Stage 2 July 2015; Stage 3 January 2016	Examination Stage 1 May 2015; Stage 2 July 2015; Stage 3 January 2016
Inspector's Interim Report (May 2016)	
Proposed Main Modifications to JCS Public Consultation 27 February 2017 – 10 April 2017	SA Addendum Report (October 2016) Public Consultation 27 February 2017 – 10 April 2017
Examination Resumed for Proposed Modifications 11-21 July 2017	Examination Resumed for SA of Proposed Modifications 11-21 July 2017
Main Modifications & Consultation comments received considered by Inspector	SA of Main Modifications & comments received considered by Inspector
Adoption of Joint Core Strategy September 2017	SA/SEA Adoption Statement September 2017 (this document)

22. SA and consultation responses have been considered in an iterative and ongoing way with the plan-making process and in accordance with the requirements of the SEA Regulations. Representations have been recorded and the responses made to suggestions, issues and concerns raised have been published, including at key statutory stages, as follows:

- Appendix V of Submission SA Report (October 2014) summarises comments received and the Councils' for 2011, 2013 & 2014 responses including those made on the SA Scoping consultation
- Appendix B of SA Addendum Report (October 2016) including comments received through Hearing Statements at Examination Stages 1-2 (May & July 2015)

All representations to public consultation and comments made through Hearing Statements for the Examination are available to view on the Councils' website⁸.

23. Issues raised on the Submission SA included queries regarding the selection and assessment of reasonable alternatives, and the significance of some effects predicted for strategic site options. These matters were discussed at the Examination Stages 1 & 2 and addressed through the SA Addendum Report (October 2016).

⁸ <http://www.gct-ics.org/PublicConsultation/> and <http://www.gct-ics.org/Examination/Examination.aspx>

24. Representation on the updated HRA (October 2016) accompanying the Proposed Modifications to the JCS from the environmental regulator Natural England (NE) advised the JCS Authorities of a recent High Court Judgment regarding NE advice on in-combination assessment and air quality from vehicle emissions and nitrogen deposition effects on European sites. This was investigated and a HRA Note⁹ prepared. This concluded that the findings of the strategic HRA reported in 2013, 2015 & 2016 remain relevant and valid; the Submitted and Proposed Modifications to the JCS will not have any adverse effects, either alone or in-combination, on the integrity of the identified European sites.
25. At the resumed Examination Hearings in July 2017, the Inspector requested the implications for the SA of updated transport evidence and a SA Note¹⁰ was prepared. This concluded that the SA findings were not changed. Overall, policies are in place to deliver the mitigation that will reduce the likely negative effects of new development on SA objectives for transport and air quality.
26. Thus, the results of consultation have been taken into account at each stage of plan-making and SA/SEA – in an iterative and ongoing way – responding to issues as they are raised through consultation.

Reasons for choosing the Joint Core Strategy as adopted, in the light of other reasonable alternatives

27. The SEA Regulations require assessment of the likely significant effects of implementing the plan and “reasonable alternatives” taking into account the objectives and geographical scope of the plan; and the reasons for selecting alternatives should be outlined in the Report. Extant SA/SEA guidance advises that the term “reasonable alternative” should be taken to mean “realistic and relevant” i.e. deliverable and within the timescale of the plan.
28. At each stage of the development of the JCS, all strategic options and any reasonable alternatives to policy and site allocation proposals have been considered and assessed through SA/SEA. Options for the Spatial Strategy were considered early at the JCS Issues & Key Questions stage in 2009. During the Developing the JCS Preferred Option reported in 2011, 3 spatial options, 4 scenarios for housing growth, and 21 broad locations for potential strategic allocations were tested through SA. The findings of the SA and the reasons for progressing or rejecting options were set out in Section 6 of the Submission SA Report (October 2014).
29. The do-nothing scenario is not an option for a local plan as Councils are required to provide for identified development needs; however, this was

⁹ <http://www.gct-jcs.org/Documents/New-Evidence-Base-and-Associated-Documents/Main-Modifications-Examination-Document-Library/MM27-HRA-Note-14072017.pdf>

¹⁰ <http://www.gct-jcs.org/Documents/New-Evidence-Base-and-Associated-Documents/Main-Modifications-Examination-Document-Library/MM36August2017SANoteDS5DS7Transport.pdf>

considered by the SA process and the SA reported that significant negative effects on environmental factors were likely without a plan and that positive effects for socio-economic factors were less likely to be implemented.

30. Reasonable alternatives continued to be identified and further refined during the preparation of the draft JCS in 2012-13. Three strategic options for distributing development were revisited and tested through SA and the emerging strategic allocation options were subject to detailed SA. This is set out in Section 7 of the Submission SA Report and the reasons for progressing or rejecting options are outlined in Table 7.2. Further changes from the Pre-Submission to Submission version of the JCS were considered with regard to alternatives and reasons for progressing or rejecting options are outlined in Table 8.1 of the Submission SA Report. Reasonable alternatives were further considered and subject to SA during the preparation of the Main Modifications; the reasoning for progressed the preferred changes was discussed in the SA Addendum Report (October 2016).
31. Overall, the reasons for choosing the Joint Core Strategy as adopted include that the adopted plan progresses the Vision, Objectives, and Strategy for high quality development planning in the GCT area with the most benefits and the least negative effects for sustainable development. The JCS also sets the appropriate overarching strategic framework for development planning and within which the Local Plans can be developed for Gloucester, Cheltenham and Tewksbury.

Measures that are to be taken to monitor the significant sustainability & environmental effects of the implementation of the Joint Core Strategy

32. The SEA Regulations require that the significant environmental effects of implementing the plan should be monitored with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action. Local Planning Authorities are required to produce Authority Monitoring Reports¹¹ on the progress of Local Plans. Government Guidance on SA/SEA advises a pragmatic approach with shared monitoring for the SA/SEA and the Plan. The GCT JCS Monitoring Framework includes a wide range of indicators that also relate to the SA Framework. It is considered that these indicators will be sufficient to identify any unforeseen adverse effects at an early stage, and provide information on the predicted effects from the SA. Monitoring of the GCT JCS will be available to view on the Councils' website.

For further information, please refer to the Gloucester, Cheltenham & Tewkesbury Joint Core Strategy website:

<https://jointcorestrategy.org/>

¹¹ <https://www.gov.uk/guidance/local-plans--2>

Accountable member	Councillor Andrew McKinlay, Cabinet Member Development and Safety
Accountable officer	Tracey Crews – Director of Planning Philip Stephenson – Development Manager (Strategy)
Ward(s) affected	All
Executive summary	<p>All local authorities are under a statutory obligation to prepare a development plan. Cheltenham Borough Council has chosen to do this through the preparation of two main development plan documents; the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) and the Cheltenham Plan. Together the two plans will provide the planning framework for the Borough until 2031, along with Gloucestershire minerals and waste plans and any neighbourhood plans made.</p> <p>Work to progress the development of the Cheltenham Plan has been underway since 2012. In summer 2013 consultation took place on the scope of the plan and the Council went on to publish the plan's draft vision and objectives in February 2014. This was followed by the preparation of an Issues and Options document which was subject to public consultation in June 2015.</p> <p>The Issues and Options identified what the Council considered to be the main planning issues and policy options available to deliver both the vision and objectives of the Cheltenham Plan itself and the Council's own corporate vision. Comments received as part of that consultation influenced the contents of the Preferred Options which were made available for public consultation in January 2017. This stage of consultation gained a good deal of response and was very useful in gathering the views of the public and stakeholders in relation to key subject areas.</p> <p>At this time, it was envisaged that the Cheltenham Plan would comprise two parts – Part One (which was subject to the January 2017 consultation exercise) covered some of the most significant topics, namely, Employment; Local Green Space; and development allocations for residential and mixed-use sites. Part Two, which would cover all remaining topics, was intended to follow later in 2017.</p> <p>However, following discussions with the all-party Planning Liaison Member Working Group and the Planning Inspectorate in August 2017, the plan preparation process was refined to be more streamlined and resource efficient. The result is the document being placed for approval by Council today i.e. the pre-submission draft of the Cheltenham Plan. This is the version of the Plan that, subject to Council's approval, will be issued for formal publication prior to submission for examination by the Secretary of State in 2018.</p>

Councillors will note that the Cheltenham Plan now comprises a single document that embodies all relevant topic areas including those consulted upon as part of consultation at Preferred Options stage. The document draws heavily on the policy context provided by the JCS and relies upon the JCS having reached adoption before publication of the Pre-Submission Cheltenham Plan can take place.

The publication of the Pre-Submission Cheltenham Plan includes a representations procedure whereby representations may be made by any person about the plan such as whether they support the policy approach in each topic / geographical area based on the evidence provided and the requirements of national planning policy and guidance. This will not provide an opportunity for JCS issues to be revisited and any objections received on the basis of JCS policy or its supporting evidence will therefore be discounted.

The Cheltenham Plan Project Initiation Document (PID) was agreed by Planning and Liaison Member Working Group in October 2014 and has been updated with due reference to the Group as necessary and appropriate throughout the plan preparation process. The PID sets out the direction and timetable for the Cheltenham Plan's preparation and advancement and reflects the timetable included in the Local Development Scheme which was last updated in October 2017.

Recommendations

- 1. That the Cheltenham Plan 2011-2031 (pre-submission version) set out in Appendix 2, be approved for publication under regulation 19 of the Town and Country Planning (Local Planning)(England) Regulations 2012**
- 2. That Council delegates authority to the Director of Planning, in consultation with the Cabinet Member Development and Safety to make any minor amendments to the document prior to publication of the Pre-Submission Cheltenham Plan;**
- 3. That, following publication, the Pre-Submission Cheltenham Plan be formally submitted to the Secretary of State (as the submission plan) along with all representations received as a result of the pre-submission publication exercise.**

Financial implications

There is a one-off budget of £107,230 held in a council reserve, earmarked to support the costs of implementing the Cheltenham Plan. The development of this plan, public consultation and publication costs can be met from this reserve.

Contact officer: Sarah Didcote
sarah.didcote@cheltenham.gov.uk 01242 264125

<p>Legal implications</p>	<p>The Council is required to have an up to date development plan for its area and must prepare it in accordance with legislative requirements, including ensuring the compliance with the Statement of Community Involvement.</p> <p>The development plan for Cheltenham Borough being the development plan documents (taken as a whole) which have been adopted or approved in relation to the area and the neighbourhood development plans which have been made in relation to that area.</p> <p>Under regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 before submitting a local plan to the Secretary of State for independent examination the Council must make a copy of all the proposed submission documents and a statement of representations procedure available via: their website; their principal office and such other places within their area as they consider appropriate; for a period of at least 6 weeks.</p> <p>The proposed submission documents are to be the local plan which the Council proposes to submit to the Secretary of State; a submission polices map where the local plan if adopted would result in changes to the adopted polices map; a sustainability appraisal report of the local plan; a statement setting out the consultations already undertaken prior to the regulation 19 publication stage; a summary of the main issues raised by those representations and how those main issues have been addressed in the Pre-Submission local plan; and such supporting documents as in the opinion of the local planning authority are relevant to the preparation of the local plan.</p> <p>The statement of representations procedure must include the date by which representations about the local plan must be received and the address to which representations about the local plan must be made (representations may be made in writing or by way of electronic communications).</p> <p>In addition to the proposed submission documents, on submission for independent examination the Council must also send a statement setting out as regards the regulation 19 Pre-Submission publication, the number of representations received in accordance with the representations procedure, copies of those representations and a summary of the main issues raised in those representations.</p> <p>If to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published (as the case may be).</p> <p>Legislation requires that where a development plan document contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy.</p> <p>Contact officer: Cheryl Lester cheryl.lester@tewkesbury.gov.uk 01684 272013</p>
<p>Corporate and community plan Implications</p>	<p>The Cheltenham Plan supports and is referenced by the Corporate Strategy and wider community planning.</p>

Property/Asset Implications	<p>The removal of the Green Belt between the West Cheltenham and North West Cheltenham Strategic Allocations in the JCS has implications for land which is owned by the Borough Council including the site known as 'Arle Nurseries' (which straddles the administrative boundaries of Cheltenham Borough and Tewkesbury Borough). This area is being put forward as a housing allocation in the Cheltenham Plan. The Borough Council also owns land at Priors Farm and Royal Well, amongst others. These sites are being allocated for mixed use development in the Cheltenham Plan. Any proposals for these sites would need to be sustainable and in accordance with the development plan as a whole.</p> <p>Contact: Head of Property David Roberts, david.roberts@cheltenham.gov.uk 01242 264151</p>
HR implications (including learning and organisational development)	<p>There are no direct staffing or Trade Union implications.</p> <p>Contact officer: Julie McCarthy 01242 264 355 julie.mccarthy@cheltenham.gcsx.gov.uk</p>
Key risks	<p>Corporate risk CR81: If the Council does not progress as quickly as possible to preparing the Cheltenham Plan, the Borough will be exposed to the risk of inappropriate development.</p>
Environmental/Social/Equality Implications	<p>Corporate Action ENV 6: We will commence preparation of a Cheltenham Plan.</p> <p>Progressing with this stage of the Cheltenham Plan will allow the Cheltenham Plan to progress in accordance with the timescales set out in the project initiation document.</p> <p>The Cheltenham Plan is subject to Sustainability Appraisal which alongside responses received as a result of public consultation thus far, has informed the selection of options and sites as part of the plan-making process.</p>

1. Background

- 1.1 All local authorities are under a statutory obligation to prepare a development plan. Cheltenham Borough Council has chosen to do this through the preparation of two development plan documents; the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) and the Cheltenham Plan. Together the two plans will provide the planning framework for the Borough until 2031 along with Gloucestershire minerals and waste plans and any neighbourhood plans made.
- 1.2 Since the adoption of the Cheltenham Borough Local Plan (2006), national planning policy and guidance have been updated and condensed into a more readable form. Alongside these changes the Government has abolished regional and county strategic level planning and the Council has entered collaborative working on the JCS (which is being presented for adoption at today's Council meeting).
- 1.3 Many of the requirements set out in regulations concerning the contents of a local plan have already been met by the progression of the JCS. For example, the JCS identifies objectively assessed development need for the area and sets out requirements for strategic sites. The JCS

also contains a suite of strategic policies on issues as design, heritage and the provision of infrastructure. The National Planning Policy Framework (NPPF) and national Planning Practice Guidance (PPG) provide detailed planning policy direction and the government is clear that this guidance should not be duplicated at a local level.

2. The new Cheltenham Plan

- 2.1** Work on developing the Cheltenham Plan has been taking place since 2012. At times this has slowed due to the need to focus resources on JCS preparation but since 2016, greater momentum has been achieved and this has culminated in the pre-submission draft document being placed before councillors today. Throughout all stages in the preparation of the Cheltenham Plan, the community and stakeholders have been engaged so that the plan which has emerged reflects their aspirations wherever possible whilst also having regard to the parameters and requirements set by national legislation and guidance as well as the context set by the JCS.
- 2.2** The development of the Cheltenham Plan is guided by a project initiation document (PID) agreed by Planning and Liaison Member Working Group (PLMWG) on the 15th of October 2014 and updated with reference to the Group at key stages as necessary and appropriate. The PID was last updated in August 2017. Drafting of the Plan's contents has been undertaken in collaboration with councillors through PLMWG which has convened approximately every 4-6 weeks and has been an effective way to ensure that the document is democratically steered, remains on schedule and will be relevant and effective once adopted.
- 2.3** The Cheltenham Plan was originally intended to comprise two parts. Part One covered some of the most significant topics, namely, Employment; Local Green Space; and development allocations for residential and mixed-use sites, and was subject to a non-statutory period of public consultation in January 2017. Part Two, which would cover all remaining topics, was intended to follow later in 2017. Each part would have been subject to regulation 19 publication separately and then brought together after the respective publication exercises and examined as a whole.
- 2.4** However, following discussions with the Planning Inspectorate in August 2017 and subsequent agreement by PLMWG, the plan preparation process was refined to provide a more streamlined and resource efficient approach. This is also in line with the view of how the plan would be carried forward in the scoping consultation. The amended process entails producing a single document that embodies all relevant topic areas including those already consulted upon as part of the Preferred Options stage.
- 2.5** In accordance with Government guidance, the Plan is more concise than historically produced local plans and draws heavily on the policy context provided by the JCS. It is therefore important that both the JCS and Cheltenham Plan are read together in order to ascertain the complete policy response to a particular matter. The JCS provides the higher-order strategic context whilst the Cheltenham Plan provides the second tier response, addressing any policy gaps, and providing a more local level of detail as necessary and appropriate. The Planning Inspectorate has confirmed that under the above approach, the legislative requirements pertaining to local plan preparation will continue to be met.
- 2.6** The guiding principles for Cheltenham Plan production have taken account of the need for clarity and brevity. In this respect, the Plan avoids duplication with the JCS as much as possible, especially in terms of background information and scene setting. Whilst an amount of background information remains necessary to help justify the policy response, much of this will be advanced through background papers and topic papers.
- 2.7** After adoption, the Planning Team will embark on a programme of Supplementary Planning Document (SPD) preparation. These documents will expand upon Cheltenham Plan policy and provide more detailed advice and guidance on how certain policies will be implemented. This is particularly the case in regard to the work on conservation area management plans which will be published as SPD soon after the adoption of the Cheltenham Plan. Whilst SPDs are not part of the development plan and are not subject to examination, they are an important consideration in

determining planning applications. A number of SPDs already exist and are published on the Council's website; these will be retained / updated as part of this process.

3. Reasons for recommendations

- 3.1** The document being presented for approval by Council today is the pre-submission draft of the Cheltenham Plan 2011-2031. This is the version of the Plan that, subject to Council's approval, will be issued for publication prior to formal submission for examination by the Secretary of State in 2018. It is also known as the Regulation 19 version of the Plan reflecting the relevant stage as defined by the Town & Country Planning (Local Planning) (England) Regulations 2012.
- 3.2** It is a requirement to have an up to date development plan in place for the Borough. The Cheltenham Plan, in conjunction with the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy, will enable the Council to fulfil this requirement. Approving the pre-submission document for publication will allow further progression of the Cheltenham Plan along a clearly defined process and will mark a significant milestone in the Plan's progression which will afford it increasing weight as a material consideration in the determination of planning proposals.
- 3.3** The document identifies a variety of social, environmental and economic issues being faced by the Borough at the present time and puts forward an appropriate policy response to help address those issues over the plan period. The document identifies land for development which through technical studies has been found to be able to accommodate different uses. The suitability of those uses has been confirmed as part of the iterative process of Integrated / Sustainability Appraisal subject to certain safeguards and development being undertaken in a particular manner. The document also identifies areas to be designated and protected as 'Local Green Space'.
- 3.4** The Plan is underpinned by an extensive body of evidence. There are areas where additional work is being carried out, which includes landscape, transport, flood risk and ecology. Key findings of this work are available now, but the full reports will accompany publication of the Pre-Submission Cheltenham Plan.
- 3.5** The publication of the Pre-Submission Cheltenham Plan includes a representations procedure whereby representations may be made by any person about the plan, such as whether they agree with the policy stance of the Plan and whether identified sites are appropriate for the allocations proposed. Any objections will need to take account of the supporting evidence for the plan and the reasoned justification for each policy or proposal.
- 3.6** It will not provide an opportunity for JCS issues to be revisited and any objections received on the basis of JCS policy or its supporting evidence will be discounted.

4. Interim arrangements

- 4.1** The indicative timetable for the remainder of the plan preparation process is set out at Para 6.1 below. It will be noted that whilst the plan is expected to gain weight as a material consideration in decision making over the coming months, adoption is not anticipated until the end of 2018. This being the case, all saved policies from the 2006 adopted Borough Local Plan (save to the extent superseded by the JCS) will remain part of the development plan until that time.
- 4.2** The weight of any particular 2006 policy which has not been superseded by the JCS, will depend on whether it still accords with the policy stance of the JCS (conflicts in development plan policies are to be resolved in favour of the most recently adopted policy) and its degree of consistency with the NPPF.
- 4.3** In terms of retail, the 2006 policies will continue to be used beyond adoption of the new Cheltenham Plan (subject to relevance and due weight) because a comprehensive retail review needs to be undertaken for the JCS area. No new retail policy is therefore being proposed through the Cheltenham Plan at this time. This follows with the direction given to the JCS

authorities by the inspector in the JCS examination as to how retail should be dealt with.

5. Consultation and Feedback

5.1 Consultation (including internal consultation within the Authority) has been undertaken on the Cheltenham Plan at each of the various stages of preparation and, where appropriate, the comments received have helped shape the plan and its contents. The following illustrates the primary mechanisms and events that have contributed:

- Planning and Liaison Member Working Group (PLMWG) – a cross party group with a remit to consider and advise on the emerging Cheltenham Plan and provide guidance and feedback to Planning Committee, Cabinet and Council as appropriate. Through regular meetings, the Working Group has had a number of opportunities to comment and shape working drafts of the document. Meetings have also been held with other elected members (not part of PLMWG) and each of the political groups that requested an individual update.
- Internal officer working group - comprising officers from across the Council with a remit to consider, advise and inform the emerging Cheltenham Plan, requesting information from and providing feedback to individual teams as appropriate. This group has had the opportunity to feed into the draft scope, visioning and objectives consultation and has been kept informed on subsequent progress with the plan.
- Liaison with the Strategy and Engagement team to ensure that the Cheltenham Plan aligns with the Corporate Strategy and that consultation responses are elicited as widely as possible across the Borough.
- The Cheltenham Taskforce – regular updates and discussions have taken place between the Taskforce and officers leading the preparation of the Cheltenham Plan. This has also allowed detailed feedback and inclusion of policies and wording from the economic development and place strategy groups within the Council .
- Cheltenham's parishes and communities have been kept up to date on latest developments with the Plan through updates to the regular 'C5' and meetings of the Neighbourhood and Community Group Chairs.
- Feedback from the Cheltenham Plan Scoping consultation (July –September 2013).
- Feedback from the Issues and Options Consultation (June – August 2016).
- Feedback from the Preferred Options Consultation (January - February 2017). Approximately 600 comments have been uploaded to the Council website and are summarised by way of a Consultation Report which is also available to view on the website.

5.2 Publication of the pre-submission Cheltenham Plan is scheduled to take place in early 2018 with members of the public and stakeholders being given a period of 8 weeks to make representations. Representations will be invited from all contacts on the Planning Policy Local Plan database and copies of the Plan will be made available electronically via the Council's website and in paper format at the Council's deposit locations. Efforts will be made to ensure the public, local businesses, statutory consultees and other stakeholders are aware of the publication and representation procedure through media releases, engagement with parish and neighbourhood groups, and via Council networks to alert groups to help cascade information. A number of public consultation events will occur, likely to centre on busy times, which could include displays at the Regent Arcade and Municipal Offices and other locations.

6. Performance management – monitoring and review

- 6.1** The indicative timetable for the remainder of the Cheltenham Plan process is set out below:
- Early 2018: 8 week consultation on the pre-submission Cheltenham Plan
 - Spring 2018: Submission to the Secretary of State
 - Autumn 2018: Examination in Public
 - Winter 2018: Adoption
- 6.2** Responses received pursuant to the regulation 19 publication representations procedure will be forwarded to the Secretary of State on submission for independent examination (together with a statement of the number of representations received and a summary of the main issues raised in those representations). .
- 6.3** After adoption, the Council will regularly monitor the effectiveness of the Plan as part of the planning and development process and will use the results to review policies and practices if necessary. Any revisions to the Plan thereafter would need to be reflected by an amendment to the Local Development Scheme (LDS).
- 6.4** Performance against LDS milestones is monitored through the Authority's Monitoring Report (AMR) which is prepared annually.
- 6.5** The LDS was last updated and approved by Cabinet in October 2017.

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<p>Appendices</p>	<ol style="list-style-type: none"> 1. Risk Assessment 2. The pre-submission Cheltenham Plan 2011-2031 3. Integrated Appraisal 4. Consultation Report 5. Cheltenham Plan maps not included in the main document: <ul style="list-style-type: none"> <u>Local green space:</u> https://www.cheltenham.gov.uk/downloads/download/1527/cheltenham_plan_-_local_green_space <u>Key employment land (not otherwise included in the main body of the plan) :</u> https://www.cheltenham.gov.uk/downloads/download/1529/cheltenham_plan_-_key_existing_employment_land <u>Small Changes to the Principal Urban Area (PUA) Boundary:</u> https://www.cheltenham.gov.uk/downloads/download/1530/cheltenham_plan_-_principal_urban_area_pua_edits <u>Conservation areas and amendments:</u> https://www.cheltenham.gov.uk/downloads/download/1533/cheltenham_plan_-_conservation_areas <p>Other Cheltenham Plan downloads and relevant evidence – later documents at the bottom of page https://www.cheltenham.gov.uk/downloads/46/planning_policy</p>
<p>Background information</p>	<p>Background information and updates on previous consultation can be found at https://www.cheltenham.gov.uk/info/1004/planning_policy</p>

Risk Assessment

Appendix 1

Corporate Risk	Corporate Risk Owner	Proposed Action	Original Impact	Original Likelihood	Original Score	Current Impact	Current Likelihood	Current Score	Control	Risk Control Process	Corporate Risk Manager	Corporate Risk Last Updated	Target Impact	Target Likelihood	Target Score	Target Date
CR81 – If the Council does not progress as quickly as possible to preparing the Cheltenham Plan, the Borough will be exposed to the risk of inappropriate development.	Tracey Crews	Scrutiny Task Group set up to advise and challenge on the development of the Cheltenham Plan.	3 - Marginal	4 - Moderate	12	3 - Marginal	4 - Moderate	12	Reduce	The Pre-submission Plan slipped from being presented to Council in September 2017 as JCS matters have needed to take precedence. However, with a streamlining of the plan preparation process being agreed with PINS in August 2017 and with revisions to the Local Development Scheme being approved in October 2017, the Plan is now on target to be released for Pre-Submission publication in early 2018.	Philip Stephenson	01/09/16	3 - Marginal	4 - Moderate	12	30/01/18

CHELTENHAM PLAN

PRE-SUBMISSION VERSION

DECEMBER 2017

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FOREWORD

1. INTRODUCTION

WHAT IS THE CHELTENHAM PLAN?

- 1.1. The Cheltenham Plan, together with the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy, the Gloucestershire Minerals and Waste Local Plans and any neighbourhood plans made in the future will, when adopted, comprise the statutory development plan for Cheltenham up to 2031. Whilst the development plan is primarily concerned with land-use planning, it is a shared project that will support delivery of many of the Council's outcomes set out in its Corporate Strategy.

SUPPORTING EVIDENCE BASE

- 1.2. All development plans are required to be supported and justified by robust evidence. Gathering evidence is a critical part of the plan-making process. The Cheltenham Plan is supported by a wealth of supporting information, including the sustainability appraisal, habitats regulations assessment, equalities impact assessments and flooding, landscape and transport studies amongst others. The sustainability appraisal and associated assessments are an integral part of the whole process and has helped inform the contents of the Plan as it has evolved over time. At each stage they will have influenced the content of the document by testing the policy options and potential site allocations for their contribution towards each of the sustainability objectives.

PURPOSE OF THE DOCUMENT

- 1.3. The stage of the process that is currently being consulted on is the pre-submission stage and is the final version of the plan before being sent to the Planning Inspectorate for consideration. All comments made during the consultation period will be sent to the Planning Inspectorate to be considered by the appointed planning inspector. The results of the previous consultations detailed below have helped the Council to 'narrow down' the alternatives available in meeting the Plan's strategy. Having considered the relevant evidence, including sustainability appraisal and the findings of the JCS, the Plan is now presented as a whole with policies that will inform application decisions along with broader spatial policies for Cheltenham Borough as a whole.

CONNECTION TO THE JCS AND OTHER PLANNING DOCUMENTS

- 1.4. In a plan-led system, the development plan and neighbourhood plans set out the overarching context and specific policies that are used to manage and guide development through the decisions the Council makes on planning applications. The development plan also sets out higher-level objectives and aspirations that aim both to conserve what is valued and cherished within Cheltenham and to encourage development in spatial and policy areas the Council wishes to promote in the public interest.
- 1.5. Since the adoption of the Cheltenham Borough Local Plan Second Review (2006) national planning policy has been rewritten and condensed into a more streamlined and accessible format. The emergence of a National Planning Policy Framework (NPPF) has also been complemented by the publication of extensive national Planning Practice Guidance (nPPG). Developed through these changes, the Councils' strategic planning document, the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) was, found sound in October 2017 and is awaiting adoption by the three authorities.
- 1.6. The above changes have meant that many of the requirements set out in regulations concerning the contents of a local plan have already been met. For example, the JCS identifies objectively assessed housing need for the area and sets out requirements for strategic sites. The JCS also contains a suite of strategic development management policies on issues such as design, heritage and the provision of infrastructure.
- 1.7. The NPPF and nPPG provide detailed planning policy direction which is explicit in stating that this guidance should not be duplicated at a local level. The JCS picks up the strategic elements of policy but does not always provide local detail. This is why there is a need for the Cheltenham Plan to follow closely on from the adoption of the JCS. Therefore, for all policy topics except retail, the JCS along with this Cheltenham Plan replace all policies found in the Cheltenham Borough Local Plan Second Review (2006).
- 1.8. The JCS authorities have agreed to undertake an immediate review with regards to Retail. Therefore until such time as the retail review can be adopted by the JCS authorities the existing retail policies within the Cheltenham Borough Local Plan (2006) will continue to be used. This is consistent with the wording of JCS policy SD2 which was subject to detailed examination.
- 1.9. It would not be possible to develop district plan policies for retail without taking into account the strategic context, but it would also not be reasonable to delay the production of the Cheltenham Plan until the review is concluded. Therefore during the writing of the Cheltenham Plan it was agreed to defer consideration of retail to

this wider review. The JCS retail review will cover both strategic and local polices for retail in Cheltenham as part of its remit.

WHAT HAS HAPPENED PREVIOUSLY

- 1.10. Work on the preparation of the Cheltenham Plan began in 2012. During that time engagement with the community and stakeholders took place to inform what the future contents of the Cheltenham Plan should be and how it should be progressed. This is part of a process known as scoping and is one step in meeting the statutory requirements for the preparation of a development plan document. The scoping document was subject to an eight week public consultation ending 2 September 2013.
- 1.11. Scoping and development of the Plan's vision and objectives was followed by publication and consultation on the Issues and Options Report in June 2015. This stage in the process identified what the Council considered to be the main planning issues and policy options available to help deliver both the vision and objectives of the Plan and the Council's own corporate vision.
- 1.12. Following the Issues and Options consultation a further round of consultation took place which presented the Preferred Option consultation. This was informed by previous consultation responses and further evidence base work, which allowed the overarching strategy to be narrowed down and become more focussed. The consultation took place in February/March 2017 and ran for 6 weeks.
- 1.13. Originally it was intended that the Cheltenham Plan should be formed in two parts. Part one was to be developed first detailing allocations for housing and economic development along with designations of Local Green Space and accompanied by an economic strategy. Part two would follow which would contain all development management policies and cover the remaining subject areas. However, with the Joint Core Strategy schedule being delayed it has been possible to present both parts one and two as a whole in the pre-submission document.

TIMELINE



WHAT HAPPENS NEXT?

- 1.14. Following the close of the pre-submission consultation, the responses will be submitted to the Planning Inspectorate. The pre-submission consultation will last for 8 weeks and will begin early in 2018. Therefore, submission is likely to take place during spring 2018, with an expected Examination in Public during summer 2018. As many of the strategic level issues have already been agreed through the Joint Core Strategy Examination in Public it is hoped that the examination process for the Cheltenham Plan will not be lengthy, however an exact time scale cannot be defined.

1. VISION AND OBJECTIVES

- 1.1. Following the scoping consultation in 2013, the Council published a draft vision and objectives for the Cheltenham Plan in February 2014. The draft vision and objectives were subject to consultation as part of Issues and Options consultation exercise in June 2015 and also as part of the Preferred Options consultation in January 2017. During this time, there has been an extensive public examination and adoption of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) as well as the adoption of the Local Enterprise Partnership (LEP) Strategic Economic Plan (SEP), both of which have helped to shape this plan.
- 1.2. Future national government policies, in particular the development of the UK's ambitious Industrial Strategy will focus heavily on place, people and industries. The combination of the Cheltenham Plan and the Joint Core Strategy will help ensure that Cheltenham plays a pivotal role in facilitating an increase in productivity and providing significant economic growth across the Borough and the County of Gloucestershire.
- 1.3. Local communities, businesses, developers and visitors have all helped to shape what the Cheltenham Plan should deliver (the Vision) and how it should be achieved (the Objectives). Wide ranging consultation has given the Plan a firm direction in which to move forward and this is reflected in the document that follows.
- 1.4. It should be noted that the Cheltenham Plan vision and objectives should also be viewed within the context of the JCS's visions and objectives as well as the Council's own corporate vision.
- 1.5. The Cheltenham Plan is also being developed alongside an emerging Place Strategy for the Borough. The objective of the Place Strategy is to draw together the strands which impact on defining Cheltenham as a place and to act as a leadership and influencing tool to support economic growth and the wider well-being of our communities. The chosen way forward will therefore need to ensure that the Plan remains consistent and continues to support the wider aims and objectives of the Council.
- 2.5 The preparation of the Cheltenham Plan has been led by a cross-party member working group, steering its direction since the scoping consultation in 2013.

- 1.6. **Cheltenham is a place where people live in strong, safe, healthy, well-served and well-connected communities which are successful and sustainable places in which to live and work and which contain the necessary infrastructure to support social and cultural life together with space for people and places to evolve in future.**

THEME A OBJECTIVES

- a) Recognise the local distinctiveness of Cheltenham's various neighbourhoods and deliver regeneration where appropriate;
- b) Ensure provision of sufficient housing land and other opportunities for residential development that meets the needs of the current and future population of the Borough;
- c) Understand what people need from the places where they live and work to help create socially sustainable communities using locally specific models;
- d) Ensure that new communities are integrated with neighbouring communities to promote cohesion, address issues of deprivation and reduce social isolation;
- e) Enable investment in schools, healthcare and other community facilities and meeting places in order to support new and existing communities;
- f) Increase opportunities for sport and active leisure, particularly in areas of under-provision;
- g) Design places, with a focus on connectivity, that are accessible to all and where barriers to walking and cycling are removed so that active travel and public transport are the default choices;
- h) Support a network of neighbourhood centres that provide an appropriate range of local amenities to support sustainable communities;
- i) Ensure that new development protects public safety and amenity and creates environments that contribute to reducing crime and fear of crime;
- j) Improve health outcomes by promoting and prioritising active travel.

VISION THEME B

- 1.7. **Cheltenham is a place with a prosperous and enterprising economy where education, skills and employment opportunities are increasing and diversifying,**

where businesses choose to invest and deliver increased value of economic output, and where the benefits are felt by all.

THEME B OBJECTIVES

- a) Ensure provision of sufficient sites and range of employment land and other opportunities for economic development to attract new businesses and to enable existing businesses to grow and develop within Cheltenham, creating an environment that supports economic growth, provision of local jobs, and flexibility within the local economy;
- b) Promote the development of adaptable and flexible employment space within Cheltenham so that sites and buildings can be re-used with minimal environmental impact;
- c) Supports opportunities for business start-ups and small / medium-sized enterprises (SMEs);
- d) Assist in developing and maintaining an attractive retail offer in the town centre and other designated centres;
- e) Helps secure a balanced economy overall which includes a focus on retail and leisure employment in the central core;
- f) Deliver a range of sustainable transport choices through appropriate infrastructure improvements including better cross-town and local links, prioritised junctions, and improved public transport.
- g) Encourage knowledge-intensive services businesses in high value sectors;
- h) Support development of Cheltenham's educational facilities to ensure that the young people have access to a wide range of opportunities.

VISION THEME C

- 1.8. **Cheltenham is a place where the quality and sustainability of our cultural assets and natural and built environment are valued and recognised locally, nationally and internationally and where tourists choose to visit and return.**

THEME C OBJECTIVES

- a) Conserve and enhance Cheltenham's architectural, townscape and landscape heritage, particularly within the town's conservation areas;

- b) Conserve, manage and enhance Cheltenham's natural environment and biodiversity;
- c) Support development of Cheltenham's sporting, cultural, arts and tourism infrastructure (including public art) to ensure that the Borough maintains its reputation as a cultural destination and continues to be an attractive place to visit;
- d) Address the challenge of climate change, ensuring that development meets high design and sustainability standards and is built to be adaptable over the long term;
- e) Improve pedestrian and cycle connectivity and permeability throughout the town by creating a network of convenient routes which include multifunctional green spaces that link with the wider countryside, attractive and safe streets and spaces, and measures which reduce the visual and environmental impact of vehicular traffic;
- f) Support provision, maintenance and continued investment in a high quality public and private realm including public hard-landscaped areas, formal and informal green spaces, and private gardens that contribute to local amenity and wildlife biodiversity;
- g) Manage and reduce the risk of flooding within the Borough.

During the course of the plan period, the Cheltenham Plan will seek to ensure that all the above objectives are realised through the implementation of the following policies proposals.

1. EMPLOYMENT

CONTEXT

- 3.1. The Cheltenham Plan is putting forward a strategy which is intended to better manage the use of employment land as part of a coordinated approach with the JCS to meet ambitious aspirations for growth, open up opportunities for large companies, SMEs and business start-ups, and create a vibrant, competitive economy. Our ambition is to create an environment that supports economic growth and flexibility within the local economy, whilst also recognising the strategic role Cheltenham plays in the wider economy of Gloucestershire and regionally.
- 3.2. In land use terms, three primary strands have emerged from the key issues identified at the Cheltenham Plan Issues & Options Stage in 2015 which took account of consultation on the Local Plan Scoping Report in 2013, the findings of the Economic Strategy in 2015, and more recent engagement with local business leaders. These are:
- the need to appropriately manage the use of land and premises,
 - the need to maximise the opportunities presented by the Cyber Security industry, and
 - support for business start-ups and SMEs
- 3.3. These are considered further below with further evidence and supporting information included in the Employment Background Paper published separately.

POLICY EM1: SAFEGUARDING KEY EXISTING EMPLOYMENT LAND AND BUILDINGS

The following sites which are shown on the Cheltenham Plan Proposals Map have been identified as containing key employment land to be safeguarded for employment purposes:

1. Runnings Road (Kingsditch Trading Estate, Block 1 & Blocks 5-7)
2. Gloucester Road, Benhall (GCHQ)
3. Jessop Avenue / St. James Square
4. New Barn Lane (UCAS)
5. Tewkesbury Road (Block 1)
6. Cheltenham Trade Park
7. Hatherley Lane (The Reddings)

Development proposals for a change of use of land and buildings currently or last in employment use (note 1) on key existing employment sites will not be permitted except where:

- The proposed use is Sui Generis but exhibits characteristics of traditional B1, B2 or B8 employment uses (note 2); or
- The proposed use provides new high-skilled jobs such as those associated with knowledge-based service and technology industries.

New employment allocations made under Policy EM3 of the Cheltenham Local Plan and new strategic employment allocations made as part of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy, namely, land at West Cheltenham and land at North West Cheltenham will also be safeguarded by Policy EM1 on completion of development.

This policy contributes towards achieving the Cheltenham Plan Vision: Theme B - objectives a, b and e.

Note 1: Employment use means B class employment uses together with those Sui Generis uses that exhibit characteristics of traditional B1, B2, B8 uses such as car sales, a builder's yard, or a vehicle or tool hire business. The list is not exhaustive.

Note 2: Sui generis uses which may require an employment location are the same as those listed at note 1, although the list is not exhaustive.

KEY EMPLOYMENT LAND

- 3.4. The Council will seek to ensure that the best, most versatile employment land, defined as Key Employment Land on the Local Plan Proposals Map, will remain available for B1, B2 and B8 employment uses and not eroded for other uses.

- 3.5. These sites are recognised as having the potential to make a significant contribution to the aim of delivering new jobs and increasing GVA / productivity in Cheltenham over the Plan Period and would assist in meeting the aspirations for growth set out in the Strategic Economic Plan. The list of sites is included in Policy EM1.
- 3.6. A site's designation as a key site is based on one or more of a variety of factors and, to this end, identified sites can exhibit a range of differing characteristics. The following have considered first and foremost:
- Whether the character of the site is predominantly traditional employment-based (use classes B1/B2/B8);
 - The location of the site in terms of its strategic and local accessibility;
 - Access to the site by public transport, walking and cycling and the site's ability to improve local transport / connectivity;
 - The proximity of community facilities to help support the workforce;
 - The size of the site and its capacity for expansion in future;
 - Whether there is currently a limited supply of such premises / accommodation across the Borough;
 - Whether there is market demand / requirements for such locations;
 - The lack of constraints (physical or otherwise) to unhindered continued use, or future expansion.
- 3.7. By identifying key sites in this way, it is intended that the Cheltenham Plan will provide a more refined and focussed approach to facilitating and enabling economic growth than before, and that by protecting such sites, the Plan will help ensure a more balanced economic strategy which simultaneously helps to capitalise on key areas such as the recent rapid growth in demand for serviced office accommodation.
- 3.8. To not follow such an approach would risk causing further loss of high quality business and enterprise parks and premium grade offices and would delay the Plan's ability to meet the needs of existing business and attract new businesses to the area. The resulting lack of employment space in sustainable locations could result in increased car use as businesses are forced to locate to offices outside the town, thus negatively impacting the local economy.

SPATIAL CHARACTERISTICS

- 3.9. It will be noted that the distribution pattern of key employment sites possesses a strong spatial dimension whereby there is a greater concentration of sites towards the west of Cheltenham, particularly along the A4019 and the A40. The area benefits from very good strategic access, being close to the M5 motorway and with good connections to Junctions 10 and 11. Whilst Junction 10 is still constrained through being two-way rather than four-way, sites in the west of Cheltenham would stand to benefit further should investment be forthcoming to facilitate an all movements junction in future. The Council is committed to keep up the pressure of lobbying to influence this and is working closely with key partners on achieving a satisfactory outcome, namely to get Junction 10 included on the post-2020 Roads Investment Strategy. The economic strategy as set out in this plan will support that activity. Upgrading the junction will provide significant economic growth opportunities by unlocking the potential of additional land.
- 3.10. The strategic position of these sites, their good accessibility, and their attractiveness to the market have all been influential in determining their identification as containing key employment land. The resulting spatial dimension dovetails with the vision and associated land-use strategy of the JCS whereby there is a clear preference for capitalising on development opportunities in the west through strategic land allocations in proximity to appropriate infrastructure and employers offering high value jobs and services and the potential for significant inward investment.
- 3.11. On Key Employment Land, a change of use will be permitted for sui generis uses exhibiting characteristics of traditional employment uses (B1, B2, B8) or for uses that provide new, highly skilled jobs or high value added activities such as research and education.
- 3.12. The above policy reflects the approach to safeguarding key existing employment land in Cheltenham. In addition to the existing employment sites identified, it is intended that key employment land includes a small number of new employment allocations being made under Policy EM3 of the Cheltenham Plan together with those strategic employment allocations at West Cheltenham and North West Cheltenham being made as part of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy when any relevant development at either of those locations is completed.

POLICY EM2: SAFEGUARDING NON-DESIGNATED EXISTING EMPLOYMENT LAND AND BUILDINGS

Development proposals for a change of use of land and buildings currently or last in employment use (note 1) will only be permitted where:

- a) buildings were constructed and first occupied for residential use; or
- b) the loss of the site to other uses does not have a detrimental impact on the continuing operation of existing businesses in the vicinity (note 2) and;
 - i. The proposed use is job generating (note 3) with any loss of existing provision being offset by a net gain in the quality (note 4) and / or the number of jobs provided on the site; or
 - ii. Development of the site will ensure the relocation of an existing firm to a more suitable location within the Borough (note 5); or
 - iii. There has been a sustained and long-term absence of economic activity on the land with no reasonable prospect of the land being used for employment (note 6);

or

- c) The applicant for planning permission can demonstrate that employment use creates unacceptable environmental or traffic problems which cannot be satisfactorily resolved.

Proposals for the redevelopment of non-designated employment sites will need to consider matters of viability in demonstrating adherence to the following sequential approach in order of preference:

- 1) Traditional B class employment-based redevelopment
- 2) Job generating redevelopment (note 3)
- 3) Mixed use redevelopment including traditional B class employment uses
- 4) Mixed use redevelopment including job generating uses (note 3)
- 5) Non-employment redevelopment

This policy contributes towards achieving the Cheltenham Plan Vision: Theme B - objectives a, b and e.

Note 1: Employment use means B class employment uses together with those Sui Generis uses that exhibit characteristics of traditional B1, B2, B8 uses such as car sales, a builder's yard, or a vehicle or tool hire business. The list is not exhaustive.

Note 2: 'In the vicinity' refers to adjacent business land and property; and /or business land and property within the same business site or estate; and /or business land and property within the wider neighbourhood. Each case will be considered on the basis of its particular locational characteristics with the overall aim being to maintain and enhance the Borough's employment offer.

Note 3: Job generating uses include retail, leisure facilities, education, health services, residential care and tourism. This list is not exhaustive and other uses may also be relevant. Proposals for retail uses will also need to comply with the sequential test and the Plan's retail policies. The assessment of whether or not a development is 'job generating' will not normally include jobs solely related to the construction phase of development.

Note 4: Quality jobs may include knowledge-based service and technology jobs such as cyber-security and ICT / digital industries; manufacturing and engineering; jobs in professional services such as insurance; and visitor economy jobs that help increase spend in Cheltenham. This list is not exhaustive and other uses may also be relevant.

Note 5: Evidence will be required to demonstrate why the existing site is unsuitable for the current use, why the alternative site is more suitable and why other uses are considered necessary in order to facilitate the relocation of the current user elsewhere within the Borough.

Note 6: Evidence will be required to demonstrate the lack of demand and consider the need for employment land currently or in future. At the heart of the criterion is the need to undertake an active advertising and marketing campaign that has been sustained over an appropriate period of time and has had regard to market characteristics. The amount of time that a campaign should be carried out is likely to vary depending on the scale of the redevelopment proposed and the amount of employment land that will potentially be lost. A period of not less than 1 year provides a reasonable benchmark.

EMPLOYMENT OUTSIDE OF KEY EXISTING EMPLOYMENT SITES

- 3.13. Land and purpose-built premises currently or last in employment use but not identified as Key Existing Employment Sites will also be safeguarded for a range of employment and job-generating uses such as offices, industrial, warehousing, leisure, education, research, health services, and tourism facilities. The list is not exhaustive and where an applicant can demonstrate another use is job generating this will be assessed on its own individual merits.
- 3.14. Where the use falls outside B1/B2/B8, the proposed job generating use should be the primary activity and proposals will need to demonstrate how the redevelopment contributes to net increase in jobs available or adds value to the local economy. Proposals for retail will need to comply with relevant retail policies.

- 3.15. A sequential approach is taken to the redevelopment of non-designated employment sites. Re-development of the site for non-employment development will only be allowed if it can be demonstrated that, firstly, employment or job generating based redevelopment, and secondly, mixed-use development generating some employment is not viable.
- 3.16. Exceptions to the policy may be permitted where continuation of the existing use is undesirable on traffic, amenity or environmental grounds, or there is a demonstrable lack of demand for employment use, currently or in future.
- 3.17. The above policy reflects the approach to safeguarding non-designated employment sites in Cheltenham.

POLICY EM3: NEW EMPLOYMENT ALLOCATIONS

The following sites which are shown on the Cheltenham Plan Proposals Map have been identified as locations for new employment development and are delineated on Plans E1 – E4 below. The red lines on Plans E1 – E4 mark the boundaries of the allocations and are separately and collectively part of this policy.

- a) Land south of Jessop Avenue, Town Centre (E1)
- b) Land south of Hatherley Lane, The Reddings (E2)
- c) Land north-west of Grovefield Way, The Reddings (E3)
- d) Land at Chelt Walk, Town Centre (E4)

Proposals for traditional B class employment uses or Sui Generis uses that exhibit the characteristics of traditional B class employment will be supported at these locations subject to being in accord with other relevant policies embodied within this Plan.

The contents of Policy EM3 reflect the evidence bases of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy and the Cheltenham Plan.

This policy contributes towards achieving the Cheltenham Plan Vision: Theme B - objectives a, b and e.

NEW EMPLOYMENT DEVELOPMENT

- 3.18. Though the emphasis of the Cheltenham Plan's employment strategy is to safeguard relevant sites and premises from inappropriate changes of use, the Plan is also making a small number of employment allocations within the Principal Urban Area. In this way, it is intended to provide further certainty as to where traditional B class employment activities will be concentrated whilst also providing a greater degree of choice and flexibility to the market.

- 3.19. Each of these employment allocations is considered to be a key employment site and upon completion of built development will be safeguarded from inappropriate changes of use by Policy EM1. It is also intended that land within Cheltenham Borough that is subject to the strategic employment allocations made through the emerging Gloucester, Cheltenham and Tewkesbury Joint Core Strategy, namely, land at West Cheltenham and land at North West Cheltenham will be safeguarded by Policy EM1 on completion of any relevant development.

JESSOP AVENUE (E1)

- 3.20. The site measures approximately 0.34 ha and comprises a flat parcel of brownfield land located to the south of Jessop Avenue on the western edge of Cheltenham Town Centre. Planning permission for the erection of a six-storey B1 office development was granted in October 2016 with the development currently under construction.

HATHERLEY LANE (E2)

- 3.21. The site is a flat parcel of land located to the south of Hatherley Lane, The Reddings on the western periphery of Cheltenham. It lies immediately south of the existing Pure Offices serviced business accommodation and is extremely well connected to the strategic highway network via the A40 and J11 of the M5. Measuring approximately 0.86 ha, the allocation offers an ideal opportunity for the expansion of contemporary business activities within a modern business park environment. The site which can be categorised as brownfield land has previously been used for employment purposes.

GROVEFIELD WAY (E3)

- 3.22. The site occupies a flat parcel of land to the north-west of Grovefield Way, The Reddings on the western periphery of Cheltenham. It lies immediately west of the Gloucestershire County Council Park & Ride facility at Arle Court and is extremely well connected to the strategic highway network along the A40 and to J11 of the M5. Measuring approximately 6.4ha, the allocation provides an opportunity for the establishment of a modern business environment at an important gateway location. The site can be categorised as greenfield and currently benefits from an extant planning consent for B1 employment uses. The Principal Urban Area is being amended to accommodate this allocation and part of the site already houses a flagship car dealership.
- 3.23. The development or change of use of land for new employment uses at locations not specifically covered by the Cheltenham Plan will be permitted where the

proposals accord with Policies SD1 and SD2 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy.

CHELT WALK (E4)

- 3.24. The site is located on flat land at the western edge of Cheltenham Town Centre and measures approximately 0.35 ha. It is currently used as a pay and display car park and therefore constitutes brownfield land. As the site and surrounding land is located within Flood Zones 2 and 3, appropriate design will need to mitigate any potential impacts, for example, by utilising lower floors for car parking. The site is considered to be a prime employment site capable of accommodating a modern office development although it is recognised that a small element of residential may potentially be possible as part of a successful scheme and may help knit the development with the varied surrounding land uses.



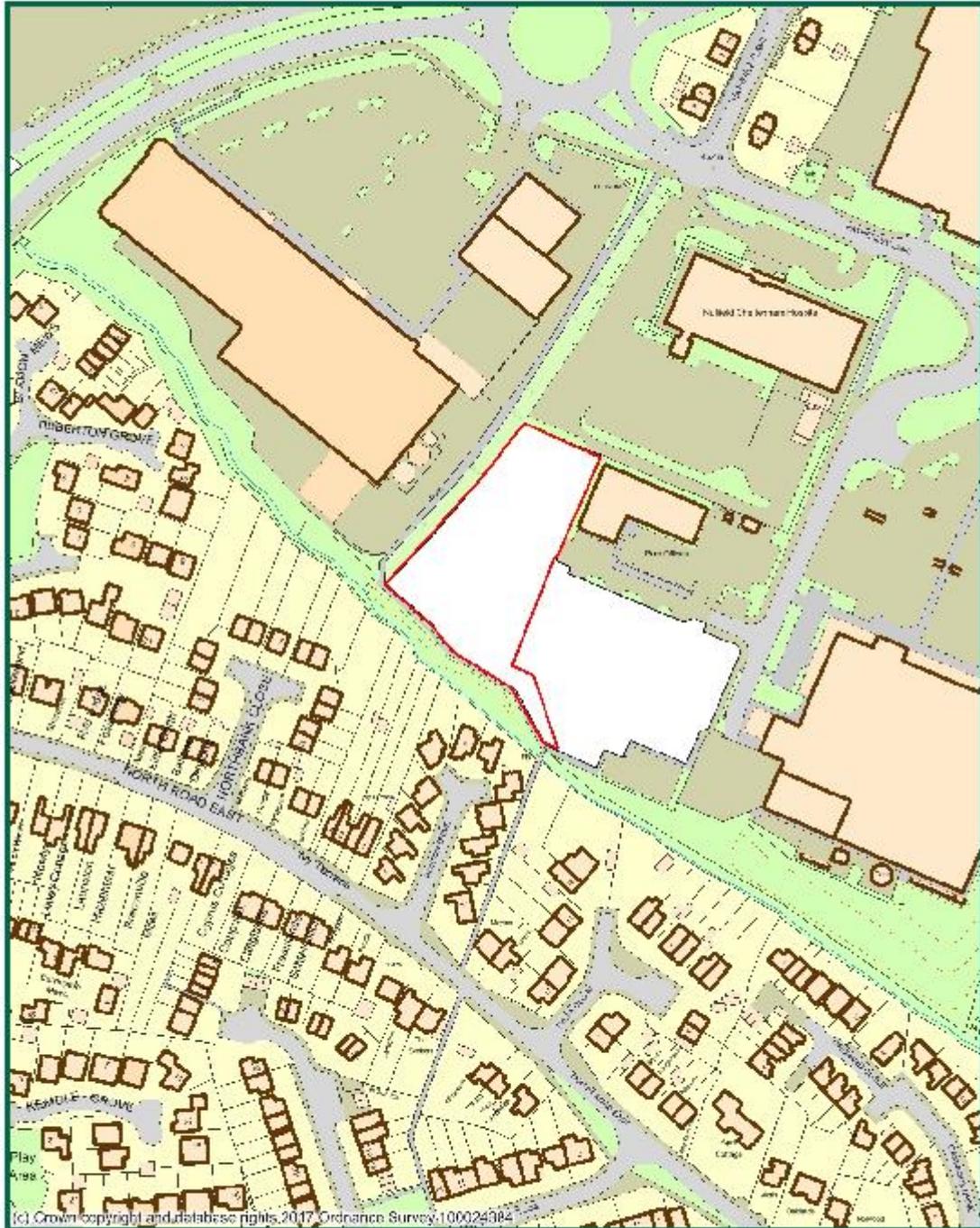
Policy EM3: Land south of Jessop Avenue, Town Centre (E1)

1:2000



20 November 2017

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Policy EM3: Land south of Hatherley Lane, The Reddings (E2)

1:2000



20 November 2017

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Policy EM3: Land north-west of Grovefield Way, The Reddings (E3)

1:5000



20 November 2017

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Policy EM3: Chelt Walk (E4)

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28 November 2017

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POLICY EM4: EMPLOYMENT SKILLS PLANS

For major indoor commercial development of 1,000 sq. m or more applicants for planning permission will be required to submit an Employment Skills Plan (ESP) which identifies opportunities for the employment and skills development of local people through the implementation of the development proposal.

This policy contributes towards achieving the Cheltenham Plan Vision: Theme B - objectives a, b, e and g.

EMPLOYMENT SKILLS PLANS

- 3.25. In the long term, it is not socially or environmentally sustainable for people to travel long distances to reach work. In Cheltenham, the Council considers there is a need to better match the jobs available in the local area with the skills present in the local workforce. Nurturing our environment to attract and retain talent is critical, especially in the light of Brexit and the UK losing ranks on the list of the world's major economies.
- 3.26. In order for local people to secure jobs in the local labour market, it is necessary for them to attain appropriate education and skills to meet the needs of local employers. In turn, local employers need to provide opportunities to suitably qualified people from the local area whilst also attracting a highly skilled workforce.
- 3.27. The above policy aims to facilitate a more balanced relationship between labour supply and demand in Cheltenham and to align these two key elements of sustainable economic policy more effectively. It is designed to complement key themes of the *Strategic Economic Plan for Gloucestershire (2014)* to support skills delivery according to local priorities and to ensure there is a direct correlation between skills supply and demand.
- 3.28. The Council will expect an Employment Skills Plan (ESP) to be submitted as part of all relevant planning proposals. The ESP should address priorities identified and agreed at an early stage through liaison with the Council itself and local employment and skills agencies. It is anticipated the ESP will contain targets which are in conformity with industry standard benchmarks for the outcomes expected from the particular size and type of construction proposed. Targets will likely relate to the jobs created at the construction phase of development as well as the jobs created thereafter.
- 3.29. As the Government defines major commercial development as being 1,000 sq. m of floorspace, the threshold set out in Policy EM4 reflects this definition.

POLICY EM5: PROMOTING THE CYBER-SECURITY SECTOR

In order to further develop and enhance Cheltenham's position as a premier location for cyber security, innovation and business in the UK, development proposals for businesses that support cyber security activities will be favoured subject to the proposal being appropriate to the location concerned and being in accord with other relevant policies embodied within this Plan.

This policy contributes towards achieving the Cheltenham Plan Vision: Theme B - objectives a, b, e and g.

MAXIMISING OPPORTUNITIES PRESENTED BY THE CYBER SECURITY INDUSTRY

- 3.30. Public and private sector cyber security activities are significant for Cheltenham and present unique opportunities in terms of high value jobs and activities.
- 3.31. The area is recognised as a growing centre in the UK for research, development and commercialisation of cyber security products and services. The Council, supported by Government departments including the Department for Digital, Culture, Media & Sport (DCMS); the Department for Business, Energy & Industrial Strategy (BEIS); and the Department of International Trade (DIT), recognises there are real opportunities from expanding the cyber security sector with a focus on a new cyber business park, but also in any spin-off or associated ICT, digital and technology activities that may have a complementary use for the skills, specialisms and market contacts of the sector.
- 3.32. The planning system has a role to play in helping to nurture and support this potential and the Cheltenham Plan includes a policy that is designed to look favourably on businesses wishing to locate or develop within the Borough. The policy represents a form of intervention in the market to encourage those uses that have an essential need to locate close to establishments such as GCHQ and represents a step forward from previous employment policy in that it should help focus Cheltenham's economy towards a specialist sector and therefore help achieve aspirations for GVA growth and delivery of the Gloucestershire Strategic Economic Plan.
- 3.33. The policy is broad in its approach and does not set out to specifically allocate individual sites and premises; to do so may inadvertently prejudice other employment uses and may prevent existing, ageing, and sub-standard premises from being redeveloped. Rather, the approach is to support a growing high-technology global industry to locate to the town and to help brand Cheltenham as a premier location for cyber-security innovation and business in the UK and to help

provide a physical identity. Cheltenham is emerging as a modern, forward thinking town with a good quality of life and exciting offers for a mobile and highly skilled workforce reflecting the demands of an innovative sector such as cyber-security.

- 3.34. The success of any cyber-security initiative will require coordinated action between the Council, property developers and other sectors of the business community. However, through the above policy, the Cheltenham Plan aims to move the initiative forward being one of the primary facilitators of change.

POLICY EM6: BUSINESS START-UPS AND SMALL / MEDIUM-SIZED ENTERPRISES

Development proposals that facilitate new business start-ups and the expansion of existing small and medium-sized enterprises will be supported subject to the proposal being appropriate to the location concerned and being in accord with other relevant policies embodied within the Cheltenham Plan.

This policy contributes towards achieving the Cheltenham Plan Vision: Theme B - objectives a, b and e.

BUSINESS START-UPS AND SMALL / MEDIUM-SIZED ENTERPRISES

- 3.35. Evidence compiled as part of the background work to the Cheltenham Plan largely reflects the results of previous economic / site studies undertaken in the Borough over the last 10 years. Together, they have presented a consistent view on the existing portfolio of sites and premises re-iterating market strengths but also highlighting key factors that need to be addressed. The main issues identified by the reports were outlined at Preferred Options stage and these include acknowledgment of the following:

- there is limited business start-up space available particularly serviced and supported space for incubator or innovation development;
- there is a lack of intermediate-type accommodation to help small business grow;
- there are a number of important businesses on single occupier sites where there are constraints to the potential expansion of those businesses at that location.

- 3.36. A recent analysis of ONS business failure statistics from across the UK (Savoy *Steward 2017*) suggested that Cheltenham has a high proportion of business failures after one year (87%). Whilst the reasons for such failures are not made entirely clear and the statistics include mergers and takeovers, the Council and its partners are working to address the matter through increased business support

and the provision of a wider range of more accessible advice, guidance and networks.

- 3.37. In land use policy terms, the Council is introducing new planning policy through the Cheltenham Plan to provide a suitably robust framework to help steer the way in which existing employment land and premises are managed. Policies EM1 and EM2 have been formulated to ensure that changes away from job generating uses are only allowed in certain circumstances. Policy EM3 makes several new employment allocations, the first in the Borough for many years.
- 3.38. In addition to the above, Policy EM6 is being introduced to provide 'in principle' support for new business start-ups and the graduation of existing small businesses to intermediate and medium-sized enterprises. Some existing employment sites, for example, Tewkesbury Road (Neptune Business Centre and Space Business Centre) already contain a flexible range of unit sizes including start-up and small business accommodation along with bespoke packages to support other occupiers' requirements all housed in serviced accommodation.
- 3.39. Subject to compliance with other relevant policies in the Cheltenham Plan, the Council will support the provision of further, similar accommodation as a means of helping to address the issue of business failures.

TOURISM

- 3.40. Tourism has been an integral part of Cheltenham's economy since its development as a Regency Spa in the second half of the 18th Century. Indeed, tourism assists in the retention and restoration of the Regency heritage of the town today and provides important employment opportunities for the local workforce.
- 3.41. Cheltenham is currently undertaking a review of its tourism strategy and the Council will continue to support an enhanced role for tourism in driving the Borough's economy in future. Given the location of Cheltenham on the edge of the Cotswolds, it is likely that future approaches will aim to capitalise on the town's role as a gateway to the Cotswolds as well as being a leisure and tourist destination in its own right.
- 3.42. To facilitate increased visitor numbers and greater expenditure in the tourism sector, collective marketing with neighbouring Cotswold authorities is being considered. Any land use implications arising from Cheltenham's emerging tourism strategy will be supported subject to conformity with the wider policy framework provided by the Cheltenham Plan and JCS, in particular, the need for sustainable development.

4. RETAIL AND CITY / TOWN CENTRES

CONTEXT

- 4.1. Policy SD2 of the JCS states that retail policies within the Borough of Cheltenham are set out in the saved policies of the existing Local Plan i.e. the Cheltenham Borough Local Plan (adopted 2006). Furthermore, that these policies will be reviewed and taken forward as part of the immediate review of JCS retail policy.
- 4.2. This being the case, the new Cheltenham Plan does not include any policies on retail. Retail policies will be introduced at the earliest opportunity upon completion of the JCS retail review and will be formulated to work in tandem with revised JCS retail policy in future.
- 4.3. The above approach reflects the requirements of the Planning Inspector who conducted the JCS Examination.

5. DESIGN REQUIREMENTS

CONTEXT

- 5.1. The Council seeks to ensure that all new buildings and spaces make a positive contribution to Cheltenham and to the lives of its residents and visitors. It therefore places great emphasis on the importance of good design in all development. Good design with well-considered buildings and spaces is key to making places that are successful both socially and economically; good to live in, and attractive to visit. It helps to achieve value for money in new developments, and makes effective use of scarce resources, be they land or materials.
- 5.2. Good design also helps to create lively communities which are human in scale with distinctive, local character; it helps to make streets and public spaces that are safe, accessible, and pleasant to use; it can even create places that inspire.
- 5.3. Careful urban design can contribute to a reduction in crime and anti-social behaviour and is an important tool in promoting more healthy patterns of living. Overall, it can produce attractive, high quality, sustainable places in which people will want to live, work and spend leisure time.

POLICY D1: DESIGN

Development will only be permitted where it:

- a) adequately reflects principles of urban and architectural design; and
- b) complements and respects neighbouring development and the character of the locality and / or landscape.

Extensions or alterations of existing buildings will be required to avoid:

- a) causing harm to the architectural integrity of the building or group of buildings; and
- b) unacceptable erosion of open space around the existing building.

This policy contributes towards achieving the Cheltenham Plan Vision: Theme A – objectives a, d, g and i; Theme C – objectives a, d and f.

DESIGN

- 5.4. The key principles of urban design and architectural design are set out in Tables SD4b and SD4c of the JCS. Together, these define the overall layout of a place (in

terms of its routes and building blocks), its scale (in terms of building height and massing), its appearance (as expressed in details and use of materials), and its landscape (including all the public realm, built and green spaces).

- 5.5. The Council will take account of the key urban and architectural design principles in determining planning applications and will often require the preparation of a masterplan or design brief to accompany a proposal, the contents of which should accord with the framework set out at Table SD4d of the JCS. Recommendations from the design review panel will be taken into account and innovative design which helps to raise design standards in the area will be encouraged.

SHOP FRONT DESIGN

- 5.6. The high quality, comprehensive shopping facilities set in pleasant surroundings which Cheltenham offers are an important part of the town's attraction to both residents and tourists. Shopfronts form an integral part of this scene, and to maintain an attractive environment it is important that these should be well designed. The Council has adopted a Shopfront design guide to encourage greater care to be taken in shopfront design, to allow scope for imagination and flair, and to ensure that a high standard of design in shopfronts is achieved and maintained throughout the town and the Borough as a whole.

PUBLIC ART

- 5.7. The Council has recently prepared a Public Art Strategy which sets out the diverse practice that forms contemporary public art, or art in public, and could be developed to enhance the town for the benefit of its residents, for visitors and its cultural future. It is designed to be a useful tool for advocacy so there are sections on the cultural, social, environmental and economic benefits of public art and the way public art can complement local objectives and policy in Cheltenham. The strategy recommends early engagement of planners and developers as a key driver for successful projects which engage communities in creating their own agendas and spaces and integrate well.

EXTENSIONS

- 5.8. Extensions to existing buildings need to be carefully designed to respect the character and scale of the existing building or group of buildings. In accordance with the aforementioned key principles, they should be to a high standard of design, and would normally be expected to use materials which match the original building, with similar forms of roofs, doors, windows and other elements. In cases where it is important that the extension remains subordinate to the original

building, it may be appropriate to distinguish the extension by a substantial set back in the building line. Occasionally, a different approach may be appropriate to separate and differentiate an extension from the main building. The most important consideration is that an extension should not detract from the original. The Council has adopted a Residential Alterations and Extensions SPD to help householders, builders and agents when considering schemes for altering or extending individual houses.

- 5.9. Extensions will not be permitted where they result in an unacceptable loss of garden or other open space (see also Policy D3 below, and the Supplementary Planning Document: *Development on Garden Land and Infill Sites* (2009)).

POLICY D2: ADVERTISEMENTS, SIGNS AND HOARDINGS

The display of an advertisement or sign will be supported providing its location or size would not harm:

- the appearance of the building or the visual amenity or distinctive character of the immediate neighbourhood where it is to be displayed; and
- public safety.

This policy contributes towards achieving the Cheltenham Plan Vision: Theme A - objectives a and i; Theme C - objectives a and f.

ADVERTISEMENTS, SIGNS AND HOARDINGS

- 5.10. The display of advertisements is generally subject to the provisions of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. These Regulations do not apply to certain classes of advertisements, including traffic signs, which give directions to motorists or pedestrians. The Regulations grant deemed consent for other classes of advertisement, which are therefore not subject to control by the Council. Deemed consent can be restricted by the Direction of the Secretary of State, or withdrawn by Local Planning Authorities by service of a Discontinuance Notice. All other advertisements are subject to control and require express consent.
- 5.11. Appropriate advertisements and signs can give vitality and interest to a street and create a positive impact on the commerciality of businesses. Inappropriate advertisements and signs can, however, detract from important architectural or townscape character, and a proliferation can cause clutter, confusion and loss of visual amenity. For this reason, the Council gives careful consideration to the design and location of new proposals; and, in some cases, to existing

advertisements and signs which disfigure a building or street and may require action to secure their removal.

- 5.12. Additional advertisement controls exist in conservation areas and reference to Policy HE5: Advertisements, Signs and Hoardings in Conservation Areas will be necessary when considering relevant proposals in these areas.

AREAS OF SPECIAL CONTROL FOR ADVERTISEMENTS

- 5.13. Local authorities have powers to define Areas of Special Control which are considered to merit protection on amenity grounds. Such areas can be rural or urban in nature and express consent is required for a greater range of advertisements than would normally be the case. Areas of Special Control were first designated in the former Cheltenham Municipal Borough in 1950, and were extended to cover the AONB in 1967.
- 5.14. Under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007, local authorities are obliged to periodically consider whether any part or additional part of their area should be designated as an Area of Special Control, and, when an area has been designated, to consider whether it should be revoked or modified.
- 5.15. The Council has periodically reviewed the Areas of Special Control in Cheltenham since their designation but no changes have been made. The Council will continue to keep the designations under review during the course of the plan period and if changes are considered appropriate, for example, to include the Green Belt and / or conservation areas, an Order to this effect will be submitted to the Secretary of State for confirmation. The effect of a control order is to limit some of the categories of advertisement that benefit from deemed consent.
- 5.16. It should be noted that the designations, whilst complementary to development plan policy, are entirely separate and are made under different regulations. They are therefore not part of the planning process and are not appropriate to be advanced as a proposal of the development plan.

POLICY D3: PRIVATE GREEN SPACE

The development of private green areas, private open spaces and private gardens which make a significant contribution to the townscape and environmental quality of Cheltenham will not be permitted.

Proposals for development within extensive grounds of large properties will need to take account of the scale and location of existing buildings within or adjacent to the site, the main features of the site itself, and where appropriate, will be required to:

- retain mature trees;
- retain and enhance existing landscaping;
- provide new landscaping;
- avoid disturbance of significant habitats.

This policy contributes towards achieving the Cheltenham Plan Vision: Theme C - objective f.

PRIVATE GREEN SPACE

- 5.17. Para. 53 of the NPPF states that “Local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”
- 5.18. A considerable amount of green space in Cheltenham is owned privately. It can take the form of playing fields and the gardens / grounds of commercial, educational and domestic properties. The environmental value of such green space can equal that of publicly owned green space but it is often overlooked and considered by owners to be a valuable resource that can be better utilised for development, for example, as a means of expanding existing premises or providing better car parking.
- 5.19. The above policy is designed to ensure that valuable private green spaces are maintained and that development proposals which could be to the detriment of the townscape and environmental value of Cheltenham’s green space are not allowed to proceed. In determining whether a green space has significant townscape and environmental value, the Council will have regard, amongst other factors, to the following:
- the spacious character of the town
 - the quality of the local townscape

- the established character of the locality
 - the setting of an important building or group of buildings
 - important landmarks, views and vistas within and out of Cheltenham.
- 5.20. There are many large properties in Cheltenham which were originally private homes. Some are still in this use, but more have been converted to flats, nursing homes, private schools, business premises and other uses. These properties are often set in extensive grounds and the maturity of these grounds creates particularly attractive and valuable green spaces. The least disturbed areas will also often contain well established plant and animal habitats.
- 5.21. The above policy will require all relevant proposals to take full account of the development site and its surroundings and, where necessary, retain and enhance existing landscaping, and avoid disturbance of any significant habitats present.
- 5.22. The Development on Garden Land and Infill Sites in Cheltenham Supplementary Planning Document was adopted by the Council in 2009 and remains an important material consideration. The SPD framework outlines factors likely to influence the consideration of applications and indicates what is required from garden land and urban infill proposals.
- 5.23. Those areas being advanced as Local Green Space in the Cheltenham Plan are not intended to be covered by Policy D3 but are instead considered in the chapter on Green Infrastructure through policy GI1.
- 5.24. The recreational value of individual green spaces as distinct from their environmental value is considered separately in the chapter on Social and Community Infrastructure.

6. GREEN BELT

CONTEXT

- 6.1. The concept of a Green Belt as means of checking the unrestricted sprawl of built-up areas and protecting the countryside dates from 1955. In Gloucestershire, a Green Belt between the two principal towns of Gloucester and Cheltenham was first put forward in 1957 and later formally approved as part of the County Development Plan Quinquennial Review in 1968. An extension to the Green Belt to the north of Cheltenham, to separate it from Bishop's Cleeve was proposed in the Gloucestershire Structure Plan in 1981.
- 6.2. Whilst the strategic nature of the Green Belt means that related issues primarily fall to be considered against national planning policy and the higher order JCS, the Cheltenham Plan has an important role to play in implementing green belt policy and ensuring the Green Belt continues to serve its key functions which have actually changed little over the last 60 years.
- 6.3. Protecting the Green Belt from harmful development is crucial as part of a coordinated and balanced approach to securing economic prosperity and good standards of health and well-being for the Borough in future. Within Green Belt boundaries, development will be restricted to those limited types of development which are deemed appropriate by the NPPF and the JCS unless very special circumstances can be demonstrated. The following policies reflect the need for tight control.

POLICY GB1: RESIDENTIAL INFILLING IN THE GREEN BELT

Development within the Green Belt will be restricted to those types of development which are deemed appropriate by the NPPF and JCS.

Limited residential infilling (note 1) of built frontages along The Reddings, Shaw Green Lane and Bowbridge Lane will be permitted only where there is no resulting harm to the openness of the Green Belt (note 2).

This policy contributes towards achieving Cheltenham Plan Vision: Theme A – objective b; Theme C – objective b.

Note 1: In this context, "infilling" means the construction of a new building or buildings between two existing buildings.

Note 2: This precludes the demolition and replacement of existing housing. Such proposals would fall to be assessed against Policy GB2 (rebuilding or replacement of dwellings in the Green Belt).

RESIDENTIAL INFILLING IN THE GREEN BELT

- 6.4. Residential development already stretches into the Green Belt along certain roads in the Borough. The Reddings, Shaw Green Lane and Bowbridge Lane are particularly affected. Infilling at these locations will be permitted subject to careful assessment and providing it does not compromise from the character or functionality of the Green Belt.
- 6.5. The above policy provides a locally distinctive response to the appropriate exceptions set out in national policy. It also provides consistency with JCS Policy SD5 and reflects the stance of the previous adopted Cheltenham Borough Local Plan in facilitating sustainable development patterns across the Borough.

POLICY GB2: REBUILDING OR REPLACEMENT OF DWELLINGS IN THE GREEN BELT

The rebuilding or replacement of existing dwellings in the Green Belt will only be permitted where:

- a) the new building will continue to be used as a dwelling;
- b) the new building is not materially larger than the one it replaces;
- c) where more than one existing dwelling is to be replaced, the number of replacement dwellings is no greater than the number to be demolished;
- d) there is no harm to the openness and visual amenity of the Green Belt.

This policy contributes towards achieving Cheltenham Plan Vision: Theme A – objective b; Theme C – objective b.

REBUILDING OR REPLACEMENT OF DWELLINGS IN THE GREEN BELT

- 6.6. Buildings in the countryside are not only functional in the activity for which they have been designed, many make a significant contribution to the character of the landscape. Without adequate controls, the character of the Green Belt could change to its detriment in that traditional Green Belt dwellings with modest proportions would be replaced by large modern houses.
- 6.7. National Planning Policy makes clear that the construction of new buildings in the Green Belt is inappropriate, but that an exception is the replacement of a building

providing the new building is in the same use and not materially larger than the one it replaces.

- 6.8. Policy GB2 is designed to mirror this stance and to allow replacement dwellings in the Green Belt providing the relevant criteria can be satisfied. What constitutes harm to the Green Belt is a key determinant in this instance and each case is likely to vary according to exact location and individual circumstances. Overall, the openness and visual amenities of the Green Belt should not be further eroded by development and its functionality not undermined by encroachment.
- 6.9. To be considered an existing dwelling, the building should have been lived in as a permanent residential unit within the last 5 years and should not have been used for any other purpose in the meantime. The existing building should be recognisable as a dwelling; it should not be in a dilapidated, derelict and abandoned condition.
- 6.10. The replacement dwelling must be in scale, character and of similar size and materials to the existing where these are appropriate to the character and appearance of the area and the site in question. There may however be some cases where the Council considers that the existing dwelling is poorly designed and/or out of character with the rural setting. In these circumstances it would be appropriate to take the opportunity to improve the appearance of the site and locality through improved design, materials and orientation of the replacement dwelling in accord with the design policies embodied in this Plan.
- 6.11. The change of use of dwellings in the Green Belt to other uses will be subject to Policy EM6: Conversion of Rural Buildings.

7. LANDSCAPE

CONTEXT

- 7.1. Cheltenham owes much to its setting at the foot of the Cotswold escarpment. The town's eastern fringes include the high quality scenery of the escarpment, with landscape and woodlands that are designated as part of the Cotswolds Area of Outstanding Natural Beauty (AONB). Beyond the western edge of the town lies the flatter open countryside of the Severn Vale, where the designation of a Green Belt has helped to maintain a clear differentiation between Cheltenham and the neighbouring settlements of Gloucester (to the south) and Bishop's Cleeve (to the north).
- 7.2. Cheltenham's other major asset is its architectural heritage. The fine buildings and broad, tree-lined streets create graceful surroundings that appeal to residents, employers, shoppers and tourists alike. This impressive architectural legacy is often protected – the Cheltenham (Central) Conservation Area covers some 600 hectares, and the town continues to remain attractive to investors and developers. Consequently, the pressure for change, be it large scale new build or small incremental alteration, needs to be carefully managed to protect buildings, trees, and the essential character of what is often valued most.

POLICY L1: LANDSCAPE AND SETTING

Development will only be permitted where it would not harm the setting of Cheltenham including views into or out of areas of acknowledged importance.

This policy contributes towards achieving the Cheltenham Plan Vision: Theme A - objective a; Theme C – objectives a, b and f.

LANDSCAPE AND SETTING

- 7.3. For the purposes of this policy, the 'Setting' of Cheltenham is considered to embody those features which create the distinctive sense of place for the Borough, including the Cotswold escarpment, the distinguished architectural heritage and the myriad of green spaces.
- 7.4. Cheltenham's attractive setting is undoubtedly one of its prime assets and is recognised by the emerging Place Strategy for the Borough as a key factor in helping to achieve sustainable economic growth and securing social wellbeing. The

Council will therefore seek to continue the protection of the town's setting and encourage its future enhancement through sensitively designed / located development.

- 7.5. In doing so, the Council is mindful of the need to protect views into and out of areas of acknowledged importance such as conservation areas, ancient monuments, sites included on the Register of Historic Parks and Gardens, the area of outstanding natural beauty, the green belt, sites of special scientific interest, statutory and non-statutory nature reserves, regionally important geological and geo-morphological sites, listed buildings and buildings of local importance.
- 7.6. The above policy is designed to complement the policy stance of the JCS but to add further dimension through the recognition of local distinctiveness and the particular environmental qualities that make Cheltenham special.

POLICY L2: CONVERSION OF RURAL BUILDINGS

The conversion of rural buildings to uses other than agriculture will be permitted where:

- e) the building is structurally sound, suitable for and capable of conversion to the proposed use without substantial alteration, extension or rebuilding;
- f) the conversion and alternative use do not harm the character of the building and are appropriate to the character and setting concerned;
- g) the proposal would not cause conflict with existing or planned uses on or in close proximity to the site including severance or disruption to the agricultural holding that would prejudice its continued viable operation;
- h) the proposal accords with other relevant policies embodied within this Plan.

This policy contributes towards achieving the Cheltenham Plan Vision: Theme B - objectives a and b.

CONVERSION OF RURAL BUILDINGS

- 7.7. In considering development in the countryside, the JCS is clear in its intention to support appropriate types of development. This approach is mirrored by the Cheltenham Plan which recognises the potential of many rural buildings to accommodate new uses when the previous use has rendered them surplus to requirements or no longer suitable for their original intention.
- 7.8. As most rural buildings in Cheltenham Borough are within the Green Belt or AONB, their re-use and conversion requires special consideration. In determining planning applications, the Council will therefore take into account the effect of the conversion on the natural beauty and landscape character of the adjoining

countryside, the architectural and historic features of the building, any effect on the openness of the Green Belt (if relevant), and the need to give appropriate rural buildings a new lease of life.

- 7.9. The above policy applies to the conversion of all rural buildings whether of modern or traditional construction. Buildings should be physically capable of being converted in terms of their size, soundness and structural stability without recourse to extensive rebuilding, alteration or extension. Where an extension or significant alteration is proposed, it must be demonstrated that the building is capable of conversion on its own merit and such extension or alteration should not harm the character of the building, its setting and or the character and appearance of the landscape.
- 7.10. Proposals involving conversion to residential use will also need to be compliant with JCS Policy SD10 which seeks to prevent isolated rural development. They will also need to comply with general principles of promoting sustainable patterns of development including access to infrastructure and sustainable transport.

8. THE COTSWOLDS AONB

CONTEXT

- 8.1. The County Development Plan 1955 originally defined part of the Cotswolds as an Area of Great Landscape Value. This area has subsequently been largely overlaid by the designation in 1966, under the National Parks and Access to the Countryside Act 1949, of the Cotswolds Area of Outstanding Natural Beauty (AONB).
- 8.2. In December 1990 the Secretary of State for the Environment formally altered the AONB boundary to that shown on the Proposals Map. The AONB within the Borough is now approximately 10.5 square kilometres, almost one third of the Borough area.
- 8.3. Because of its attractive character, which derives from its built form as well as the landscape of the scarp edge, and its location on the urban fringe, the AONB in the Borough is particularly sensitive to development pressures. A restrictive approach is therefore necessary to conserve and enhance both of these elements. The Council considers it particularly important to protect the scarp as the dominant feature of Cheltenham's setting and is concerned at the cumulative effect of even small-scale development and of development in new locations within the AONB.
- 8.4. In assessing proposals for development, the Council will be guided by Paras 115 and 116 of the NPPF, Policy SD7 of the JCS and the advice of the Cotswold Conservation Board with reference to the Cotswold AONB Management Plan 2013-18. The latter publication contains the following Vision:
- In 20 years, the Cotswolds is a landscape:
 - which retains its remarkable visual unity and scenic diversity;
 - is richer in nature, and where the historic heritage is conserved;
 - is home to vibrant communities supported by a sustainable local economy;
 - provides a warm welcome and high-quality experience for everyone seeking inspiration, tranquillity and to be active outdoors; and
 - is adapting successfully to a changing climate and economic conditions.
- 8.5. To help maintain the special character of the AONB, the Council will limit any increase in the size of dwellings to that permitted by the Town and Country Planning (General Permitted Development) (England) Order 2015. Proposals for increasing the size of buildings in other uses, be they through rebuilding, replacement or extension will only be permitted where they conserve and, where

appropriate, enhance the special qualities of the AONB. Blanket floorspace targets and thresholds are not being introduced as the impact of development can vary from location to location and it is considered more appropriate that each case is treated on its own individual merits. Any permissions granted will be subject to specific design requirements in accord with the combined design policies of the JCS and Cheltenham Plan.

9. HISTORIC ENVIRONMENT

CONTEXT

- 9.1. One of Cheltenham's greatest assets is its architectural heritage, much of which is protected by conservation area designations. The town is very attractive to investors and developers which means there is considerable pressure for change. This needs to be carefully managed to protect buildings, trees, and the essential character of each street or place.
- 9.2. The NPPF (at para. 132) attaches 'great weight' to the conservation of heritage assets and their significance. Through the Historic Environment policies of the JCS and the Cheltenham Plan, the Council will protect, conserve and enhance the historic environment. Opportunities to better reveal the significance of heritage assets will be sought to ensure the historic environment plays an integral and positive role in place-making. Policy will support and seek to integrate the value of built heritage in enhancing the wider cultural and economic environment.
- 9.3. Further evidence and supporting information can be found in the Historic Environment Background Paper published separately.

PROTECTING THE WIDER HISTORIC ENVIRONMENT – A POSITIVE STRATEGY

- 9.4. The NPPF gives strong protection to the historic environment, recognising its cultural significance and the multiple ways it supports and contributes to the economy, society and daily life. In particular, it promotes an awareness and understanding of buildings and spaces and how they can:
 - connect people with their environment and heritage - creating a sense of place and identity, and helping people develop an attachment to their environment;
 - help people develop new skills and responsibilities through environmental and heritage volunteering;
 - help to get children learning outdoors about the places in which they live, bringing history alive and nurturing the next generations' appreciation of the need to safeguard important buildings and spaces;
 - encourage and empower communities to protect historic environments that are important to them.

- 9.5. The Regency legacy in Cheltenham is the setting for people's lives; it is where they live, work, shop and enjoy leisure and recreational activities. It is also an important draw for tourists.
- 9.6. Within this context, JCS Policy SD8 and the Cheltenham Plan set out a positive strategy for the conservation and enjoyment of the Borough's historic environment and heritage assets, including those at risk through neglect, decay or other threats. It acknowledges that heritage assets are an irreplaceable resource and also the need to conserve them in a manner appropriate to their significance.
- 9.7. The Gloucestershire Historic Environment Record (HER) is the primary evidence base for decision-making on and future management of the historic environment. It is a dynamic record, constantly being updated and enhanced. The HER is supplemented by a range of local studies and resources such as Conservation Area Character Appraisals and Conservation Area Management Plans which contain wide-ranging information on the entire historic environment, including locally important non-designated heritage assets. This comprehensive evidence base informs plan making and decision taking on planning proposals.
- 9.8. To ensure the conservation and enjoyment of the Borough's Historic Environment the Council will:
- continue to contribute to the maintenance and enhancement of the Gloucestershire Historic Environment Record;
 - review and regularly update Supplementary Planning Documents (SPDs), Conservation Area Appraisals and Management Plans;
 - where appropriate, designate additional Conservation Areas;
 - where appropriate, promote Article 4 Directions to protect Conservation Areas from harm as a result of Permitted Development;
 - periodically review the list of Locally Indexed Buildings
 - work with local communities to identify heritage assets at risk or vulnerable to becoming at risk and to support the development and implementation of local strategies to reverse and remove the risk by exploring opportunities to bring assets into viable use;
 - where necessary, employ appropriate enforcement measures;
 - produce and regularly review condition assessments for all heritage assets directly owned or managed by the Council;
 - seek opportunities for community engagement, education and outreach activities as part of the planning process;
 - prepare or support master-plans or design briefs for significant places or sites where major change is proposed in relation to the heritage assets affected;

- promote and support bids for external funding designed to conserve and enhance the historic environment;
- work with the Local Highways Authority and infrastructure providers to ensure that historic streets, townscapes and the public realm are designed to conserve and enhance the historic environment having particular regard to the Borough's Conservation Area Appraisals and related management proposals.

HISTORIC ENVIRONMENT DEVELOPMENT MANAGEMENT

- 9.9. The Borough has a large number of heritage assets, both designated and non-designated, including Listed Buildings, Scheduled Monuments, Conservation Areas, Registered Parks and Gardens and archaeological sites. All have been recorded in the Gloucestershire Historic Environment Record. There are also a number of other buildings, which have been identified as important such as those on the Index of Buildings of Local Importance, and 'positive' buildings within Conservation Areas.
- 9.10. Buildings and areas of architectural and historic interest make a valuable contribution to the character of the area and the historic environment as a whole is important for its potential to increase knowledge; its value for leisure, education and tourism; and as a key economic driver. The historic environment is an irreplaceable resource; therefore every effort should be made to ensure appropriate protection and enhancement.
- 9.11. An appreciation of local distinctiveness in the built environment is founded on the understanding of the characteristics and influences of the locality. Understanding this can help to shape our modern communities, giving them a sense of history and distinct local identity whilst supporting sustainable development.
- 9.12. Development will be expected to complement and enhance the varied built environment, creating interesting and attractive buildings and places. It is important that new developments are designed to a high standard to ensure an attractive and functional place for people to live, work and visit, to deliver prosperity, and help attract inward investment. The Council will use relevant Conservation Area Appraisal and Management Plans to inform and guide any decision. These documents identify local distinctiveness and act as a valuable resource against which development proposals will be assessed.
- 9.13. Where applications are likely to affect a heritage asset or its setting, applications should be supported by a description of the asset's historic, architectural and archaeological significance with an appropriate level of detail relating to the likely impact of the proposal on that interest. A site analysis identifying the qualities which contribute to local character, including development patterns, history, its landscape and views, and how these can contribute to the quality and

sustainability of the proposed development should also be provided. This may include:

- a built heritage assessment;
- an assessment of significance;
- a setting assessment; and
- a heritage impact assessment.

- 9.14. Design should be based on an understanding of the characteristics of the local area, in terms of character, built form, architecture, heritage and landscape. Well-designed attractive places improve the quality of life for all, minimising the opportunity for crime and the perception or fear of crime, and enhancing the environment; at the same time it contributes to the development of safer, stronger and sustainable communities that can adapt to the challenges of a changing climate.

POLICY HE1: BUILDINGS OF LOCAL IMPORTANCE AND NON-DESIGNATED HERITAGE ASSETS

Planning permission will only be granted where it would involve the demolition of, or substantial alteration to, the external appearance of:

- any building designated as being of local importance on the Local List, and
- any non-designated heritage assets,

when it can be demonstrated:

- a) all reasonable steps have been taken to retain the building, including examination of alternative uses compatible with its local importance; and
- b) retention of the building, even with alterations, would be demonstrably impracticable; and
- c) the public benefits of the redevelopment scheme outweigh the retention of the building.

Development proposals that would affect a locally important or non-designated heritage asset, including its setting, will be expected to conserve its significance, and any harm will be weighed against the public benefits of the proposal, including securing its optimum viable use.

This policy contributes towards achieving the Cheltenham Plan Vision: Theme A - objective a; Theme C - objective a.

BUILDINGS OF LOCAL IMPORTANCE

- 9.15. In addition to buildings of local importance and non-designated heritage assets, there are other buildings and structures in the Borough which are of particular local importance for their distinctiveness or contribution to the visual or historic character of the area. Frequently, such buildings are within conservation areas, which provide protection from precipitate demolition. However, the demolition of non-residential buildings outside conservation areas is not subject to planning control. An Index of Buildings of Local importance has been published and will be periodically reviewed. Where continuation of the original use is no longer feasible, the Council will support a change of use, or where appropriate, the inclusion of the building in a wider scheme of development.

POLICY HE2: NATIONAL AND LOCAL ARCHAEOLOGICAL REMAINS OF IMPORTANCE

There will be a presumption in favour of the physical preservation in situ of nationally important archaeological remains and their settings.

Development affecting sites of local archaeological importance will be permitted where the remains are preserved (note 1):

- a) in situ; or
- b) by record, if preservation in situ is not feasible.

Where remains are to be preserved in situ, measures adequate to ensure their protection during construction works will be required.

This policy contributes towards achieving the Cheltenham Plan Vision: Theme C - objective a.

Note 1: The preservation in situ or the excavation and recording of remains prior to and during development should be supervised or undertaken by a competent archaeological organisation.

NATIONAL AND LOCAL ARCHAEOLOGICAL REMAINS OF IMPORTANCE

- 9.16. Development affecting the Borough's important archaeological heritage must, wherever possible, preserve remains in situ and protect their settings. In instances where development affects sites of local archaeological importance and preservation in situ is not feasible, it will be important that these finite, non-renewable resources are appropriately recorded.
- 9.17. In considering planning applications affecting sites of known or potential archaeological interest, the Council will consult and be guided by the County Archaeologist and the Gloucestershire Historic Environment Record. In order to assess the archaeological implications of a proposed development, the Council

may request a developer to commission an archaeological assessment and, where appropriate, request limited excavation, before determining the planning application.

POLICY HE3: ADVERTISEMENTS, SIGNS AND HOARDINGS IN CONSERVATION AREAS

Advertisements and signs in conservation areas will be supported providing that they are appropriate in:

- Type
- Size
- Colour
- Illumination
- Siting

And respect the character of the building, site and surrounding area, and be of an appropriately high standard of design, materials and finish.

The erection of advertisement hoardings will not be permitted.

Internally illuminated signage will not be permitted.

Projecting signs in the Promenade, Montpellier Walk, Montpellier Street, Montpellier Avenue and Queen's Circus will be resisted.

This policy contributes towards achieving the Cheltenham Plan Vision: Theme A - objective a; Theme C - objective a.

ADVERTISEMENTS, SIGNS AND HOARDINGS IN CONSERVATION AREAS

- 9.18. Inappropriate and over-extensive signs and advertisements can be particularly damaging to the character of a conservation area. Consequently, the Council will exercise close control of advertisements in these areas; a particularly high standard of design, materials, and finish will be required, and all advertisements will need to suit the particular character of a building and its surroundings. In assessing planning proposals for advertisements on buildings within conservation areas, the Council will have regard to relevant supplementary planning guidance.
- 9.19. As part of the drive to improve the amenity of conservation areas by preventing unnecessary and obtrusive advertisements, the Council will not permit the siting of advertisement hoardings within them.
- 9.20. Certain streets in commercial use in the Central Conservation Area are particularly vulnerable to advertising. In these areas, projecting signs will be resisted, although an exception may be made for traditional hanging signs to public houses.

CONSERVATION AREA REVIEWS

CONSERVATION AREA REVIEW PROCESS

9.21. In line with the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990, the Council will designate conservation areas and undertake reviews of existing designated areas. Conservation Area Character Appraisals and Conservation Area Management Plans will be reviewed and drafted, and a series of consultation exercises including public meetings will be undertaken in order to inform the Character Appraisals and associated Management Plans. Once finalised the Appraisals and Management Plans will be adopted by the Council as Supplementary Planning Documents (SPDs) in order to give the documents sufficient weight to inform decision making.

CENTRAL CONSERVATION AREA

9.22. The Cheltenham Central Conservation Area is currently divided into 19 character areas in order to effectively analyse its diverse character. It is proposed to split up the conservation area into 19 individual conservation areas, so that the special character of each unique area can be appropriately identified.

PROPOSED CHANGES TO CENTRAL CONSERVATION AREA

Table 1: Proposed changes to the Central Conservation Area		
Name	Proposed	Justification of boundary changes
Bath Road Character Area	Bath Road Conservation Area.	N/A
Bayshill Character Area	Bayshill Conservation Area	N/A
College Character Area	College Conservation Area	N/A
Dean Close & Hatherley Park Character Area	Change to boundary; both extension and omission. Dean Close Conservation Area	Changes to the extent of the conservation area include the proposed expansion to include all the Dean Close School sports fields, as the inclusion of the whole of a key characteristic of the area would be more valuable in analysis of the conservation area. Though the form of the Morris Court development is considered to have a negative impact

		<p>on the conservation area due to its design being unsympathetic with the historic context, the proposed inclusion of the site would present the opportunity to influence any future development, with the aim of enhancing the character of the conservation area. The inclusion of a row of striking Edwardian houses to the south of the area would enhance the architectural interest of the conservation area.</p> <p>The suggested omission of an area centering on Hatherley Court is due to the surrounding late 20th century housing development having an appearance that is not in keeping with the prevalent special character of the conservation area. The nearby Court Gardens public park is proposed to be excluded, as given its late formation as a public park it has limited historic significance. It is considered that the omission of this part of the Conservation Area would give the area a more coherent character and appearance.</p>
Eldorado Character Area	Eldorado Conservation Area	N/A
Fairview & All Saints Character Area	Fairview & All Saints Conservation Area	N/A
Lansdown Character Area	Proposed extension to the boundary. Lansdown Conservation Area	The proposed extension of the Conservation Area includes a small area centring on Polefield House, in order to influence any future development on this site in a prominent location.
Leckhampton Character Area	Leckhampton Conservation Area	N/A
Lower High Street Character Area	Proposed extension. Lower High Street Conservation Area	The proposed extension is in response to development that has taken place on the southern boundary of the area.
Montpellier	Montpellier	N/A

Character Area	Conservation Area	
Old Town Character Area	High Street Conservation Area	N/A
Pittville Character Area	Pittville Conservation Area	N/A
St.Luke's Character Area	St. Luke's Conservation Area	N/A
St.Paul's Character Area	St. Paul's Conservation Area	The omission of an area of late 20 th Century buildings. It is considered that the omission of this part of the Conservation Area would give the area a more coherent character and appearance.
Suffolk Square Character Area	Suffolk Square Conservation Area	N/A
Sydenham Character Area	Sydenham Conservation Area	N/A
The Park Character Area	Proposed extension. The Park Conservation Area	The addition of a section of Moorend Park Road into the Park Conservation Area would ensure that areas with historical and architectural similarities will be unified under the designation.
The Suffolks Character Area	The Suffolks Conservation Area	N/A
Tivoli Character Area	Tivoli Conservation Area	N/A

PROPOSED CHANGES TO EXISTING CONSERVATION AREAS

BAFFORD

9.23. No change

CUDNALL STREET

9.24. Proposed changes to the extent of the Conservation Area include an expansion at the western end of the area in order to provide the means to influence the design of any future development and to offer protection to the street-scape and green

space at a key location. Land to the east is proposed to be removed due to the form of the development being different from the rest of the conservation area.

PRESTBURY

- 9.25. The proposed expansion of the Prestbury Conservation Area would unify established boundaries and bring more cohesion to the designated area.

ST. MARY'S

- 9.26. The omission of a development on a former garden nursery site is put forward as the design of the housing being different from that of the rest of the conservation area.

SWINDON VILLAGE

- 9.27. No change

THE POETS

- 9.28. No change

PROPOSED NEW CONSERVATION AREAS

LEDMORE ROAD

- 9.29. Ledmore Road contains houses that were specifically constructed as Foreign Office Housing for the managerial staff of GCHQ. Given the architectural interest of the design and the historic significance of GCHQ in the town, a new conservation area is proposed in order to preserve the character and appearance of the area.

PARK LANE

- 9.30. A compact area around Park Lane, Prestbury has historic interest due primarily to the moated site and architectural interest due to the design of the buildings fronting Park Lane. It is proposed that the location be designated as a conservation area in order to preserve the architectural and historic significance.

10. BIODIVERSITY AND GEODIVERSITY

CONTEXT

- 10.1. Although often perceived as being essentially a man-made environment, the town of Cheltenham contains many habitats that harbour a rich array of wildlife. Ponds, railway cuttings, hedges and verges, small copses, parks, cemeteries, school playing fields, allotments and even old buildings, all host a wealth of species ranging from larger mammals like foxes and badgers to wild flowers and butterflies.
- 10.2. The rural areas of the Borough also contain some very significant habitats; the limestone grassland flora of Leckhampton Hill, which is rich in plant and insect species, and the ancient woodlands of the Cotswold escarpment being the most prominent features. Most areas of natural vegetation in the countryside support a great diversity of wildlife.
- 10.3. Many wildlife habitats are under severe threat from development and agricultural pressures; even a minor environmental change not requiring planning permission may radically alter the ecological balance and lead to the loss of valuable species. At the same time, wildlife areas need to be managed to ensure that certain invasive species do not destroy more sensitive flora and fauna; sycamores and gorse can rapidly overrun a habitat and destroy the ecosystem's ability to support a diversity of wildlife.
- 10.4. Part 3 of the Countryside and Rights of Way Act 2000 (the CROW Act) gives protection to wildlife and natural features by making provision for the conservation of biological diversity, and by improving protection for Sites of Special Scientific Interest (SSSIs) in England and Wales together with the enforcement of wildlife legislation.
- 10.5. The JCS recognises the need to protect and conserve wildlife and habitats. Policy SD9 highlights the importance of protecting sites from development that would have a harmful effect on their nature conservation and biodiversity interests. This policy takes into account all sites with conservation interest, including international, national, and locally-designated sites as well as non-designated sites and assets.
- 10.6. One of the essential tools in helping to inform planning decisions on biodiversity is the Gloucestershire Nature Map. This is a comprehensive resource compiled by the Gloucestershire Biodiversity Partnership as part of the UK Biodiversity Framework

(2012) and represents an assessment of biodiversity opportunities for the county. The identified tracts of land, called Strategic Nature Areas (SNAs), show the prioritised areas for the maintenance and expansion (through restoration and/or re-creation) of Priority Habitat (Section 41 of the NERC Act 2006) at a landscape scale across Gloucestershire. This biodiversity enhancement map is a spatial representation of the county's targets for Priority Habitat and embodies a 50 year vision which will allow biodiversity to adapt to climate change and help secure healthy functioning ecosystems.

- 10.7. The Gloucestershire Nature Map points to the areas of greatest potential for restoration and creation of Priority Habitat with a view to establishing ecological networks that support healthy functioning ecosystems. The Map is based on the inclusion of existing areas of identified wildlife value but does not include all designated or local sites of importance for wildlife, or landscape or built features of importance for flora and fauna, or priority habitat in the county. SNA's also do not include all the areas where priority habitat could exist. They simply identify where there is the best opportunity to build coherent and resilient ecological networks without implying that areas outside these designations have no biodiversity or that biodiversity should not be conserved and enhanced there.

CHELTENHAM'S BIODIVERSITY RESOURCE

- 10.8. The following features comprise the most significant elements of Cheltenham's biodiversity resource:

FEATURES OF NATIONAL IMPORTANCE

SITES OF SPECIAL SCIENTIFIC INTEREST (STATUTORY DESIGNATION)

- 10.9. SSSIs are designated by Natural England because of their flora, fauna, geological or physiographical features, and are regarded by the NPPF as being of national importance. There is one such site within the Borough at Charlton Kings Common and Leckhampton Hill. Natural England must be consulted over any planning applications for development within or which may indirectly affect the SSSI.
- 10.10. The Council, as landowner, is committed to the protection of this area and will give priority in its management to nature conservation interests. This is specifically addressed within the management plan for Leckhampton Hill and Charlton Kings Common.

LEGALLY PROTECTED SPECIES

- 10.11. The Countryside and Rights of Way Act 2000 and the Conservation (Natural Habitats &c.) Regulations 1994 legally protect certain species and their habitats. Other species are protected under their own legislation, for example the protection of Badgers Act 1992. Of particular relevance to Cheltenham are the habitats of the barn owl, badger and bat. This list is not exhaustive and other habitats may also be relevant.
- 10.12. It is recognised that many legally protected species may be found outside designated sites and consequently require special attention wherever they exist. Where protected species are known or suspected to exist the applicant will be expected to supply information detailing how the development will affect the protected species and what measures will be undertaken to mitigate the impact of the development on the species.
- 10.13. In accordance with JCS policy SD9 the presence of a protected species is a material consideration in the determination of a planning application. Where protected species are known or suspected to exist, applicants will be required, at the time of the application, to provide appropriate survey/mitigation information to determine the likely effect. The Borough Council will seek the advice of Natural England and Gloucestershire Wildlife Trust (GWT) to determine whether the requirements of legally protected species and their habitat have been adequately taken into account.

DESIGNATED LOCAL NATURE CONSERVATION SITES AND OTHER ASSETS OF DEMONSTRABLE VALUE TO BE CONSERVED AND ENHANCED UNDER JCS POLICY SD9 (II) (NOT AN EXHAUSTIVE LIST)

REGIONALLY IMPORTANT GEOLOGICAL/GEOMORPHOLOGICAL SITES (RIGS)

- 10.14. In 1990 the RIGS programme was established following the need to record and conserve important geological/geomorphological sites. RIGS in Gloucestershire were identified and researched by Gloucestershire Geoconservation and are now overseen by the Gloucester Geology Trust. RIGS sites have limited legal status, but are treated in much the same way as Key Wildlife Sites, and are considered important for their aesthetic, cultural, amenity, historical and wildlife value, as well as providing opportunities for education and research. There are two RIGS in Cheltenham Borough, at Little Herberts Railway Cutting and Charlton Kings Common.
- 10.15. Though there is currently no Geodiversity Action Plan for Gloucestershire, it is likely that one will be prepared during of the lifetime of the Plan and that this will help inform decision-making in these areas.

KEY WILDLIFE SITES

- 10.16. GWT has compiled a schedule of 850 key wildlife sites. These sites are designated for their nature conservation value, which is of countywide significance. Cheltenham Borough contains six of these. Such sites are considered to contain features of countywide importance, either through their rarity or the fact that they are typical to Gloucestershire and seldom found elsewhere.
- 10.17. Key wildlife sites in Cheltenham Borough are:
- Gloucestershire Wildlife Trust Reserve at the Kingham Line
 - Ravensgate Hill (Wistley Hill) - consisting of steep unimproved limestone grassland and scree.
 - 5.5 ha of ancient woodland at Timbercombe.
 - 3.6 ha of species rich ridge and furrow meadow at Ashgrove Farm.
 - 5 ha of ancient woodland at Glenfall Wood
 - unimproved grassland at Fiddlers Green Lane.

LOCAL NATURE RESERVES (STATUTORY DESIGNATION)

- 10.18. Local Nature Reserves (LNR) are designated and managed by local authorities. They are places with wildlife or geological features that are of special interest locally which provide opportunities for study in natural surroundings. Any site may qualify for LNR designation, providing that it is capable of being managed by the local authority, i.e. is in their ownership, leased from the landowner or managed under agreement. Prior to declaration, Natural England must be consulted and can offer discretionary grant aid and expert advice. Local interest groups such as the GWT should also be brought into the designation process. There are currently two designated LNRs at Griffiths Avenue and Pilley Bridge; the Council, in conjunction with Natural England and local interest groups will consider identifying and designating further local nature reserves during the course of the plan period.

NON-STATUTORY NATURE RESERVES

- 10.19. Important wildlife areas, which are not necessarily capable of being managed by local authorities, can also be largely safeguarded from future development. Local authorities can designate non-statutory nature reserves with the agreement of the land owners as evidence of their intent to maintain the wildlife importance of the area, particularly in urban areas, where small, undeveloped plots of land or large gardens provide a haven for wildlife and are often more accessible to the people who live in these areas than is much of the countryside.

- 10.20. Provided there is sufficient local interest, non-statutory designation can ensure protection of sites at minimal cost. The Council will, in conjunction with local interest groups, consider identifying and designating non-statutory nature reserves with the agreement of landowners during the course of the plan period.
- 10.21. In addition to designating land as non-statutory nature reserves, the Council may also apply for Green Flag and Green Pennant recognition. Both these schemes recognise the importance of accessible green spaces and green heritage managed for recreation and nature conservation purposes. Cheltenham has been entering parks into the Green Flag Awards since 2005 and has consistently won flags for Naunton Park, Hatherley Park, Montpellier Gardens, Springfields Park and Pittville Park.

OTHER HABITATS

- 10.22. In addition to the protection and enhancement of areas of particular wildlife and geological significance, the Council is concerned to ensure that other habitats and features are conserved and improved. The Council recognises the contribution that small landscape features, such as shrubs and thickets, ponds, meadows and copses can make to the ecology and biodiversity of an area, especially where such features are linked.
- 10.23. Continuous green areas, such as large linear open spaces, hedgerows, tree-lined roadside verges or banks, disused railway lines or watercourses, and green lanes have greater ecological value than isolated spaces. Such 'green corridors' provide connected linkages for wildlife through the developed areas of the town or the countryside, as well as being important sites in their own right.

THE WATER ENVIRONMENT

- 10.24. The water environment comprises rivers, streams, lakes, ponds and groundwater. Protecting and enhancing the quality of the water environment is important for amenity, recreation and wildlife and is the responsibility of the Environment Agency. The Agency has particular responsibilities for the conservation of landscape, flora, fauna and geological features which are dependent on the aquatic environment and also has duties to prevent pollution of the water-based environment.
- 10.25. The Borough Council will continue to work alongside the Environment Agency in meeting its conservation objectives and will require consideration of the impact of development upon the ecology and wildlife potential of the water-based environment.

- 10.26. It will also seek to promote and enhance the natural water system in the Borough by making decisions that:
- conserve existing areas of value within river corridors;
 - assist in the restoration and enhancement of watercourses for the purposes of conservation and amenity;
 - encourage developers to fully integrate watercourses into their developments;
 - encourage developers to apply sustainable drainage principles when designing land drainage systems.

DEVELOPMENT PROPOSALS AND BIODIVERSITY

- 10.27. The Council will seek to protect all species and habitats listed in the UK Biodiversity Framework and Gloucestershire Nature Map from development that would harm those features in accord with legislative requirements and Policy SD9 of the JCS. The Council will normally require a survey of biodiversity features to be submitted with planning applications which will need to be accompanied with an account of appropriate measures to help safeguard such features during construction and thereafter.
- 10.28. Where there is conflict between the development proposal and the need to protect those natural features identified, the Council will weigh the relative merits of the development proposal and the value of the natural feature or habitat under threat and, in any case, will seek advice from Natural England, the Gloucestershire Wildlife Trust, or other professional bodies as necessary and appropriate.
- 10.29. A holistic approach will be adopted in the assessment of proposals which takes into account not only the natural characteristics of each individual site but also the wider context of that site and how it relates to surrounding biodiversity networks and ecosystems. A key consideration will be the cumulative effect of allowing one development after another and the potential damage that can arise through piecemeal erosion of biodiversity interests.

11. RESIDENTIAL DEVELOPMENT

CONTEXT

- 11.1. To complement the strategic allocations being made through the JCS and in order to ensure that Cheltenham Borough meets its objectively assessed need (OAN) up to 2031, the Cheltenham Plan is making a number of allocations for both residential development and mixed-use development through Policies H1 and H2. These allocations will not only ensure that identified needs are met over the plan period but that there is a steady supply of land for housing during that time which helps deliver a wide choice of high quality homes and contributes towards the creation of more sustainable, inclusive and mixed communities.
- 11.2. National policy requires local plans to identify a supply of specific deliverable sites sufficient to provide five years' worth of housing against the identified housing requirement. The OAN for Cheltenham has been assessed as part of the JCS process; the overall housing requirement for the whole of the JCS area between 2011 and 2031 is 35,175 dwellings with the Cheltenham-specific figure being **10,917** units.
- 11.3. At the time the Joint Core Strategy was produced, the Cheltenham Plan capacity which contributed towards the total supply for Cheltenham had not been finalised, and was therefore based on the best information available at the time. Furthermore an existing allocation from the Cheltenham Borough Local Plan (Second Review) 2006 was included for 10 dwellings in the latter part of the plan period, however, based on further evidence it is no longer proposed for allocation in the new Local Plan. Further work has now taken place on evaluating the sites to be allocated within the new Plan which the following table reflects, and fully explains the differences between the Joint Core Strategy trajectory and the new figures being proposed.

Table 2: Housing to be Delivered in Cheltenham Between 2011-2031	
Completions since 2011	1724
Dwellings already with planning permission	1524
Strategic allocations being made through the JCS	5385
Cheltenham Plan residential allocations through Policy H1	440

Cheltenham Plan mixed use allocations including residential through Policy H2	350
Urban Capacity Permissions (Previously intending to allocate, but since received permission and development has begun)	446
Contributions arising from planning consent granted at Farm Lane (Tewkesbury)	377
Windfall allowance (less than 5 units)	784
Total supply 2011-2031	11030
Objectively Assessed Need 2011-2031	10917

LAND ALLOCATED FOR HOUSING DEVELOPMENT

POLICY H1: LAND ALLOCATED FOR HOUSING DEVELOPMENT

The sites listed in Table 3, and which are shown on the Cheltenham Plan Proposals Map, are allocated for residential development and are delineated on Plans HD1 – HD8 below. The red lines on Plans HD1 – HD8 mark the boundaries of the allocations and are separately and collectively part of this policy.

Each allocation is supported by site-specific policies HD1-HD8 below to provide further detailed guidance on the development of these sites. These site-specific policies also form part of this policy.

The contents of Policy H1 reflect the evidence bases of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy and the Cheltenham Plan.

This policy contributes towards achieving the Cheltenham Plan Vision: Theme A – objective b; Theme C – objectives a and b.

Table 3: Land Allocated for Housing Development

Reference	Location	Designation
HD1	Christ College Site B	70 dwellings
HD2	Former Monkscroft Primary School	60 dwellings
HD3	Bouncer's Lane	20 dwellings
HD4	Land off Oakhurst Rise	25 dwellings
HD5	Land at Stone Crescent	20 dwellings
HD6	Brockhampton Lane	20 dwellings
HD7	Prior's Farm Fields	50-90 dwellings

HD8	Old Gloucester Road	175 dwellings
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SITE SPECIFIC POLICIES

- 11.4. The existing built up area of Cheltenham is tightly constrained by Green Belt and AONB with very little undesignated land in which to expand. It is therefore logical to make the most of previously developed and underused sites within the existing urban area. This approach is also in line with JCS Policy SP1 which aims to see development delivered within existing urban areas and Strategic Allocations.
- 11.5. The sites included in the policy are being advanced following assessment according to a clearly defined methodology. All sites are of 0.5ha or more in size and capable of accommodating 10 or more residential units. Sites were chosen sequentially; brownfield development was explored first, those within the PUA area or identified as with development potential in the JCS, and finally constrained sites in the PUA, those in the Green Belt and AONB. Sites were chosen which would demonstrate a public benefit in allocation through for example masterplanning and those not so advanced in the development management process that approval was likely to be granted before plan adoption.
- 11.6. The threshold of 0.5ha /10 units has been chosen as it reflects the definition of 'major development' in the Development Management Procedure Order (2015). Further information, including individual site assessments and the Council's expectations for development on each site, are set out in the Housing Background Paper published separately.

SITES WITHIN THE URBAN AREA

POLICY HD1: CHRIST COLLEGE SITE B	
Site description	Greenfield site within the urban area, previously used as school playing pitches. The playing pitch assessment produced as part of Cheltenham and Tewkesbury’s Social, Sport and Open Space Strategy categorises the site as ‘disused’ so it falls outside of the scope of Sports England. However, paragraph 74 of the NPPF still applies. In this case the field has not been used for over 5 years and has no facilities associated with it. It was once used by Christ College but as this school has moved the field no longer has a primary use and has no reasonable chance of coming back into use as a playing field.
Site area	2.11ha
Constraints	<ul style="list-style-type: none"> • Possible land contamination • Adjacent to railway line
Site specific requirements	<ul style="list-style-type: none"> • Approximately 70 dwellings • Vehicle access from Arle Road • Measures to mitigate the impact of noise and vibration caused by railway line • Safe, easy and convenient pedestrian and cycle links within the site and to key centres • A layout and form that respects the existing urban characteristics of the vicinity

POLICY HD2: MONKSCROFT PRIMARY SCHOOL	
Site description	The site comprises the playing fields of the former Monkscroft Primary school, between Shakespeare Road to the north and Shelly Road to the south. The main school buildings have been demolished and replaced with a residential care home. The field has no public access or rights of way across it.
Site area	1.8ha
Constraints	<ul style="list-style-type: none"> • Loss of playing fields (unused)
Site specific requirements	<ul style="list-style-type: none"> • Approximately 60 dwellings • Safe, easy and convenient pedestrian and cycle links within the site and to key centres, particularly Coronation Square • A layout and form that respects the existing urban characteristics of the vicinity • A layout and form of development that respects the character and significance of the St Marks Conservation Area

POLICY HD3: BOUNCER'S LANE

Site description	This site is a former employment site in the east of the town. It is set within a residential area and borders Cheltenham Cemetery to the east. A number of attributes contribute towards allowing it to change from employment to residential use. The surrounding parts of the site have been given planning permission for 58 dwellings. A contributing factor to the planning permission was that the site had been vacant for several years and evidence was provided which showed that it was unlikely to come back into employment use.
Site area	0.5ha
Constraints	<ul style="list-style-type: none"> • Contaminated land • Adjacent heritage assets • Existing employment
Site specific requirements	<ul style="list-style-type: none"> • Approximately 20 dwellings • Safe, easy and convenient pedestrian and cycle links within the site • A layout and form that respects the existing urban characteristics of the vicinity • A layout and form of development that respects the existing planning permission for the adjacent site

POLICY HD4: LAND OFF OAKHURST RISE

Site description	This site was not known to the council until the Preferred Options consultation was already prepared. It is a greenfield site within the existing urban area and consequently has good transport links. However the site is subject to a number of constraints and therefore the allocation of dwellings on the site has been adjusted to accommodate these.
Site area	4ha
Constraints	<ul style="list-style-type: none"> • Steep gradients across the site • Mature trees and hedges • Adjacent listed buildings • Biodiversity • Heritage impacts
Site specific requirements	<ul style="list-style-type: none"> • Approximately 25 dwellings • Safe, easy and convenient pedestrian and cycle links within the site and to key centres • A layout and form that respects the existing urban characteristics of the vicinity

	<ul style="list-style-type: none"> • A layout and form of development that respects the character, significance and setting of heritage assets that may be affected by the development, • Measures necessary to mitigate the traffic impact of the site and to encourage the use of more sustainable transport modes • Protection to key biodiversity assets
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POLICY HD5: LAND AT STONE CRESCENT	
Site description	This is a greenfield site which is situated between playing fields and residential development but is fenced off and not part of any designated Public Green Space. The site was subject to an outline planning application (14/01276/OUT) for around 15 dwellings. Permission would have been granted but a legal agreement remains outstanding. It is unlikely that this permission will be granted but a new application is possible.
Site area	0.5ha
Constraints	<ul style="list-style-type: none"> • Highways access
Site specific requirements	<ul style="list-style-type: none"> • Approximately 20 dwellings • Safe, easy and convenient pedestrian and cycle links within the site • A layout and form that respects the existing urban characteristics of the vicinity

SITES OUTSIDE THE URBAN AREA

11.7. The Cheltenham Plan concentrates on focusing development within existing urban areas. However, the JCS process has indicated two areas outside of the existing urban area of Cheltenham which could be allocated for development in order to meet housing requirements. These are sites which subsequent to the JCS' changes would not be in the Green Belt in the AONB or in a conservation area, have been included. An additional two sites outside of the existing urban area have also been included which are similarly unconstrained by these designations. Once built out, it is intended that these sites will be included within the PUA boundary on review of the Plan.

POLICY HD6: BROCKHAMPTON LANE	
Site description	The site is primarily greenfield land entirely outside but adjacent to the PUA. It is due to be removed from the Green Belt through the JCS process as part of the North West Cheltenham strategic allocation. The site is also outside of the proposed Local Green Space designation.
Site area	0.7ha
Constraints	<ul style="list-style-type: none"> • Within the Green Belt but due to be removed by the JCS
Site specific requirements	<ul style="list-style-type: none"> • Approximately 20 dwellings • Safe, easy and convenient pedestrian and cycle links within the site • A layout and form that respects the existing urban characteristics of the vicinity

POLICY HD7: PRIOR'S FARM FIELDS	
Site description	<p>This is a greenfield site which sits adjacent to a residential area but outside of the existing Principal Urban Area. The western part of the site is a designated Public Green Space including playing pitches and a play area and the eastern part of the site is open fields. The site borders the cemetery to the north, the AONB to the east and new residential development to the south and west. Any housing development would be focused on the east of the site, however, masterplanning is required to reconcile several competing demands on this land and to minimise impact on the AONB (proposals should be in conformity with 2015 AONB study and 2016 update). The final layout and exact quantum of development will be informed by detailed landscape impact work.</p> <p>The site was included as a mixed use scheme in the Preferred Options as a reflection of the various demands on the site. However, since that time plans for the new crematorium have progressed and masterplanning has demonstrated how the site could be presented. For that reason the site is now considered to be a housing site, rather than mixed use.</p>
Site area	5ha
Constraints	<ul style="list-style-type: none"> • Public Green Space • Suggested Local Green Space • Heritage • Access • Competing uses • Landscape especially impacts on the setting of the AONB

Site specific requirements	<ul style="list-style-type: none">• Flood Risk mitigation• Approximately 50-90 dwellings• Safe, easy and convenient pedestrian and cycle links within the site and to key centres• A layout and form that respects the existing urban and rural characteristics of the vicinity• A layout and form of development that respects the character, significance and setting of heritage assets that may be affected by the development• A layout and form of development that respects the visual sensitivity and landscape character of the site as part of the setting for the AONB• Adequate re-provision of sports pitches• Measures necessary to mitigate the traffic impact of the site and to encourage the use of more sustainable transport modes• Protection to key biodiversity assets• Development that does not prejudice the access or egress of the adjacent cemetery
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POLICY HD8: OLD GLOUCESTER ROAD	
Site description	The site has also arisen from the JCS process and will be removed from the Green Belt by that document. The site will require masterplanning, flood assessments and a resolution on the future of the nurseries. In order to maximise the use of the site and ensure a coherent overall scheme. To the north of the allocation there is a historic moat (scheduled monument). The significance and setting of this asset will be an essential consideration in development of the site in accordance with the Plan's heritage assessment.
Site area	11.3ha
Constraints	<ul style="list-style-type: none"> • Green Belt • Flood Risk mitigation • Heritage assets
Site specific requirements	<ul style="list-style-type: none"> • Approximately 175 dwellings • Development proposals should enable a comprehensive scheme to be delivered across the developable area of the site • Safe, easy and convenient pedestrian and cycle links within the site and to key centres • A layout and form that respects the existing urban and rural characteristics of the vicinity • A layout and form of development that respects the character, significance and setting of heritage assets that may be affected by the development • Measures necessary to mitigate the traffic impact of the site and to encourage the use of more sustainable transport modes • Adequate flood risk management across the site



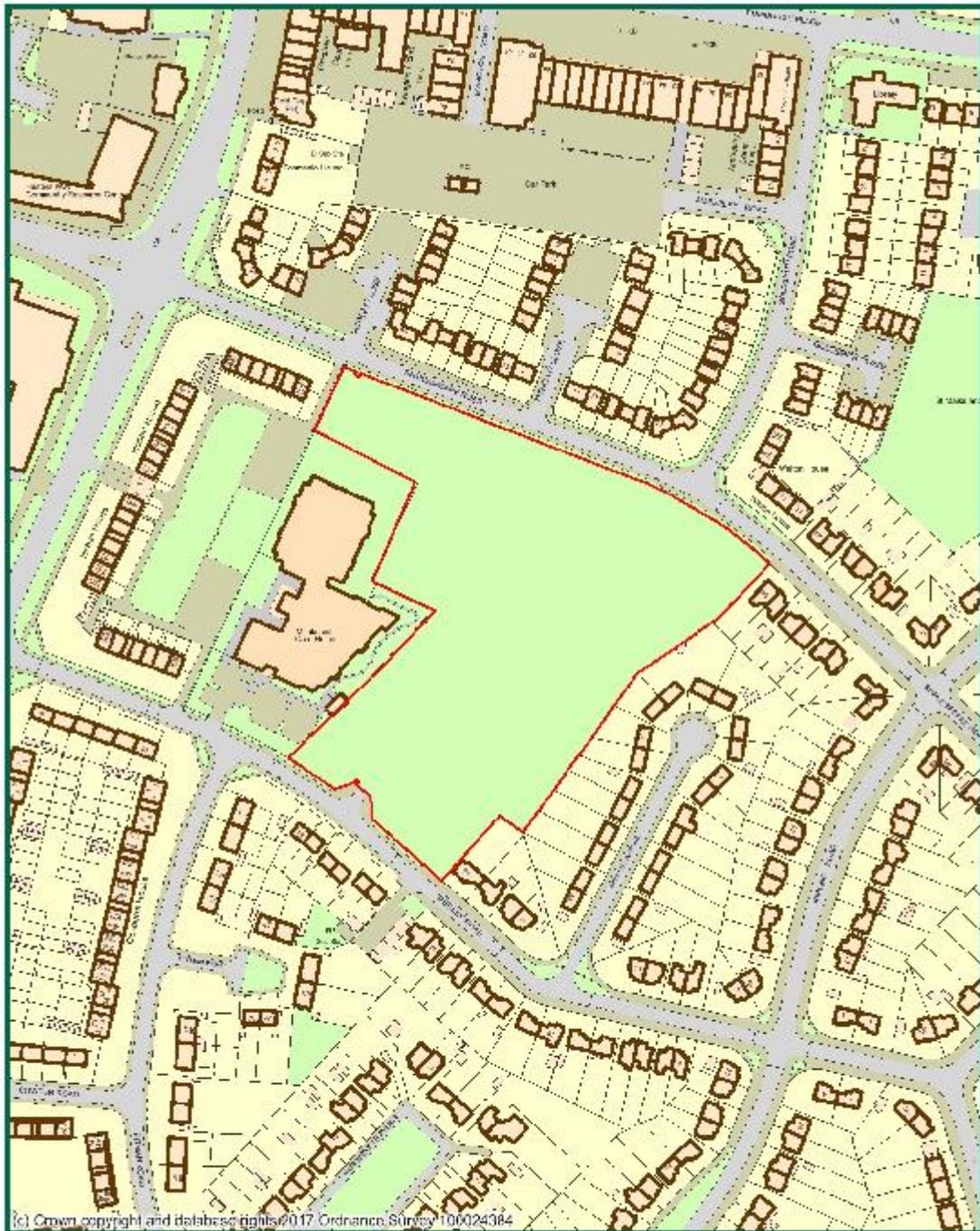
Policy H1: Christ College Site B (HD1)

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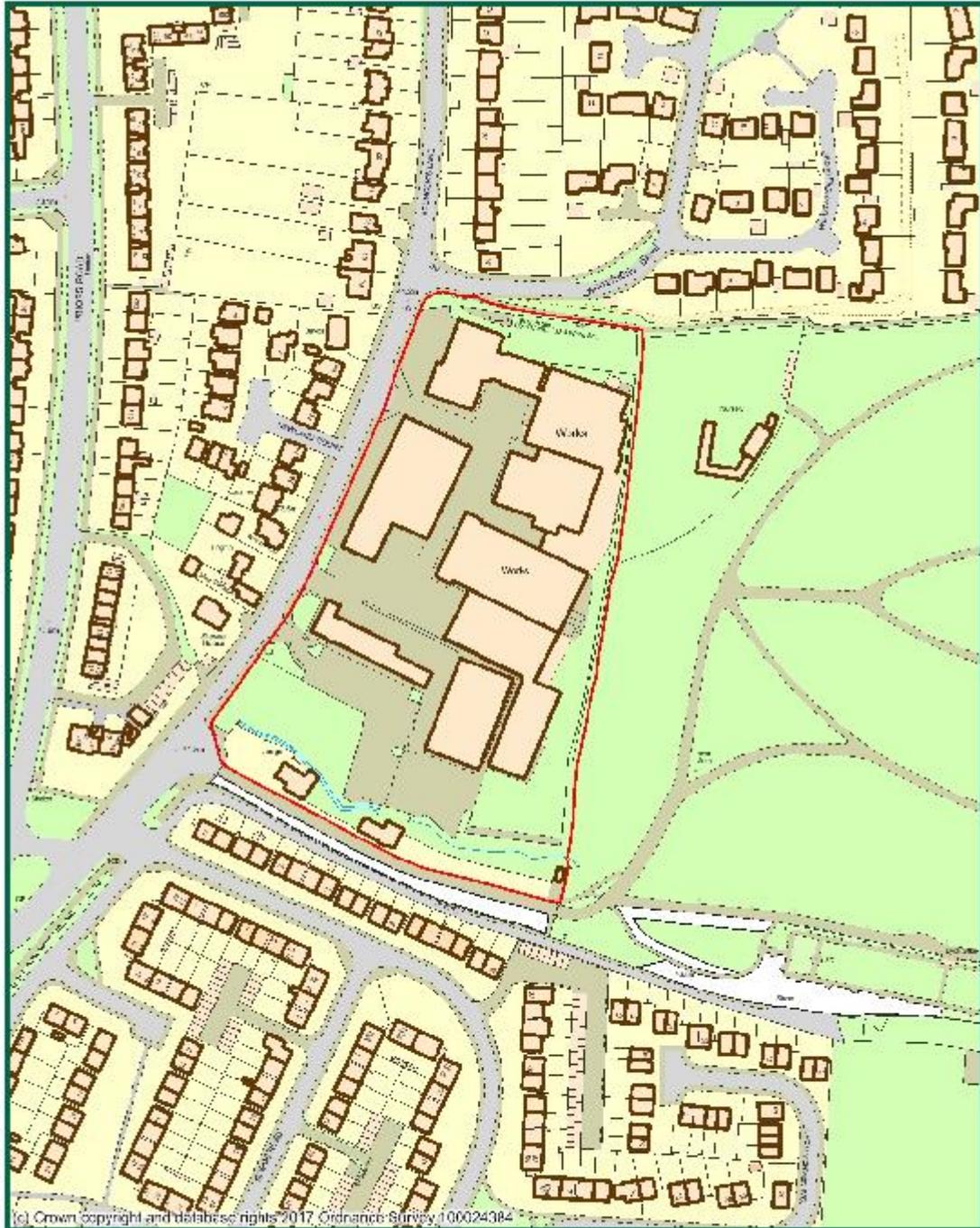
Policy H1: Former Monkscroft Primary School (HD2)

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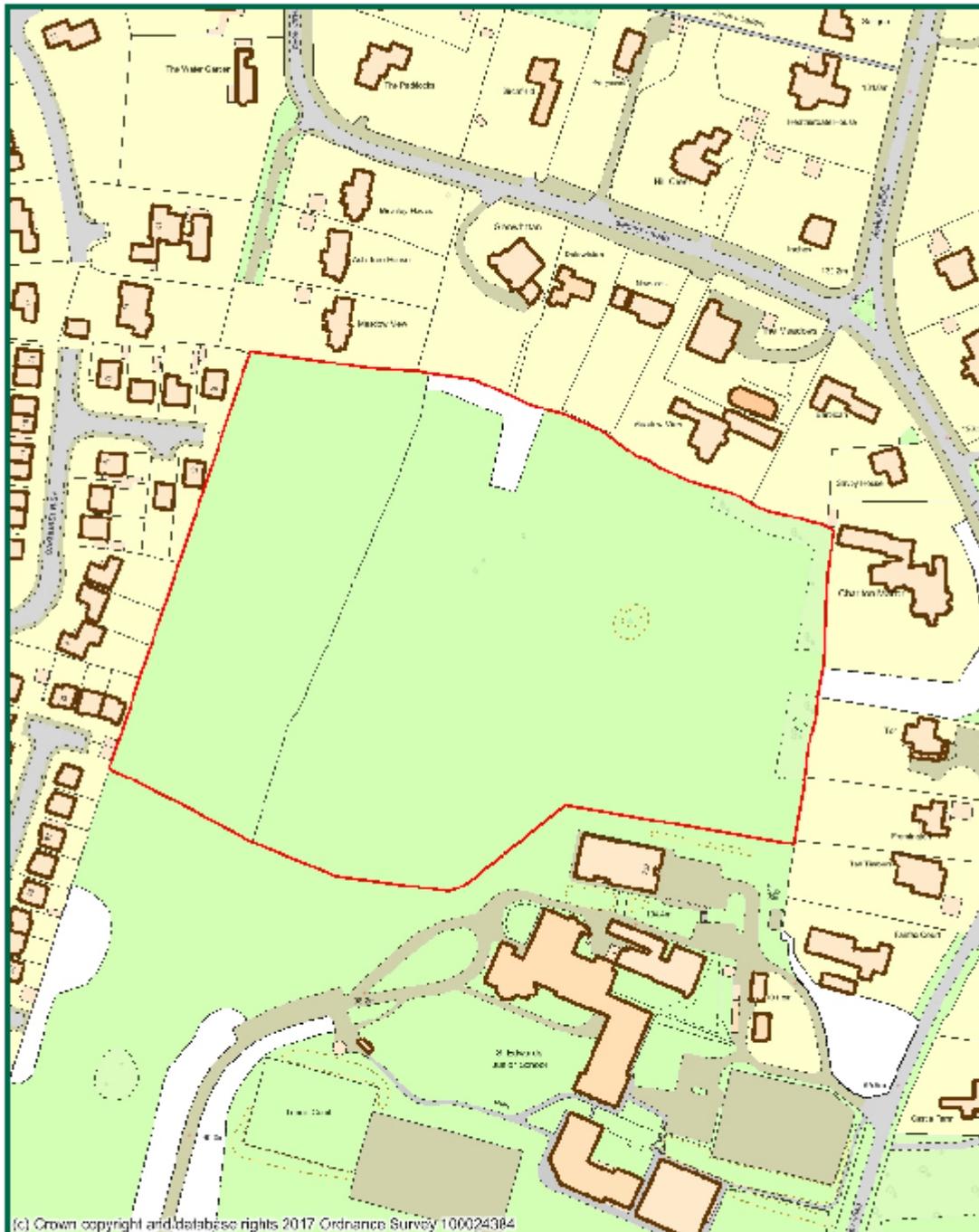
Policy H1: Bouncer's Lane (HD3)

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Policy H1: Oakhurst Rise (HD4)

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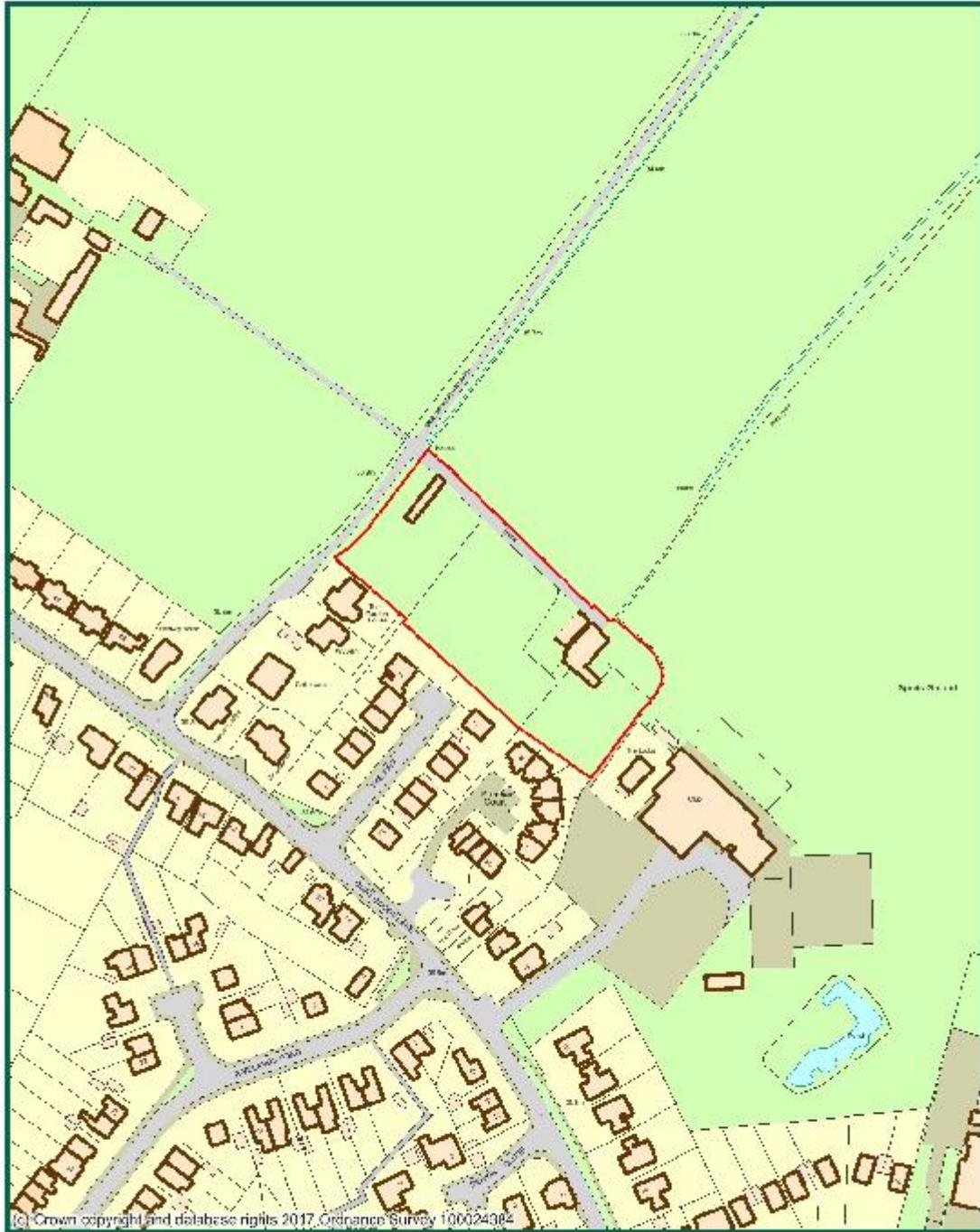
Policy H1: Land at Stone Crescent (HD5)

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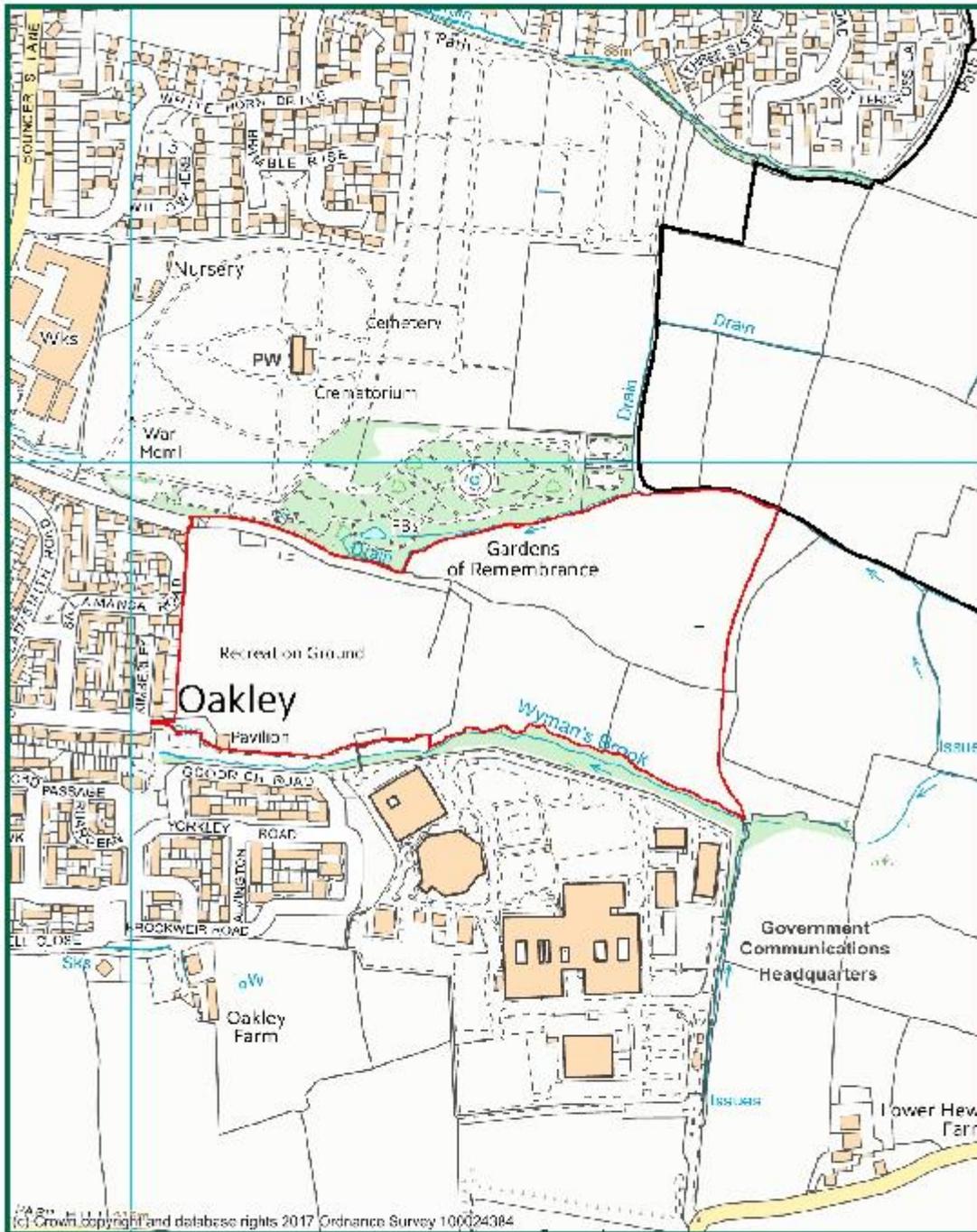
Policy H1: Brockhampton Lane (HD6)

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Policy H1: Prior's Farm Fields (HD7)

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Policy H1: Old Gloucester Road (HD8)

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LAND ALLOCATED FOR MIXED USE DEVELOPMENT

- 11.8. In order to improve new and improved facilities for the community and provide additional housing and employment opportunities, the Council has identified the potential to deliver mixed use development schemes on several sites within the urban area. Combining residential and other uses (including commercial) is considered to be one of the best ways to intensify development and make better use of land to help address the requirement for development to be more sustainable.
- 11.9. By developing sites that have a mixture of residential and other uses, mixed-use developments take advantage of the land upon which they are built during more hours of each day and by more people than a single-use building would be able to do. Depending on the combination of uses delivered, those who live in such developments may not have the same dependence on a car that people who live in more traditional neighbourhoods may have because they can walk or cycle to nearby facilities making it easier for them to stay active and function without a vehicle.

POLICY H2: LAND ALLOCATED FOR MIXED USE DEVELOPMENT

The sites listed in Table 4, and which are shown on the Cheltenham Plan Proposals Map, are allocated for mixed use development and are delineated on Plans MD1 – MD5 below. The red lines on Plans MD1 – MD5 mark the boundaries of the allocations and are separately and collectively part of this policy.

Each allocation is supported by site-specific policies MD1-MD5 below to provide further detailed guidance on the development of these sites. These site-specific policies also form part of this policy.

The contents of Policy H2 reflect the evidence base of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy and the Cheltenham Plan.

This policy contributes towards achieving the Cheltenham Plan Vision: Theme A – objective b; Theme B - objectives a and b; Theme C – objectives a and b.

Table 4: Land Allocated for Mixed Use Development		
Reference	Location	Designation
MD1	Lansdown Industrial Estate	100 dwellings plus no net losses in employment in accordance with policy EM2
MD2	Land at North Place and Portland Street	143 dwellings plus

		appropriate town centre mixed use scheme and car park
MD3	Land at Coronation Square	Regeneration of existing community and retail facilities
MD4	Royal Well and Municipal Offices	Mixed-use redevelopment appropriate for town centre uses
MD5	Leckhampton	Approximately 250 dwellings and a secondary school

POLICY MD1: LANSDOWN INDUSTRIAL ESTATE	
Site description	The site is capable of redevelopment for mixed use including a continued element of employment in better quality units together with some new residential. There would be a net loss of employment land but this should be offset by be an upgrade in the quality and density of premises.
Site area	5.5ha
Constraints	<ul style="list-style-type: none"> • Land contamination • Highways access
Site specific requirements	<ul style="list-style-type: none"> • Approximately 100 dwellings • Approximately 3ha of B-class led employment to be retained with any loss of existing provision being offset by a net gain in the quality (see Policy EM2) and / or the number of jobs provided on the site • Measures to mitigate the impact of noise and vibration caused by railway line • Safe, easy and convenient pedestrian and cycle links within the site and to key centres • A layout and form that respects the existing urban characteristics of the vicinity • 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

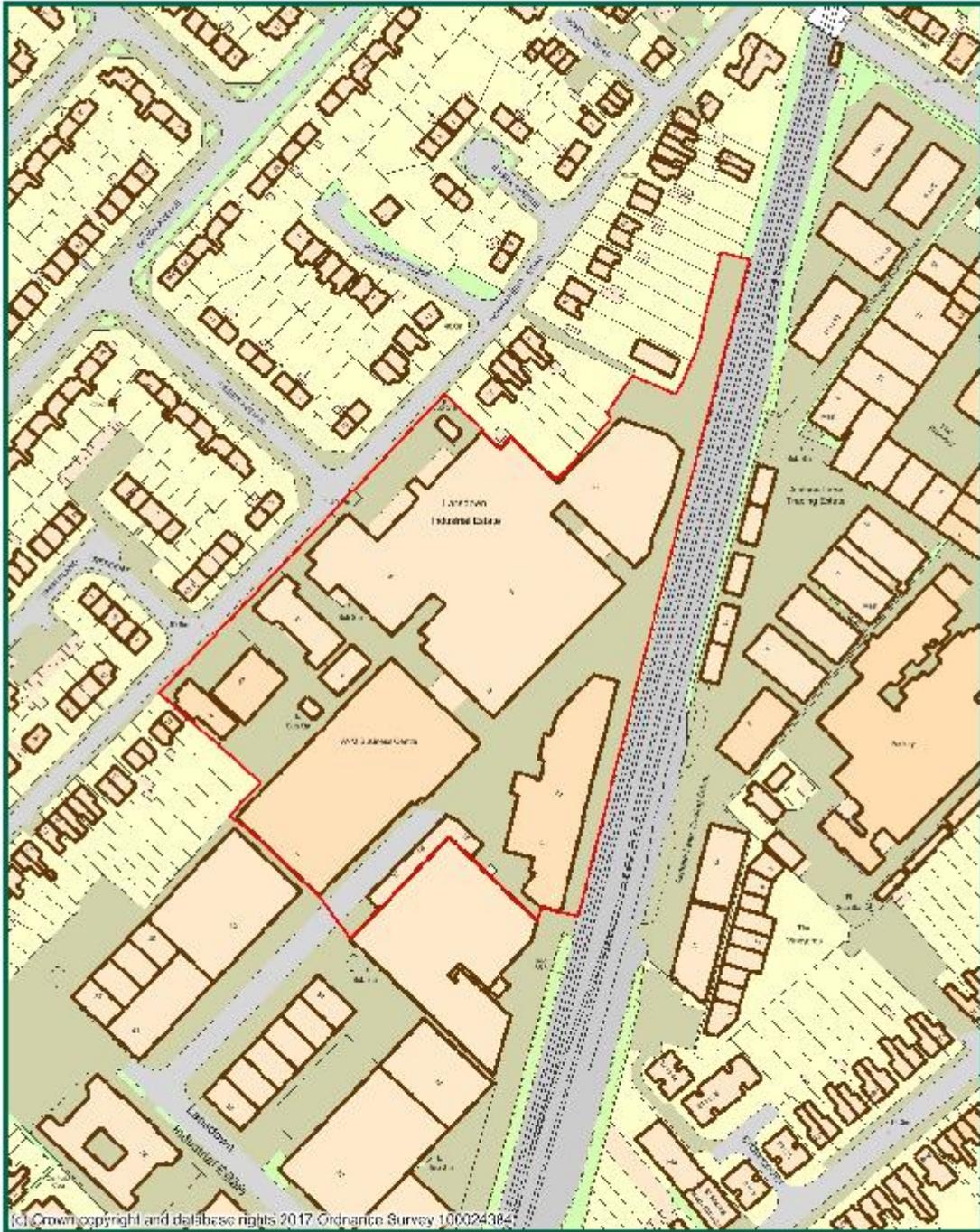
POLICY MD2: NORTH PLACE AND PORTLAND STREET	
Site description	<p>The North Place and Portland Street area was formerly used as the main Coach and Bus station in Cheltenham. The site is approximately 2 hectares in size (3.2 hectares including the highway) and currently provides 813 parking spaces.</p> <p>The site's location within Central Conservation Area dictates that the form, massing and design of any future development need to be sensitive to the adjacent historic environment.</p> <p>Planning permission was granted on the site in 2013 for a large supermarket, car park and 143 dwellings. However, that permission has not yet been implemented and it is likely that a new scheme will be required in order for development to take place. It is anticipated that a new scheme would provide a similar number of dwellings to the existing planning permission.</p>
Site area	2ha
Constraints	<ul style="list-style-type: none"> • Conservation area
Site specific requirements	<ul style="list-style-type: none"> • Approximately 143 dwellings • Provision of an appropriate scale of retail, healthcare and community facilities to meet the needs of the community • A layout and form of development that respects the setting, character and significance of the Conservation Area and other heritage assets • Measures necessary to mitigate the traffic impact of the site • Safe, easy and convenient pedestrian and cycle links within the site and to key points

POLICY MD3: CORONATION SQUARE	
Site description	Coronation Square is a complex site with competing demands and is a key part of wider regeneration projects. Therefore the site will require mixed use masterplanning and careful consideration of how this sits fits within the wider area.
Site area	0.4ha
Constraints	<ul style="list-style-type: none"> • Land ownership • Highways
Site specific requirements	<ul style="list-style-type: none"> • Development proposals that demonstrate an accordance with the ongoing Cheltenham West Regeneration project • Measures necessary to mitigate the traffic impacts of the site, particularly on Princess Elizabeth Way

	<ul style="list-style-type: none"> • Retention and enhancement of local centre facilities including an appropriate scale of retail, healthcare and other community facilities • High quality public transport links and facilities • Safe, easy and convenient pedestrian cycle links within the site and to key centres, providing segregated links where practical
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POLICY MD4: ROYAL WELL AND MUNICIPAL OFFICES	
Site description	This is a developed site within the town centre, currently in use as council offices, bus station, car park and area of open space. It is within the Core Commercial Area and Central Conservation Area and partially within Flood Zones 2 & 3. The site has been subject to a development brief which identifies potential for existing uses to be relocated / redesigned. More recent work has begun on transport modelling and masterplanning to allow for potential changes to highways layout. This could facilitate public realm improvements and a change of use for the historic buildings.
Site area	0.9ha
Constraints	<ul style="list-style-type: none"> • Heritage • Flood risk mitigation • Highways
Site specific requirements	<ul style="list-style-type: none"> • Mixed use scheme made up of town centre appropriate uses • A layout and form of development that respects the character, significance and setting of the Conservation Area and all other impacted heritage assets. • Development proposals that demonstrate accordance with ongoing transport focused masterplanning • High quality public transport facilities including a single, integrated bus interchange • Safe, easy and convenient pedestrian and cycle links with the site and to the wider network

POLICY MD5: LECKHAMPTON	
Site description	Originally a JCS site, development at this location will need to take into account landscape impacts, highways issues and green space. Site boundaries are based on the JCS Inspector's comments in her Note of Recommendations from 21 July 2016. Development at this location will need to ensure that the JCS examination's consideration and findings related to this site are fully taken into account. Along with this, the site has an extensive planning history related to the earlier, larger proposal (13/01605/OUT) the inspector's and Sectary of State's findings in this appeal should also be reflected in any future scheme.
Site area	15ha
Constraints	<ul style="list-style-type: none"> • Local Green Space • Impact on AONB • Flood Risk mitigation • Highways • Heritage assets
Site specific requirements	<ul style="list-style-type: none"> • Approximately 250 dwellings • Provision of a secondary of school with 6 forms of entry • Provision of playing fields for the school on land within the designated LGS • Safe, easy and convenient pedestrian and cycle links within the site and to key centres • A layout and form that respects the existing urban and rural characteristics of the vicinity • A layout and form of development that respects the character, significance and setting of heritage assets that may be affected by the development • A layout and form of development that respects the visual sensitivity and landscape character of the site as part of the setting for the AONB



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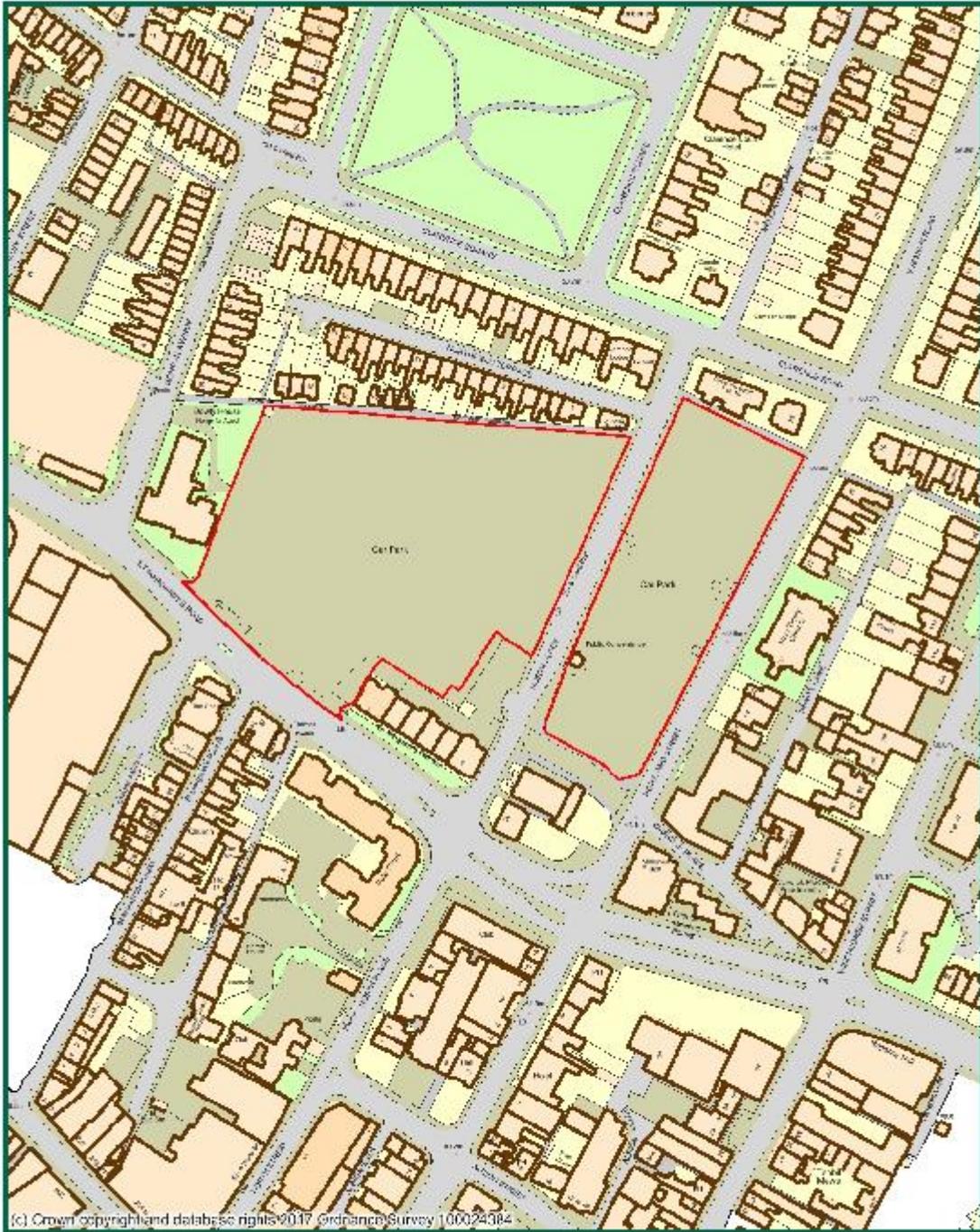
Policy H2: Lansdown Industrial Estate (MD1)

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Policy H2: Land at North Place and Portland Street (MD2)

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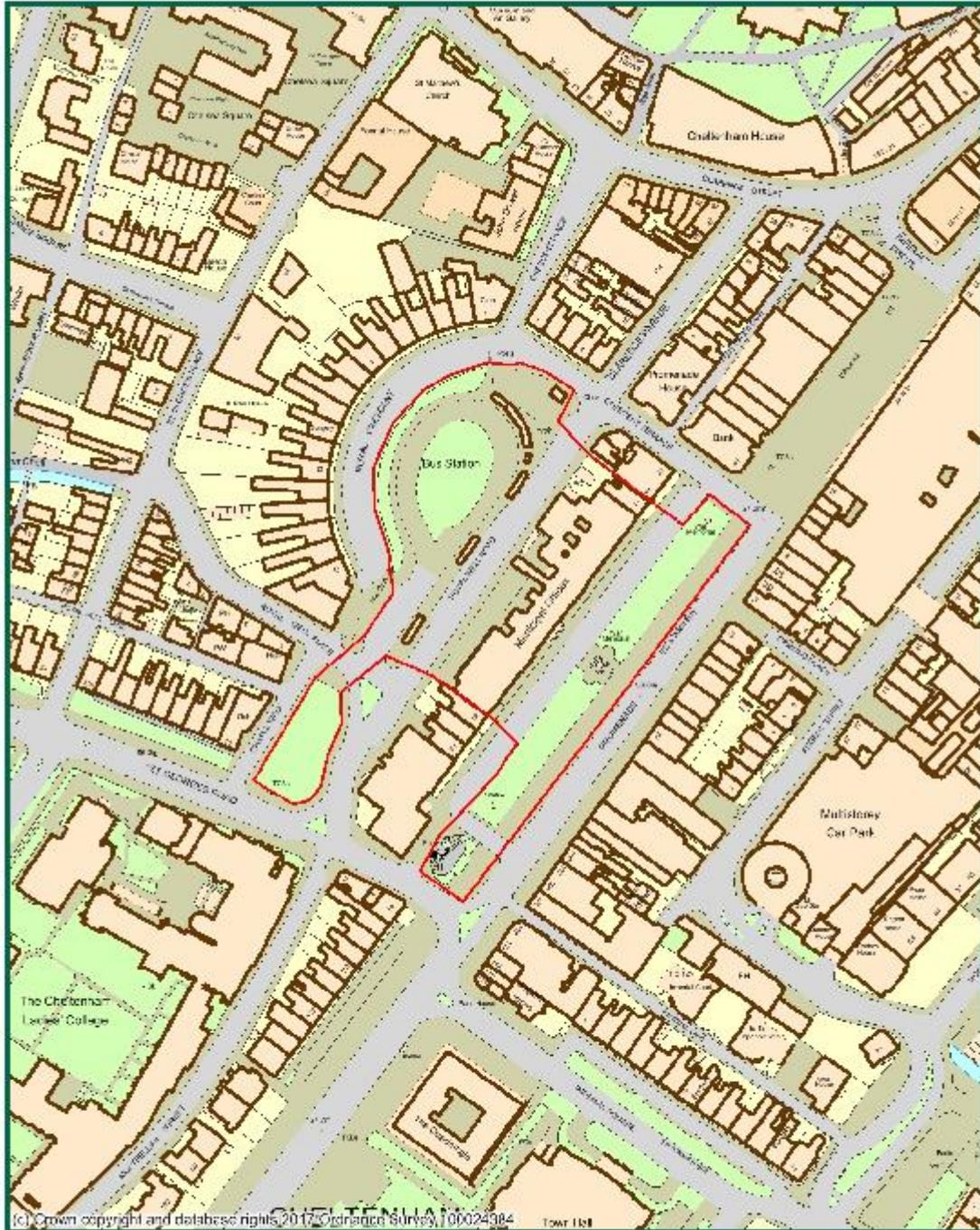
Policy H2: Land at Coronation Square (MD3)

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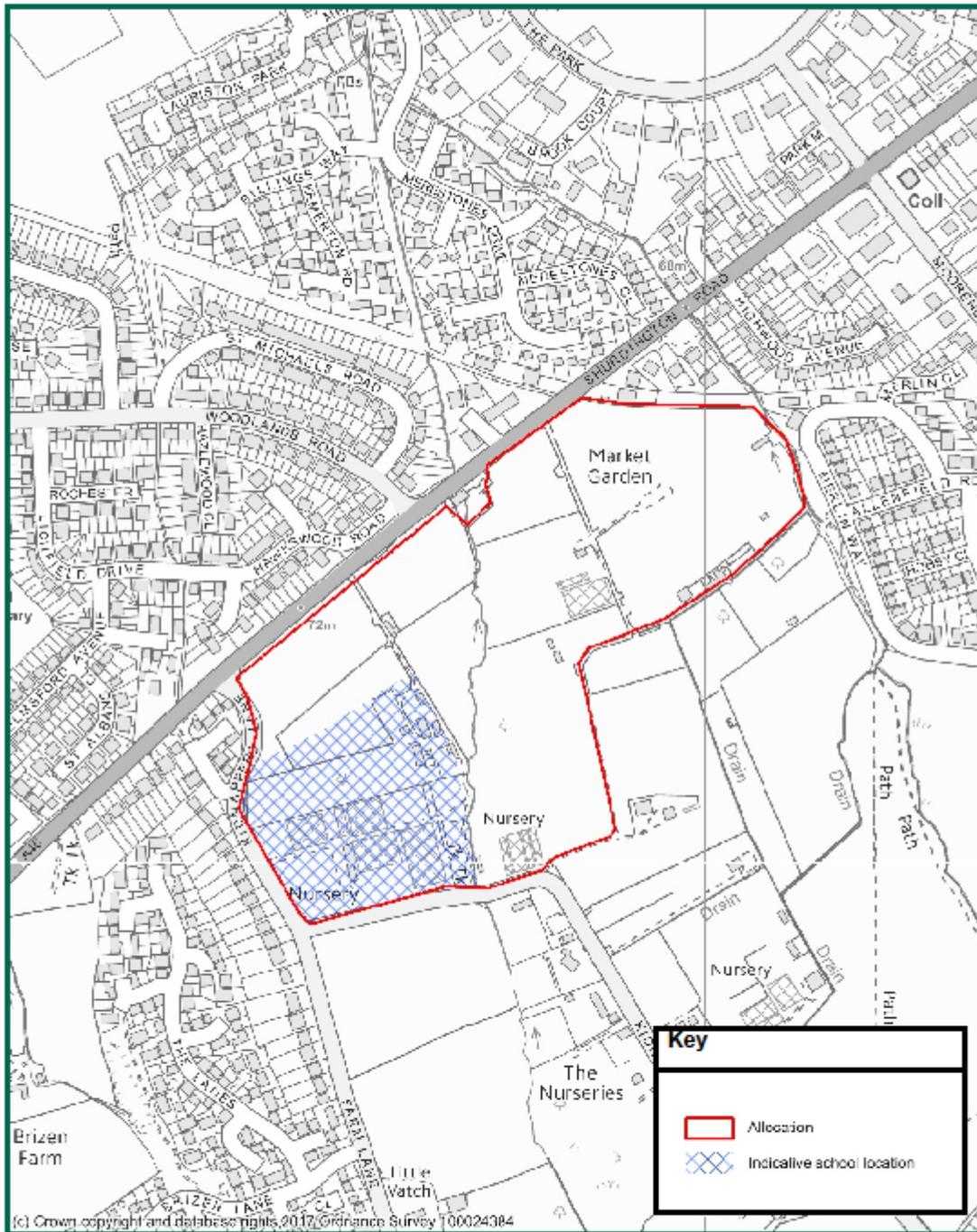
Policy H2: Royal Well and Municipal Offices (MD4)

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Policy H2: Leckhampton (MD5)

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12. HOUSING MIX AND STANDARDS

CONTEXT

- 12.1. The JCS has identified housing need for specific types of dwellings but has delegated policies on meeting those needs to district plans. The policies in this section seek to provide positive support for proposals which will help to meet specific housing needs. The needs for specific, high quality student accommodation and well-designed elderly care provision are key to the future of Cheltenham.

STUDENT ACCOMMODATION

- 12.2. The number of full time students in Cheltenham has grown in the last decade, arising principally from the development of the University of Gloucestershire. The University operates some halls of residence, and is seeking to develop more of these. The Council generally supports the provision of more purpose-built student accommodation, although proposals would need to be judged in the light of other relevant local plan policies.
- 12.3. The University of Gloucestershire projects that student numbers in Gloucester and Cheltenham will increase by 50% over the plan period, resulting in approximately 4,000 additional students (JCS Examination Document 118). This is expected to result in a need for 450 new private dwellings over the plan period which is accounted for within the OAN. In addition to this, the University estimates the need for an expansion of purpose built halls of residence accommodation for students to provide an additional 1,500 bed spaces across the JCS area within the plan period (Policy SD11, Joint Core Strategy).
- 12.4. Since 2012, both Cheltenham Borough Council and Gloucester City Council have worked closely with the University to explore the provision of additional student accommodation with a focus on expansion within existing sites. Many of these additional bed spaces have already been consented between 2011 and the adoption of the JCS, as set out in Table 5.

Table 5: Additional Student Accommodation				
	Requirement	Identified Supply (completions & consents)	Remaining Requirement	Remaining Requirement per annum
Gloucester City Council	1500	556	179	14
Cheltenham Borough Council		765		
Tewkesbury Borough Council		0		
Total	1500	1321		

12.5. Significant progress has already been made on meeting the need to student housing in Cheltenham and Gloucester. The remaining requirement for the JCS period at the time of writing is 179 bed spaces. It is expected that the remaining bed spaces will come forward through windfall development over the plan period.

POLICY HM1: STUDENT ACCOMMODATION

The Council will work with local higher education establishments and student housing providers to facilitate the delivery of bespoke student accommodation at appropriate locations. The Council expects proposals for student accommodation to demonstrate that they support educational establishments within the Borough. Housing provision for students should be located in accessible locations close to public transport corridors and local services and facilities.

The Council will support proposals that:

1. Provide a high quality living environment which includes a range of unit sizes and layouts.
2. Ensure that facilities will be well managed and that there will be no detriment to local amenity or unreasonable harm caused to nearby residents or the surrounding area.
3. Demonstrate that the facility is suitable for year round occupation and that it has long term sustainability and adaptability.

This policy contributes towards achieving the Cheltenham Plan Vision: Theme A – objectives c, d, e, g and i

ELDERLY CARE PROVISION

- 12.6. Whilst sheltered housing schemes, particularly those providing minor nursing care or assistance with basic household chores, can help to bridge the gap between older people living independently in their own homes and their requiring constant care and attention, increasing old age and infirmity may eventually lead to the decision that a residential or nursing home may be the best solution for the individual. The increasing proportion of older people in the population has led to an increase in the demand for such homes.

POLICY HM2: ELDERLY CARE PROVISION

Housing choice for older people and supported and special needs housing proposals for older people should focus on the provision of high specification care-ready accommodation. The Council will support proposals that:

1. Help to meet an identified need.
2. Demonstrate that they would not have a harmful impact on the character and amenities of the surrounding area.
3. Are accessible to local shops and easily accessible by public transport.

A proportion of a scheme providing elderly care, defined by either C3 or C2 Use Class, or for supported or special needs housing will normally be required to contribute to affordable housing need. Schemes should demonstrate adequate external amenity space to provide a high quality and safe external living environment for residents, including areas for sitting, socializing, gardening and active leisure pursuits.

Proposals for specialist elderly care, including dementia care accommodation, should provide adequate communal facilities including accommodation for essential staff on site and should reflect current best practice in the design of such specialist accommodation.

This policy contributes towards achieving the Cheltenham Plan Vision: Theme A – objectives a, b, c, d, e, g and i; Theme C - objective d.

- 12.7. Where proposals for elderly care provision form part of a larger development site masterplanning should give careful consideration to the needs of the elderly. Opportunities for an active and engaged lifestyle, as well as the creation of spaces for informal social interaction, should be provided.
- 12.8. The JCS identifies that older people accounted for 13% of the population within the JCS area in 2011 and that this proportion could increase to 20% by 2031. It is therefore essential that a proportion of new housing in the area should be suited to the needs of older people, including specialist accommodation such as nursing homes, retirement villages and care based housing including extra care.

12.9. The need for 1,456 C3 use retirement/sheltered market housing units and 1,011 C2 use extra care units have been addressed through the JCS OAN. However, through the examination process, the need for 1,558 C2 use non-specified 'residential institution' bed spaces was identified over and above the OAN for the plan period across the JCS area (Inspector's Interim Report May 2016, Examination Document 232). A significant number of these additional bed spaces, usually made up of care home and nursing home provision, have already been constructed or consented between 2011 and the adoption of the JCS, as set out in Table 6 below. The provision of the remaining need for C2 residential institution use bed spaces must be captured through the emerging Local Plans, divided between the three authorities.

Table 6: Additional C2 Bed Spaces				
	Requirement	Identified Supply (completions & consents)	Remaining Requirement	Remaining Requirement per annum
Gloucester City Council	1558	189	1034	80
Cheltenham Borough Council		269		
Tewkesbury Borough Council		66		
Total	1558	524		

12.10. Around a third of the overall need for this type of bed-spaces has been met at the time of writing. This indicates that over the course of the whole plan period windfall development is likely to meet the total need identified in the JCS.

12.11. There is a need for 126 units of this type within Cheltenham (JCS EXAM 224) so this has already been exceeded. However, in order to assist in the overall delivery across the JCS the Cheltenham Plan includes policy HM2.

THE LOSS OF RESIDENTIAL ACCOMMODATION

12.12. In the context of limited opportunities for housebuilding within the Borough, the retention, improvement and maintenance of the existing stock is vital. Older housing areas have well established communities and the retention of existing housing is often the best way of maintaining community identity. Houses in the town centre also play an important role in providing accommodation close to

many social, welfare and transport facilities, by contributing to the vitality and safety of the town centre, and by helping to reduce crime.

- 12.13. The greatest risks to the dwelling stock exist in the town centre and on its fringes where older terraced housing, much of it important to Cheltenham's historic character, suffers from problems of poor condition and high maintenance costs. Many older houses are still in good condition, however, and even where this is not the case, improvement can often be cheaper than demolition and new construction.

POLICY HM3: LOSS OF RESIDENTIAL ACCOMMODATION

Development involving the loss of residential accommodation through the change of use or demolition of existing housing will not be permitted, except where:

- a) continued residential use is undesirable because of environmental conditions; or
- b) there is evidence that the arrangement of the accommodation and its facilities are very poor and difficult to improve for residential use; or
- c) a change of use is necessary to ensure the retention or renovation of a building of architectural or historic interest; or
- d) the proposed use would be beneficial to the wider economy and the local community (note) and cannot suitably be accommodated on alternative sites.

This policy contributes towards achieving the Cheltenham Plan Vision: Theme A – objectives a and c; Theme B- objective a; Theme C - objectives a, d and f.

Note: Services and facilities which support the economy and the needs of local communities will be considered, these may include doctors' or dentists' surgeries, hotels, guest houses, nursing homes, residential institutions, playgroups, children's nurseries and other community facilities such as corner shops. Each case will be judged on its merits, taking into account its effect on the locality.

- 12.14. The erosion of areas which are essentially residential in character by commercial uses, except those ancillary to the residential uses, will be strongly resisted by the Council, especially within those parts of the Cheltenham (Central) Conservation Area just outside the town centre where pressures for change are greatest, and the quiet, residential environment could be seriously harmed by commercial activities. The following policy is applied to minimise the loss of existing dwellings.

AGRICULTURAL AND FORESTRY DWELLINGS

- 12.15. The Town and Country Planning (General Permitted Development) Order 2015, as amended, grants permission for a wide range of development associated with

agricultural uses of land on units of 5 ha or more. In certain cases, permission cannot be exercised unless the developer has applied for a determination from the Council as to whether approval will be required for specified details.

POLICY HM4: AGRICULTURAL AND FORESTRY DWELLINGS

Permission for new agricultural or forestry dwellings will be granted only where:

- a justified need to provide accommodation to enable farm or forestry workers to live near or at their place of work has been demonstrated; and
- the dwelling is of a size commensurate with, and suitably located to meet, the identified functional need and is well related to other farm buildings or other dwellings.

The Borough Council will limit by condition the occupation of that accommodation to a person solely or mainly working or last working in agriculture or in forestry, or a widow or widower of such a person, and to any resident dependants.

This policy contributes towards achieving the Cheltenham Plan Vision: Theme A –objective b; Theme C - objective b.

12.16. In making such a determination, the Council will take account of the effect of the development on the landscape and character of the area, archaeological features, listed buildings and wildlife, as well as the agricultural need of the farm. In the case of new agricultural buildings, the Council will also continue its policy of taking into account likely problems of noise, smell, effluent disposal and effect on the highways, in view of the proximity of the countryside to the urban area.

HOUSES IN MULTIPLE OCCUPATION

12.17. A house in multiple occupation (HMO) can be defined in simple terms as a shared residential property where a certain number of occupants are not related to each other and they share basic amenities such as kitchen areas and bathroom facilities.

12.18. For planning purposes, small HMOs fall within use class C4, which are defined as:

“small shared houses or flats occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom.”

12.19. Larger HMOs, occupied by more than six unrelated individuals, fall within the sui generis use class (meaning of their own kind). Planning permission has always been required for proposals for large HMOs (sui generis use), whether this be purpose built accommodation or the change of use of an existing property.

- 12.20. Whilst HMOs are an important type of housing, high concentrations can have a negative impact on the town's communities. These negative impacts can include increased noise nuisance, anti-social behaviour or unkempt gardens. Some parts of the Borough, especially those close to the University, are becoming home to a high number of HMOs which are causing problems for other residents.
- 12.21. The Government report Evidence Gathering – Housing in Multiple Occupation and Possible Planning Responses (CLG 2008) looks at the problems caused by high concentrations of HMOs and considers the current and potential mechanisms to address these problems. Within this report, the following issues are associated with high concentrations of HMOs:
- anti-social behaviour, noise and nuisance;
 - imbalanced and unsustainable communities;
 - negative impacts on the physical environment and streetscape;
 - pressures upon parking provision;
 - increased crime;
 - growth in private rented sector at the expenses of owner-occupation;
 - pressure upon local community facilities and;
 - restructuring of retail, commercial services and recreational facilities to suit the lifestyles of the predominant population.
- 12.22. A number of other local planning authorities have introduced policy measures in order to control the proliferation of HMOs in their areas. Analysis of the thresholds and percentage limits that other authorities have used to limit further HMOs in their areas has been undertaken to inform the selection of a policy approach for Cheltenham. The National HMO Lobby, a voluntary association of local community action groups which are concerned with the impacts of HMOs on their communities, has attempted to define what they view as a high concentration of HMOs, and the level above which new HMOs should be limited. The National HMO Lobby suggests that 10% of properties or 20% of the population is the 'tipping-point' for HMO-dominance in a neighbourhood. Whilst the HMO Lobby is an informal collection of community groups, it brings together evidence from over 50 locations around the country where there are perceived high concentrations of HMOs. Their research provides a good starting point to assess how to judge what constitutes a balanced community against Cheltenham's own specific housing needs.
- 12.23. Setting a percentage threshold in Cheltenham will implement this policy by limiting the number of HMOs in communities that already contain an above average concentration of HMOs, and will also control the growth of HMOs in other parts of

the Borough to prevent the displacement of the problem to other neighbourhoods.

- 12.24. Research carried out in 2016-2017 found that within the St. Paul's Ward there were 350 HMOs. This translates into approximately 12% of households in that ward.
- 12.25. The Council will keep other areas in the town at risk of high concentration of HMOs under review and will take action where necessary.

ARTICLE 4 DIRECTION

- 12.26. Local Planning Authorities are considering making a direction under Article 4(1) of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) so that change of use by permitted development must instead require planning permission.
- 12.27. A change of use from a use within class C3 (dwelling houses) to a use falling within Class C4 (houses in multiple occupation) has been permitted development since October 2010.
- 12.28. The introduction of an Article 4 Direction, which may be reviewed by the Secretary of State before coming into force, will remove this permitted development right and therefore, a change of use to a House in Multiple Occupation would require planning permission. The Council is considering issuing an Article 4 Direction to restrict HMO development in the St. Paul's Ward. This will be carried out in a separate but linked process to the Cheltenham Plan. Once in force, subject to specified statutory procedures and timescales, the formation of all new HMOs in St Pauls will be controlled. This will result in Policy HM5 applying to applications for all HMO's in St. Pauls.

HMOS IN ST. PAULS

POLICY HM5: HOUSES IN MULTIPLE OCCUPATION

Planning permission will be granted for proposals for use class C4 small Houses in Multiple Occupation or sui-generis large Houses in Multiple Occupation in the St. Pauls Ward, provided that (based on the results of a biennial survey undertaken by the Council):

- a) The proportion of HMO dwellings does not exceed 10% of all residential properties within a 100 metre radius of the application site; AND
- b) The granting of planning permission will not result in the creation of more than two adjacent properties in HMO use; AND
- c) The proposal does not have an adverse impact on the amenity of nearby properties by ensuring:
 - adequate provision for off street parking;
 - highway safety and ease of access for emergency vehicles;
 - regard is given to Secured by Design guidance, particularly relating to occupier security, as published by the Association of Chief Police Officers (ACPO)
 - sufficient provision for waste and recycling;
 - the proposal is in keeping with the character of the area.

In exceptional circumstances, within areas that have a very high concentration of HMOs, planning permission for HMO use may be granted where it can be demonstrated that there is no market demand for continued C3 occupation.

This policy contributes towards achieving the Cheltenham Plan Vision: Theme A – objectives b, c, d, g and i; Theme C - objective a.

- 12.29. Policy HM5 sets a threshold whereby planning permission for an HMO can only be given where the percentage of HMOs in the area does not exceed 10%.
- 12.30. The Council will use a radius approach around the application site to calculate the number of residential properties surrounding a proposal to apply a threshold limit, based on the results of a biennial (once every two years) survey of HMOs in the area undertaken by the Council. Using a fixed radius will be a clear way, to both applicants and Planning Officers dealing with the applications, to assess the percentage of HMOs in an area. Assessing the concentration of HMOs by street was considered as an alternative to using a fixed radius approach. However, as streets vary greatly in length and nature, with some only having residential properties on one side, and thus contain differing numbers of properties, it was considered that using the fixed radius was a more suitable and consistent approach. Using the ward boundaries to assess against the percentage threshold would offer too large an area to judge if an over concentration of HMOs has occurred in a local community.

- 12.31. The Council also considered assessing the number of HMOs within the search area at the point of each application, but this would unduly impede the planning application system and cause case officers to duplicate work in each case. Instead therefore, decisions will be based on the results of a biennial survey of HMOs in the St Paul's area undertaken by the Council. This survey will be available for publication on completion of each update.
- 12.32. The number of properties will be calculated using the Council's GIS (Geographic Information Systems) mapping software. Each property has a unique location point defined on the National Land and Property Gazetteer (NLPG) and the location point of the proposed HMO will be the centre of the 100m radius. The number of residential properties falling within the 100m radius of the proposed HMO will be assessed by totalling the location points falling within that defined radius. For properties that fall partly within the 100 metre radius, they will only be included if the location point, as depicted on the NLPG, falls within this buffer.
- 12.33. For the purpose of this approach, dwellings that are either within purpose built blocks of flats or within houses that have been sub-divided into separate flats are all counted as one single property, and only the first address point is counted. This will avoid counts becoming 'skewed' by a high proportion of flats in one small area, such as typically terraced streets, thus reducing the concentration of HMOs that are reported. When counting HMOs, properties that contain flats already in HMO use will only be counted as one HMO, irrespective of how many HMO flats are already in existence within the whole building. In instances where there are already several HMO flats within one dwelling, the effect of allowing further HMO uses will be assessed in relation to the impact it would have on the character of the area.
- 12.34. It is also important when assessing planning applications for HMO uses to ensure that further smaller concentrations, or clustering, of HMOs do not occur within the 10% threshold.
- 12.35. To achieve this, HMOs will **not** be permitted if the application property falls:
- adjacent to two existing HMO uses, or
 - between two existing HMO uses and would therefore result in more than two HMOs in a row within a street.

AMENDMENTS TO THE PRINCIPAL URBAN AREA

- 12.36. The Principal Urban Area (PUA) marks the limits of Cheltenham town, being the dividing line between built-up/urban areas (the settlement) and non-urban or rural areas (the countryside), to define where planning policies apply.

- 12.37. A settlement boundary can serve a number of related, but separate, purposes such as:
- creating an edge to existing development thereby encouraging consolidation;
 - helping to separate communities and therefore retain their individual identities; and
 - defining the logical boundary between areas with different features and purposes, e.g. between areas with environmental or landscape designations and those suitable for development.
- 12.38. There are a number of advantages of settlement boundaries:
- They provide an easy to understand tool that gives certainty for landowners, developers and community over where development is likely to be acceptable and where it is not.
 - They can direct development to the urban area and this can help increase the viability of local services, as well as encourage new ones to establish.
 - They ensure a plan-led and more controlled approach to future development, providing a firm basis for protecting the countryside from unnecessary encroachment.
 - They can allow a presumption in favour of development of sites that are too small to be identified as formal allocations in a local plan.
- 12.39. JCS Policy SP2 directs new development to existing urban areas and Strategic Allocations. In order to apply this policy in the best possible way it is necessary to have an up-to-date, accurate boundary for Cheltenham's urban area.
- 12.40. The PUA is an important designation which should be as up to date as possible if it is to remain as useful as possible. It is good practice to use the Cheltenham Plan process to undertake a review of anomalies. There have also been some instances of recent edge of settlement developments which fit within the built form of the town that should be included.
- 12.41. Boundaries have been redrawn to include sites where land has been developed or planning permission has been granted for development over the past few years. The circumstances of each development have been investigated to consider whether or not it is appropriate to include within a revised boundary.
- 12.42. Officers undertook a desktop survey using GIS mapping and aerial photography together with information from the monitoring of planning applications, permissions and developments to locate any anomalies and areas where new

development has taken place beyond the existing PUA. The circumstances of each development have been investigated to consider whether or not it is appropriate to include within a revised boundary.

- 12.43. Each alteration is listed in Appendix F with a map and a brief justification. They are also included on the Proposals Map.

Table 7: Alterations to the Principal Urban Area				
Ref	Location	Area (ha)	Addition / subtraction	Reason
1	Swindon Village Primary School	0.26	Addition	Inclusion of new school buildings
2	Jemaro, Hyde Lane GL51 9QN	0.2	Addition	Inclusion of building and the creation of consistent boundary
3	81a New Barn Lane	0.15	Addition	Inclusion of new dwelling and residential curtilage
4	49 & 51 Apple Orchard, Prestbury	0.09	Addition	Inclusion of residential gardens and creation of consistent boundary
5	Pilgrim Cottate, Lake Street, Prestbury	0.05	Addition	Inclusion of residential garden
6	Rear of Beechcroft, Bowbridge House	0.003	Addition	Minor amendment of boundary anomaly
7	3 The Orchards, Glenfall Way	0.19	Addition	Inclusion of residential building and garden
8	Balcarras School	0.26	Addition	Inclusion of new school buildings
9	Timbercombe Gate	0.32	Addition	Inclusion of new residential development

10	Timbercombe Cottage, Timbercombe Lane	0.12	Addition	Inclusion of residential garden
11	Meadow House, Gadshill Road	0.32	Addition	Inclusion of residential garden
12	The Richard Pate School	0.4	Addition	Minor amendments to more accurately conform to building dimensions
13	Pilford Court	0.31	Addition	Inclusion of new residential development
14	26 Pilford Road	0.02	Addition	Inclusion of residential garden
15	Cliff House, Leckhampton Hill & Highfield, Daisy Bank Road	1.11	Addition	Inclusion of residential gardens and creation of consistent boundary
16	17, 19 & The Sleepers, Merlin Way	0.18	Addition	Inclusion of new residential development
17	106 Frith Lodge, Shurdington Road	0.11	Addition	Inclusion of new residential development
18	4 & 5 The Spindles	0.08	Addition	Inclusion of new residential development
19	Old Farm Drive, Manor End & Manor Farm Drive	1.35	Addition	Inclusion of new residential development
20	Highfields, Cold Pool Lane	0.06	Addition	Inclusion of new residential development
21	The Hayloft, The Reddings	0.07	Addition	Inclusion of residential dwelling

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HOUSING MIX AND STANDARDS

22	Chestnuts Farm, Branch Road	0.04	Addition	Inclusion of existing farm buildings to form consistent boundary
23	Land south east of Imber, Undercliff Avenue	0.19	Subtraction	The land is not urban in character and forms part of the wider rural area

13. GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE

CONTEXT

- 13.1. As explained in the JCS (Policy SD13) Cheltenham has no known need for pitch provision for those who meet the definition of Gypsy, Traveller or Showpeople. However, policy SD13 requires that 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 must also be planned for.
- 13.2. The most recent evidence on housing need for the traveller community is contained within the Gloucestershire Gypsy and Traveller Accommodation Assessment, March 2017 (GTAA 2017). The report found that in Cheltenham there are two unknown households that may meet the planning definition of Gypsy and Traveller households. This translates into a need of up to three additional pitches for unknown households which is made up of two temporary pitches and a new household formation of one from the two households.
- 13.3. The need for three pitches arises from households where it is unknown whether they meet the definition of Gypsies, Travellers and Travelling Showpeople for planning purposes. Regardless of this lack of detail, as shown above, the JCS is clear that all housing need must be planned for. This includes those who may fall outside of the most recent definition of Gypsy or Traveller.
- 13.4. In partnership with other Gloucestershire local planning authorities, the Council has undertaken a 'call for sites' (on two occasions), where members of the community, developers and landowners were invited to submit sites they consider could be suitable for residential Gypsy, Traveller or Travelling Showpeople use. Through these exercises no sites have been identified as having potential for Gypsy, Traveller or Travelling Showpeople residential use. Only two sites were put forward as potential for such a use. One of these is the Castle Dream Stud site on Mill Lane and the other was farmland adjacent to that site.
- 13.5. The GTAA 2017 recognises that Castle Dream Stud is currently the only authorised Gypsy/ Traveller site within Cheltenham Borough, therefore it would not be possible for the occupiers of the site to move to other suitable accommodation within the Borough. Two of the three pitches that are required arise from the previous planning status of this site, being only a temporary permission. The third

pitch requirement comes from the potential need arising of any teenage children on site, or concealed households who may require a pitch of their own in the future. Therefore if this site were given planning permission for Gypsy residential use then this requirement would be fulfilled.

POLICY GT1: GYPSY, TRAVELLER AND TRAVELLING SHOW PEOPLE SITES

The following site which is shown on the Cheltenham Plan Proposals Map has been identified as the preferred location for accommodating the future needs of gypsies and travellers and is delineated on the plan below. The red lines on the plan mark the boundaries of the allocation and are part of this policy.

- Castle Dream Stud, Mill Lane – 3 pitches

The contents of Policy GT1 reflect the evidence bases of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy and the Cheltenham Plan.

This policy contributes towards achieving Cheltenham Plan Vision: Theme A – objective b.

- 13.6. The strategy used within the Cheltenham Plan is one which prioritises development within the urban area followed by undesignated areas outside of the current urban area and only looks to designated land as a last resort. The result is that no residential or employment land will be designated in the AONB or Green Belt. The same principle has been followed when determining how to meet our need for Gypsy and Traveller accommodation.
- 13.7. No sites within the urban area or undesignated rural area have been identified. Only one other site has been suggested within the AONB and this is adjacent to Castle Dream Stud and currently contains no structures.
- 13.8. National and local policy requires that development within the AONB should only be allowed where it conserves the character, landscape, scenic beauty, wildlife, cultural heritage and other special qualities of the AONB. Any harm caused to the AONB will attract significant weight in planning terms. On the other hand the Borough is required to meet its need for appropriate sites for accommodation. The lack of alternative sites, the direct connection between Castle Dream Stud and the identified need and the fact that the site has been occupied since 2011 (via temporary permission, most recently 17/00129/FUL) weigh heavily in favour of allocating the site.



Policy GT1: Castle Dream Stud, Mill Lane

1:2000



20 November 2017

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14. HEALTH AND ENVIRONMENTAL QUALITY

CONTEXT

- 14.1. The protection and enhancement of the environment is considered essential in helping to improve the health and wellbeing of Cheltenham. The wellbeing of the Borough's residents is a key consideration in all policy making and no less in the determination of planning applications.
- 14.2. Successful development management should be based on a clear understanding of the characteristics of the local area in terms of character, built form, architecture, heritage and landscape. Well-designed, attractive places improve the quality of life for all, minimising the opportunity for crime and the fear of crime and enhancing the environment. It also contributes to the development of safer, stronger and sustainable communities that can adapt to the challenges of climate change.

POLICY SL1: SAFE AND SUSTAINABLE LIVING

Development will only be permitted where it would:

- a) not cause unacceptable harm to the amenity of adjoining land users and living conditions in the locality (notes 1 & 2); and
- b) not, by nature of its size, location, layout or design, give rise to crime or the fear of crime nor endanger public safety; and
- c) make adequate provision for security and the prevention of crime and disorder including, where appropriate, the incorporation of counter-terrorism measures.
- d) accord with Policies SD4 and SD15 of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy and the principles of good design embodied within.
- e) where appropriate, take account of local models for building socially sustainable communities.

This policy contributes towards achieving the Cheltenham Plan Vision: Theme A – objectives c, d, g, h and i.

Note 1: In regard to daylighting, the Council will have regard to BSI British Standards Code of Practice 'BS 8206-2:2008 Lighting for Buildings', and the Building Research Establishment's publication 'Site layout planning for daylight and sunlight: a guide to good practice (2011).

Note 2: In determining privacy for residents, the Council will apply the following minimum distances:

- *21 metres between dwellings which face each other where both have windows with clear glazing.*
- *12 metres between dwellings which face each other where only one has windows with clear glazing.*

SAFE AND SUSTAINABLE COMMUNITIES

- 14.3. In order for our built surroundings to make a positive contribution towards our quality of life, they need to provide safe, attractive, long-term and liveable environments for the whole community.
- 14.4. In assessing the impacts of a development including any potential harm, the Council will have regard to matters including loss of daylight; loss of outlook; loss of privacy; and potential disturbance from noise, smells, dust, fumes, vibration, glare from artificial lighting, hours of operation, and traffic / travel patterns.
- 14.5. Whilst the above represent the most commonly encountered issues, the list is not exhaustive and other matters may also be relevant according to the circumstances. Further information can be found in the Council's SPG on Sustainable Buildings (2003) and the SPD on Residential Alterations and Extensions (2008).
- 14.6. The Council works with the police and other partners to ensure that necessary measures are put in place to ensure public safety and to tackle crime and the causes of crime. In relation to the safety of higher risk buildings and places, regard will be paid to the Home Office / DCLG publication *Crowded Places: The Planning System and Counter-Terrorism (2012)* in helping to determine an appropriate response to all relevant development proposals.
- 14.7. Whilst the above policy is designed to assist in creating a safer and more sustainable future, it is recognised that planning for economic and environmental sustainability alone cannot build a successful community. This can only be achieved through a matrix of formal and informal opportunities or supported activities that contribute to the concept of social sustainability. First and foremost, this entails understanding what people need from the places where they live and work. The Council will therefore, wherever possible, encourage appropriate models of social sustainability such as those set out in *'Welcome to the future – a local model for building socially sustainable communities (2016)* as a means of creating more holistic developments and more integrated communities.

MAJOR DEVELOPMENT PROPOSALS

- 14.8. Major planning applications will need to be accompanied by a Health Impact Assessment in accordance with JCS policy SD14. The applicant will also be required to submit supporting information to demonstrate how the proposed development positively contributes to health and wellbeing and particularly the 10 principles of Active Design developed by Sport England and supported by Public Health England.

15. TRANSPORT NETWORK

CONTEXT

- 15.1. Transport is fundamental to delivering change and helping develop the framework for place shaping. There are a number of significant projects currently moving forward which offer opportunities for strategic level thinking on transport. These include the delivery of two strategic allocations at West and North West Cheltenham including a 45ha cyber park, developing a vision for the town centre and delivery of phases 3 and 4 of the Cheltenham Transport Plan. However, it is also important to look at the function of our neighbourhoods and understand how to develop a clear strategy of connectivity which offers real options in terms of modal choice.
- 15.2. Generally the best-to-worst modes of transport for the environment are as follows:
- Walking and cycling
 - Ultra-low emission vehicles
 - Buses and trains (depending on fuel)
 - Motorcycles
 - Shared cars
 - Single-occupant cars
- 15.3. To reduce emissions from transport people need to either travel less, or change from modes towards the bottom of this list to modes higher up. Cheltenham is a well contained borough with high levels of self-containment (number of people that both live and work in the town), together with being relatively flat this offers real opportunities to significantly increase the propensity to choose transport modes other than the private car. Both with walking and cycling and public transport a key barrier is connectivity to key infrastructure e.g. train station, key employment areas, schools and retail areas and between neighbourhoods.
- 15.4. The County Council manages and maintains the local road network, supports non-commercial passenger transport services, and promotes safe and sustainable travel. The County Council is also responsible for the preparation of the Local Transport Plan (LTP) which represents the key strategy for the delivery of essential transport infrastructure to support the delivery of growth identified in the JCS.

- 15.5. Policy INF1 of the JCS sets out transport related requirements and expectations for development in the borough. Of particular note is part one of INF1 which ensures that all proposals improve and encourage access to more sustainable modes of travel. Policy SD3 also requires new development to prioritise movement by sustainable transport modes through design. These policies will form an important part of development proposals in the borough.
- 15.6. Whilst the majority of transport related policy is covered through plans and strategies other than the Cheltenham Plan, there are a number of topic areas where need for a more local level of response has been identified. The Cheltenham Plan has therefore introduced policies to address these areas having regard to the stance of higher order policy documents including national policy and the JCS. It is intended that the policies that follow provide clarity and certainty in the areas concerned.

SAFEGUARDING ROUTES FOR SUSTAINABLE TRANSPORT

- 15.7. As part of the drive towards sustainable transport, the Cheltenham Plan has considered the need to protect certain infrastructure where it has the potential to help deliver tangible benefits in future, be they social, environmental or economic. In this respect, the Plan will protect the route of the former Honeybourne rail line where it falls within the Borough boundary.
- 15.8. It has long been recognised that the route has potential for future use as a continuous sustainable transport corridor linking the population centres of Bishop's Cleeve, Cheltenham, Gloucester, and Quedgley. The aim of the following policy will therefore be to safeguard that part of the route that lies within the Cheltenham Borough boundary from development which might prejudice this potential.

POLICY TN1: PROTECTING THE ROUTE OF THE FORMER HONEYBOURNE RAIL LINE

The route of the former Honeybourne Rail Line is delineated on the Cheltenham Plan Proposals Map. Development proposals which would prejudice the future use of the route as continuous sustainable transport corridor will not be permitted.

Development proposals on the Honeybourne Line will also be subject to policy GI1.

This policy contributes towards achieving the Cheltenham Plan Vision: Theme A - objectives f and j; Theme B – objective d; Theme C – objectives a and e.

- 15.9. Sections of the redundant railway have already been brought back into beneficial use as a footpath and cycleway, and some of the route is operated as a heritage attraction by the Gloucestershire & Warwickshire Railway. The safeguarding

designation as shown on the Proposals Map includes these sections as well as those sections where proposals have yet to be implemented.

- 15.10. It is anticipated that in the interests of long-term, coherent planning, neighbouring councils will include similar safeguarding proposals for the route in their local plans. The result will be to provide a fully co-ordinated approach to strategic land management in order to secure economic and other benefits through improved access to key settlements.

TOWN CENTRE PARKING

- 15.11. The NPPF states that “Local authorities should seek to improve the quality of parking in town centres so that it is convenient, safe and secure, including appropriate provision for motorcycles”.
- 15.12. It is recognised that the availability of car parking has a major influence on the means of transport people choose for their journeys. Parking also takes up a large amount of space on-street, in off-street parks, and in development, where it can reduce densities.
- 15.13. In Cheltenham, demand for car parking space is at its highest in the town centre and future development / population growth across the Borough is likely to create further demand for parking space during the course of the plan period. However, it is recognised that the provision of additional facilities to meet this demand would likely cause further congestion on the highway network, reduce environmental quality and threaten to damage the town’s special fabric and character. Therefore, in order to deter traffic movements to and within the town centre, the Plan does not propose to accommodate additional demand, but rather to encourage the use of alternative forms of transport in accord with the recommendations and action plan of the Cheltenham Car Parking Strategy 2017-2031. Specifically, the Parking Strategy recommended that:
- On-street parking should focus on short stay parking;
 - Longer stay parking should take place off-street (in car parks);
 - Commuter parking should be discouraged; and
 - Commuter travel should be via alternative modes of transport.
- 15.14. The above recommendations are made in light of survey findings which indicate that commuters still use prime town centre spaces for long-stay parking whilst Park & Ride sites remain underutilised. The recommendations support the provisions of both the GCCC Local Transport Plan and the GCC draft Parking Strategy in seeking to:

- Encourage walking, cycling and public transport use through investment in services including Park and Ride (P&R);
- Introduce / maintain a pricing policy which ensures that long stay parking is always more expensive than bus travel or P&R;
- Link to wider planning policy which, where possible, allocates sites of a sufficient size to attract new public transport services.

POLICY TN2: LONG-STAY CAR PARKING

The provision of new long-stay car parking facilities specifically for public use in the Core Commercial Area, either permanent or temporary, will not be permitted except where need has been demonstrated.

This policy contributes towards achieving the Cheltenham Plan Vision: Theme A - objective g; Theme B – objective d.

- 15.15. It is the Council's aim to encourage commuters to use alternative modes of transport in order to achieve more sustainable travel patterns. To this end, the authority will be working with the County Council on accessing available funding streams and promoting sustainable transport initiatives wherever possible in future.
- 15.16. Achieving a shift to more sustainable transport modes will likely mean exploring the possibility for public transport improvements; further encouragement of walking and cycling through, for example, defining and protecting strategic walking and cycling routes (see Policy TN1); and the exploration of new opportunities for P&R in line with the aspirations of the Local Transport Plan. Where such initiatives have land-use planning implications, these will be supported subject to satisfying relevant policies in the Cheltenham Plan and / or the JCS.
- 15.17. In order to complement the above approach, the Council has already taken measures to reduce provision for public long-stay parking in the town centre in favour of short-stay parking instead. The intention has been to retain the overall number of spaces available but to ensure increased capacity for short stay use and a higher turnover of users, providing principally for short stay shoppers, visitors, essential business users, and drivers with disabilities.
- 15.18. Under Policy TN2, the Council will continue this approach and not grant permission for new permanent or temporary (off-street) long-stay car parks specifically for public use, except as part of a coordinated and comprehensive approach to provision.

- 15.19. In line with JCS policies SD3 and INF1 any new development, including for car parking, will require suitable access and parking for cycles in order to promote a shift to more sustainable modes of transport.

16. GREEN INFRASTRUCTURE

CONTEXT

- 16.1. One of Cheltenham's distinctive features is its green and open nature. The Council recognises the importance of green spaces and their connectivity in the town and to the surrounding countryside, and particularly the opportunities they provide for recreation and relaxation, contributing to the health and wellbeing of residents and visitors. In addition, green spaces add to the quality of the town's built and natural environment. The landscape of the town provides a green network of spaces and wildlife corridors which support a variety of trees, vegetation, and wildlife habitats, assisting in biodiversity conservation throughout the town, and, into the wider countryside.
- 16.2. The Council is proud of its parks, gardens and other green spaces and features. In recognition of this, the Council does not wish to see their loss through development, or their deterioration through poor management and lack of resources and funding. The Council will seek to protect existing open spaces within the town, enhance and improve their management to provide improved facilities for recreation and nature conservation, and provide new green features where appropriate. The Council will also encourage others to undertake the same.

GREEN SPACES

- 16.3. Green space is undeveloped land, not necessarily provided for formal recreation or public amenity, which makes a positive visual and environmental contribution to the town. Green space in the urban environment occurs in a variety of forms:
- a) public parks and ornamental gardens associated with, and intrinsic to, the setting and form of Cheltenham;
 - b) grounds of large houses, institutions, commercial and educational properties;
 - c) public and private playing fields;
 - d) incidental open spaces associated with the layout of planned housing (and industrial) estates;
 - e) children's play space in residential areas;
 - f) allotments;
 - g) private gardens;
 - h) Local Green Space and;
 - i) various other open spaces, including land incidental to the laying out of roads, footpaths and cycleways.

- 16.4. Green space in the urban environment has worth for its townscape, environmental, wildlife and recreational values. The NPPF (para 73) describes the contribution open spaces make to the health and well-being of communities. The Borough Council will take this into account when making development control decisions and formulating local plan policies.

TOWNSCAPE VALUE

- 16.5. 'Townscape' can be defined as the positive features of a place, which create a special identity for a given area. Primarily buildings and green spaces create this identity. These features are supported by other elements, such as materials, trees and street furniture, which may add to the character of the townscape. High quality townscape creates distinctive places within the public realm which are valued by the people that use them and contribute towards a sense of civic pride.

ENVIRONMENTAL VALUE

- 16.6. In addition to its visual importance, green space contributes to an urban environment in other ways. By creating lower densities of development it can reduce levels of activity in an area, thereby contributing to a more peaceful and relaxed ambience, a benefit equally important in commercial and residential areas.
- 16.7. Human life, health and well-being depend on a healthy natural environment. Vegetation contributes to the physical well-being of a town by absorbing carbon dioxide and releasing oxygen, so improving the quality of air. Acting as a baffle, it can also absorb and so reduce noise.

WILDLIFE VALUE

- 16.8. Green spaces are essential in providing habitats for a wide range of flora and fauna. Some green spaces, particularly the more extensive and relatively undisturbed grounds of large houses and non-residential properties, may also harbour legally protected species such as barn owls, badgers and bats. Green spaces are therefore of significance to nature conservation.

RECREATIONAL VALUE

- 16.9. Much public green space is provided primarily for public recreation use, but also has an amenity value. However, green spaces do not have to be large to be enjoyed. Other types of green space, which have been provided for their townscape value, can often also afford opportunities for informal recreation such as walking, kite flying and dog walking. All these spaces contribute to the health and well-being of the community. Policies protecting outdoor play space, and also

safeguarding amenity space with an incidental recreational value, are set out in the Social and Community Infrastructure chapter.

ECONOMIC VALUE

16.10. High quality parks and green spaces can be associated with adding economic value, by improving the quality of the townscape, assisting in urban regeneration and neighbourhood renewal projects, improving the attractiveness of locations for businesses, creating community enterprise and generating new employment.

SOCIAL VALUE

16.11. Access to urban green spaces can promote healthy living, wellbeing and education. Green spaces provide the community and visitors with opportunities for physical recreation and relaxation, and for social interaction.

LOCAL GREEN SPACE

16.12. The NPPF (para 76-78) makes provision for local communities to identify green areas of particular importance to those communities, where development will not be permitted except in very special circumstances. These Local Green Spaces (LGS) can be designated through a local plan or through neighbourhood plans. The LGS designation will be an addition to the current protections for green spaces set out in the Cheltenham Plan, JCS and Development on Garden Land & Infill Sites Supplementary Planning Document (SPD).

POLICY GI1: LOCAL GREEN SPACE

Development will not be permitted within a Local Green Space, designated either within the Cheltenham Plan, or an approved Neighbourhood Plan unless there are very special circumstances which outweigh the harm to the Local Green Space. Particular attention will be paid to the views of the local community in assessing any development proposals that affect a designated Local Green Space.

The sites listed in Table 8 are designated as Local Green Spaces within the Cheltenham Plan.

In accordance with Policy TN1 development proposals which would prejudice the future use of the Honeybourne Line as continuous sustainable transport corridor will not be permitted. Development within the Honeybourne Line Local Green Space which will facilitate its use as a sustainable transport corridor may constitute very special circumstances which outweigh harm.

In accordance with policy MD5 playing fields for the proposed secondary school in Leckhampton will be considered an appropriate use of Local Green Space subject to all other design and landscape policies.

This policy contributes to objectives Vision Theme C – objectives a, b, e and f.

- 16.13. In response to the introduction of the new Local Green Space designation outlined in the NPPF, Cheltenham Borough Council commissioned Gloucestershire Rural Community Council (GRCC) to work with parishes and community groups within the Borough on a Local Green Spaces Study. The aim of the work was to support communities to identify and analyse potential Local Green Spaces to be considered for designation through the emerging Cheltenham Plan.
- 16.14. Additional sites have been suggested by the community during the various consultation stages of the Cheltenham Plan. These have been considered alongside the original submissions from the LGS study.
- 16.15. The 2006 Local Plan contained a policy which safeguarded from development a number of public green spaces around the Borough which the Council owns. None of these sites have been developed since the policy was implemented and the policy remains popular and highly needed. The public green space policy was very much a forerunner of the LGS policy of the NPPF in that it gave locally valued open spaces strong protection against development. This protection should be maintained in the Cheltenham Plan but having one policy for these sites and another for new LGS sites would be confusing and inefficient. Therefore the former public green space sites are now also included in the LGS designation.

Table 8: Sites designated as Local Green Space

Site	Area (ha)	Rationale	Ref no.
Leckhampton Fields	39.31	The JCS Inspector discussed LGS at Leckhampton in her Preliminary Findings: “In my judgement, the evidence suggests that the NPPF criteria are met and LGS designation is justified.”	1

Site	Area (ha)	Rationale	Ref no.
Fairview Green	0.16	Highly valued site owned and managed by CBC. It is similar to several other Public Green Space sites but not designated. Currently has strong protection due to use and ownership but is also very special.	2
St Marks and Hesters Way Community Centre grounds	0.51	This site has a clear value to the local community for its recreational use. No objections to its designation were received in the Preferred Options consultation.	4
Lynworth Green	0.42	This site has a clear value to the local community for its recreational use and as a centre point for the area. No objections to its designation were received in the Preferred Options consultation.	5
Albemarle Orchard gardens	0.1	This site has a clear value to the local community for its recreational use and as a community space. No objections to its designation were received in the Preferred Options consultation.	6
Colesbourne Road and Redgrove Park	0.81	This site has a clear value to the local community for its recreational use. No objections to its designation were received in the Preferred Options consultation.	7

Site	Area (ha)	Rationale	Ref no.
North West Strategic Allocation	24.5	The JCS Inspector said, in her Final Report that, “the allocation at North West Cheltenham should ensure that a green buffer remains around Swindon village within which Local Green Space may be designated, the detailed boundaries of which are to be left to the forthcoming Cheltenham Local Plan.”	8
Victoria Cricket Ground	2.76	This site has a clear value to the local community for its recreational use. No objections to its designation were received in the Preferred Options consultation.	9
Ewens Farm Play Area		Highly valued site owned and managed by CBC. It is similar to several other Public Green Space sites but not designated. Currently has strong protection due to use and ownership but is also very special.	10
Harrington Drive		This site has a clear value to the local community for its recreational use. Although it is a fairly small green space it benefits from significant local value as demonstrated in the submitted LGS toolkit.	11
Clyde Crescent	2.79	Existing PGS site in 2006 Local Plan	12
Clarence Square	0.68	Existing PGS site in 2006 Local Plan	13
Whaddon Road	2.23	Existing PGS site in 2006 Local Plan	14

Site	Area (ha)	Rationale	Ref no.
Pittville Circus	0.37	Existing PGS site in 2006 Local Plan	15
Fiddlers Green Lane	1.21	Existing PGS site in 2006 Local Plan	16
Pittville Crescent (south)	0.25	Existing PGS site in 2006 Local Plan	17
Pittville Crescent (north)	0.25	Existing PGS site in 2006 Local Plan	18
Wellington Square	0.72	Existing PGS site in 2006 Local Plan	19
Pittville Park/South	1.79	Existing PGS site in 2006 Local Plan	20
George Readings Way	0.79	Existing PGS site in 2006 Local Plan with amendments to take into account LGS toolkit	21
Pittville Park	4.28	Existing PGS site in 2006 Local Plan	22
St. Peters/Chelt Walk	5.13	Existing PGS site in 2006 Local Plan	23
Caernarvon Road	1.16	Existing PGS site in 2006 Local Plan	24
Pittville Park/North	4.75	Existing PGS site in 2006 Local Plan	25
Sandford Road	0.17	Existing PGS site in 2006 Local Plan	26
Bath Road	0.20	Existing PGS site in 2006 Local Plan	27
Montpellier Gardens	3.71	Existing PGS site in 2006 Local Plan	28
Lansdown Crescent	0.81	Existing PGS site in 2006 Local Plan	29
Queen Elizabeth II	4.23	Existing PGS site in 2006 Local Plan	30

Site	Area (ha)	Rationale	Ref no.
Swindon Village	8.89	Existing PGS site in 2006 Local Plan	31
Welch Road	7.51	Existing PGS site in 2006 Local Plan	32
Henley Road (south east)	0.22	Existing PGS site in 2006 Local Plan	33
Henley Road (north west)	0.59	Existing PGS site in 2006 Local Plan	34
King George V	11.70	Existing PGS site in 2006 Local Plan	35
Coronation Square	0.45	Existing PGS site in 2006 Local Plan	36
Hesters Way Park	4.02	Existing PGS site in 2006 Local Plan	37
Horsefair Street	1.07	Existing PGS site in 2006 Local Plan	38
Prior's Farm	5.30	Existing PGS site in 2006 Local Plan	39
Benhall (west)	3.57	Existing PGS site in 2006 Local Plan	40
Benhall (east)	6.23	Existing PGS site in 2006 Local Plan	41
Reddings Road	1.08	Existing PGS site in 2006 Local Plan	42
Hatherley Park	3.11	Existing PGS site in 2006 Local Plan	43
Burrows Field	6.34	Existing PGS site in 2006 Local Plan	44
Naunton Park	5.02	Existing PGS site in 2006 Local Plan	45
Sandford Mill Cox's Meadow	5.46	Existing PGS site in 2006 Local Plan	46

Site	Area (ha)	Rationale	Ref no.
King William Drive	0.34	Existing PGS site in 2006 Local Plan	47
Charlton Park	0.94	Existing PGS site in 2006 Local Plan	48
Cirencester Road	1.33	Existing PGS site in 2006 Local Plan	49
Sandy Lane	5.91	Existing PGS site in 2006 Local Plan	50
The Beeches	5.75	Existing PGS site in 2006 Local Plan	51
Sandford Park	2.87	Existing PGS site in 2006 Local Plan	52
Arle Court	1.73	Existing PGS site in 2006 Local Plan	53
Weavers Field	3.29	Existing PGS site in 2006 Local Plan	54
Imperial Gardens	1.16	Existing PGS site in 2006 Local Plan	55
Fernleigh Green	0.27	Existing PGS site in 2006 Local Plan	56
Glenlea Park	0.78	Existing PGS site in 2006 Local Plan	57
Cheriton Park	1.21	Existing PGS site in 2006 Local Plan	58
Manor Park	0.56	Existing PGS site in 2006 Local Plan	59
Up Hatherlry Green	0.18	Existing PGS site in 2006 Local Plan	60
Hatherley Court	1.01	Existing PGS site in 2006 Local Plan	61
Holmer Park/Greatfield Park	1.95	Existing PGS site in 2006 Local Plan	62

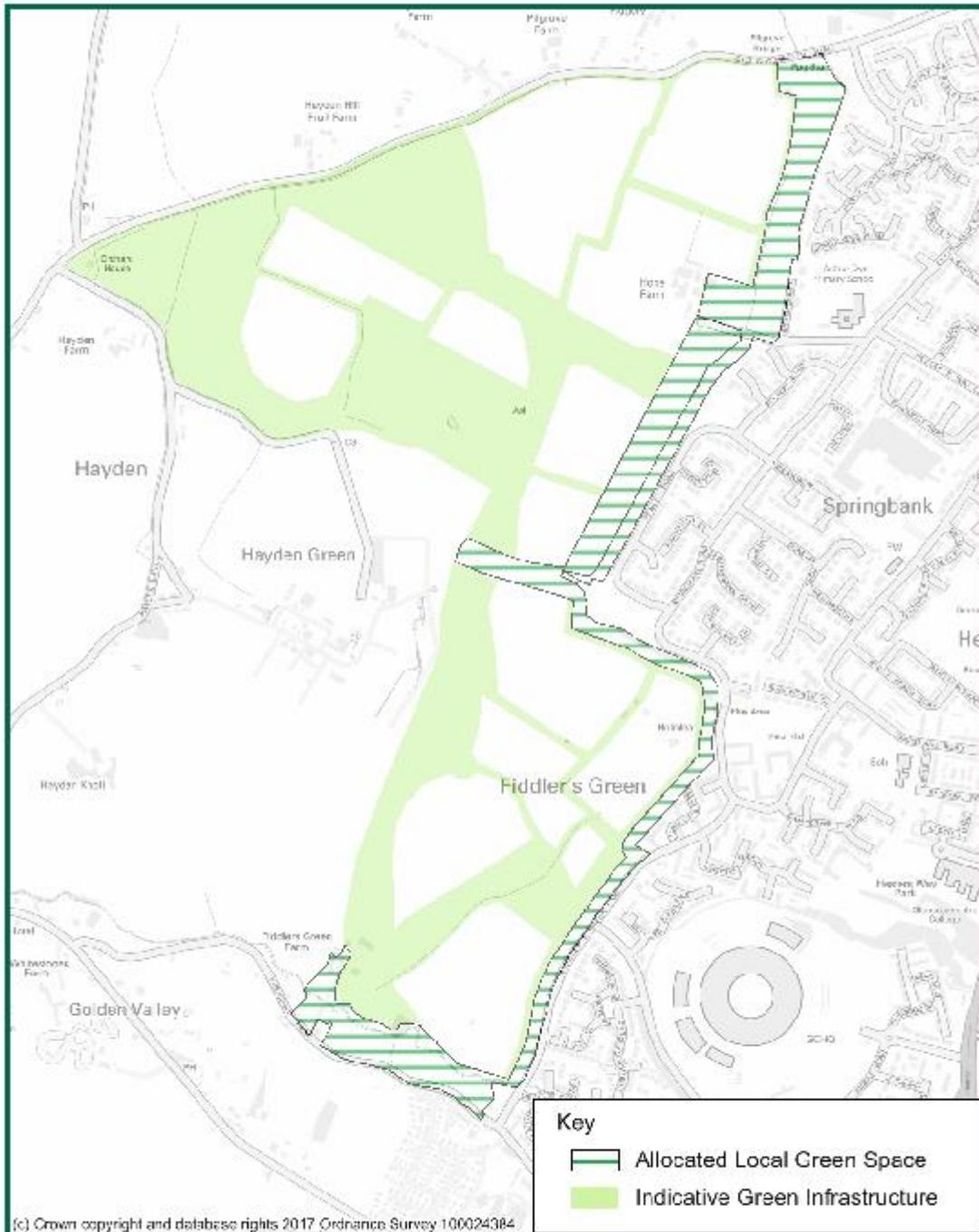
Site	Area (ha)	Rationale	Ref no.
Chelt Walk (Jessops Avenue)	1.02	Existing PGS site in 2006 Local Plan	63
Pilgrove Way (west)	0.82	Existing PGS site in 2006 Local Plan with amendments to take into account LGS toolkit	64
Pilgrove Way (east)	0.29	Existing PGS site in 2006 Local Plan with amendments to take into account LGS toolkit	65
Oxford and Priory Garden (south-east)	0.06	Existing PGS site in 2006 Local Plan	66
Oxford and Priory Garden (north west)	0.09	Existing PGS site in 2006 Local Plan	67
Honeybourne Line (central)	0.81	Existing PGS site in 2006 Local Plan	68
Honeybourne Line (south)	2.47	Existing PGS site in 2006 Local Plan	69
Honeybourne Line (north)	4.18	Existing PGS site in 2006 Local Plan	70
Winston Churchill Gardens	1.20	Existing PGS site in 2006 Local Plan	71
The Lanes (north)	0.60	Existing PGS site in 2006 Local Plan	72
The Lanes (south)	0.20	Existing PGS site in 2006 Local Plan	73
Sandford Park	1.93	Existing PGS site in 2006 Local Plan	74
Pilley Bridge (south-east)	1.44	Existing PGS site in 2006 Local Plan	75

Site	Area (ha)	Rationale	Ref no.
Pilley Bridge (north-west)	0.85	Existing PGS site in 2006 Local Plan	76
Chelt Walk (St. Georges Road)	0.17	Existing PGS site in 2006 Local Plan	77
Chelt Walk (Honeybourne Way)	0.51	Existing PGS site in 2006 Local Plan	78
Long Mynd Avenue	0.32	Existing PGS site in 2006 Local Plan	79
Land off Springbank Road	0.37	Existing PGS site in 2006 Local Plan with amendments to take into account LGS toolkit	80
Summerfield Close	0.03	Existing PGS site in 2006 Local Plan	81
Pittville Park	19.51	Existing PGS site in 2006 Local Plan	82
Jasmin Way/Justica Way Open Space	0.35	The site is owned and managed by CBC. It is very similar to several other Public Green Space sites but was not designated in the 2006 Local Plan. It is included here for consistency.	83
Campion Park Open Space	0.94	The site is owned and managed by CBC. It is very similar to several other Public Green Space sites but was not designated in the 2006 Local Plan. It is included here for consistency.	84

Site	Area (ha)	Rationale	Ref no.
Berkeley Garden	0.11	The site is owned and managed by CBC. It is very similar to several other Public Green Space sites but was not designated in the 2006 Local Plan. It is included here for consistency.	85
West Cheltenham Strategic Allocation	18.25	Policy A7 of the JCS requires the West Cheltenham Strategic Allocation site to include Local Green Space as part of a network of green infrastructure.	86

LOCAL GREEN SPACE WITHIN JCS STRATEGIC ALLOCATIONS

- 16.16. The JCS allocated two Strategic Sites on the edge of Cheltenham, North West and West. Through the JCS examination process it was determined that both of these sites justify the inclusion of Local Green Space. The designation of the LGS was considered a matter for the Cheltenham Plan or Neighbourhood Plans. These areas can be seen on the site maps below.
- 16.17. The local green space area and indicative layout for Leckhampton is also shown, as this is a large site which was considered by the JCS, even though it is not a JCS allocation. The LGS for Leckhampton, the housing and school allocation is made by the Cheltenham Plan.



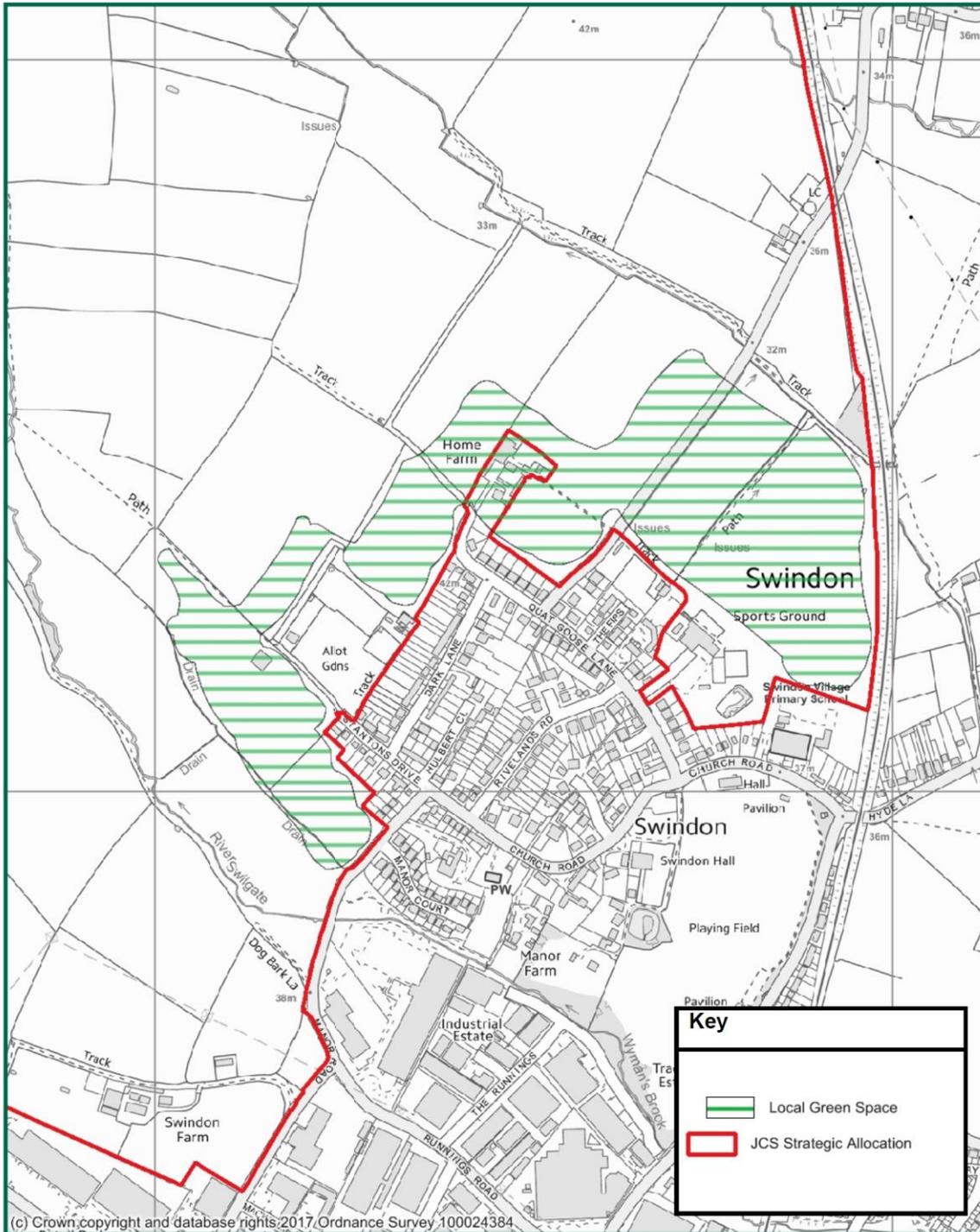
Indicative Site Layout West Cheltenham

1:10000



28 November 2017

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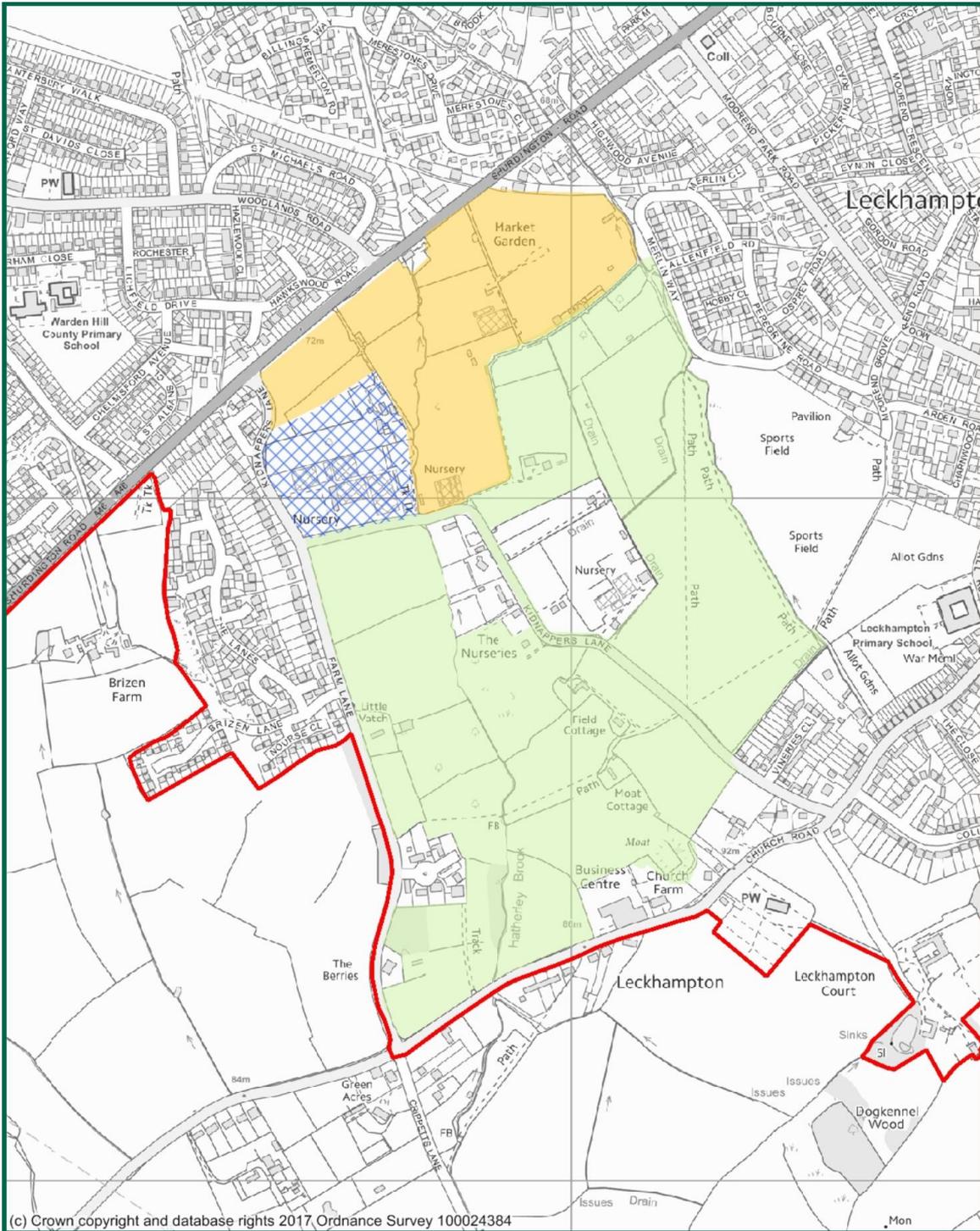
Local Green Space North West Cheltenham

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30 November 2017

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21 November 2017

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The Leckhampton LGS allocation is shown above in green, the Borough boundary in red, the housing allocation in yellow and the indicative location for the school in hatched blue. Kidnappers Lane (the road itself) will not however be designated as part of the LGS.

TREES

16.18. Aerial photographs of Cheltenham illustrate how wooded the town is. Trees populate most green spaces and are also found alongside many of the town's roads; avenues of roadside trees were a notable characteristic of Regency Cheltenham which has continued until today, supported by new planting which has sought to perpetuate the Regency style. In addition to being a pleasant feature in the townscape and providing valuable wildlife habitats, trees have other environmental benefits. They help to reduce the effects of climate change, by absorbing carbon dioxide and other airborne pollutants. On a local scale trees provide shade and shelter, reduce noise and stress, encourage inward investment and add economic value.

THE PROTECTION, REPLACEMENT AND MANAGEMENT OF TREES

16.19. Conservation Area status and Tree Preservation Orders (TPO) are the Borough Council's only sources of legal protection for trees on private land. No work can be carried out to protected trees without first notifying the local planning authority, and in the case of trees subject of a Preservation Order, express consent is required. Violation of protected status can be liable to legal action and a fine. Felling licences, issued by the Forestry Commission, may also be needed for felling specific volumes of trees.

POLICY GI2: PROTECTION AND REPLACEMENT OF TREES

The Borough Council will resist the unnecessary (note 1) felling of trees on private land, and will make Tree Preservation Orders in appropriate cases.

For protected trees (note 2), the Council will require:

- any tree which has to be felled to be replaced, where practicable (note 3); and
- pruning, where it is necessary, to be undertaken so as to minimise harm to the health or general appearance of a tree and to be in conformity with British Standard for Tree Work (BS3998, 2010).

In cases where trees are not protected by a Tree Preservation Order or by being in a Conservation Area, but contribute to the townscape and character of the town, the Council will consider including such trees in a Tree Preservation Order.

This policy contributes to objectives Vision Theme C – objectives a, b, e and f.

Note 1: The felling of a tree will be necessary only where it is dead, unsafe, or causing unacceptable harm to buildings or infrastructure. The Borough Council will seek to retain trees that are dead or dying where they contribute to the conservation of biodiversity, where they pose no harm to public safety or property.

Note 2: Protected trees are those within Conservation Areas or subject to Tree Preservation Orders.

Note 3: The legitimate felling of protected trees with TPOs will require replacement planting. The Council will determine the location, size and species of the replacement.

TREES AND DEVELOPMENT

- 16.21. Trees enhance development by softening the appearance of built structures and creating a sense of maturity.
- 16.22. Development sites often contain trees, which can be incorporated into development schemes. Such trees together with new planting can add economic as well as environmental value to development.
- 16.23. Section 197 of the Town and Country Planning Act 1990 states: 'it shall be the duty of the local planning authority to ensure, whenever it is appropriate, that in granting planning permission for any development adequate provision is made by the imposition of conditions for the preservation or planting of trees.'
- 16.24. The Council will also seek possibilities for new planting, both in conjunction with development, and separately. Priority areas will include the Conservation Areas and the principal approach roads. The Council will also encourage the planting and replacement of trees on private land. The Borough Council has prepared a leaflet containing information and advice regarding trees on development sites. The leaflet provides guidance to developers on an appropriate approach to existing trees on and within the sphere of influence of a site as well as planting, both in terms of species and contribution to urban design.
- 16.25. Whether trees are to be retained or planted in conjunction with new development, careful planning will be required at each stage until the development is complete, so as to avoid problems as the trees grow. The process must begin with a survey of existing trees and services in accordance with BS5837 (2012) '*Trees in relation to design, demolition and construction - Recommendations*' to provide a basis for deciding which trees might be suitable for retention. This must include not only trees within the site but any adjoining or overhanging trees which might be affected by the development.
- 16.26. In planning for the retention or planting of trees, the age, health, habitat and potential height and spread of each species should be taken into account. The positioning of trees or buildings in relation to each other should be carefully considered to ensure that a tree will not be harmed or require harmful pruning as it grows, or cause damage to buildings or services. The effect of trees on views and

on daylight and sunlight as well as other influences and perceived nuisance as well as benefits to buildings must be considered.

- 16.27. All planning applications, where applicable, must include details and methodology for tree protection from the commencement of development to completion, to ensure that trees are not damaged by construction work.
- 16.28. It is assumed that unless there are overriding circumstances new trees of appropriate species should be planted within a development site. Where this is not practicable (for instance because of the size or shape of a site or the disposition of underground services), the Council will encourage developers to fund the planting of trees close to the site. Where appropriate the Council will require developers to submit a detailed landscape assessment, including provision for new tree planting.

POLICY GI3: TREES AND DEVELOPMENT

Development which would cause permanent damage to trees of high value (note 1) will not be permitted.

The following may be required in conjunction with development:

- a) the retention of existing trees (note 2); and
- b) the planting of new trees (note 3); and
- c) measures adequate to ensure the protection of trees during construction works.

This policy contributes to objectives Vision Theme C – objectives a, b and e

Note 1: 'High value' means a sound and healthy tree with at least 10 years of safe and useful life remaining which makes a significant contribution to the character or appearance of a site or locality.

Note 2: The preservation and planting of trees in conjunction with development should take account of the guidance in British Standard 5837: 2012.

Note 3: Where appropriate the Council will seek agreement from developers for the planting of new trees offsite.

17. SOCIAL AND COMMUNITY INFRASTRUCTURE

CONTEXT

- 17.1. Most people wish to live in an area that has a strong sense of community where neighbourhoods thrive and where good quality infrastructure allows that to happen. Without such infrastructure settlements can struggle to be cohesive and vibrant communities and it can be difficult to create / maintain a sense of place, a sense of belonging and a tangible identity.
- 17.2. Changes in population and demographics present challenges and opportunities and the Council recognises the importance of maintaining community cohesion and sustainability in an ever changing society. Ultimately, bringing people together and providing sufficient opportunities for social activity contributes to quality of life, health and well-being.
- 17.3. Policy INF4 of the JCS provides a robust framework for assessing all relevant development proposals with a view to protecting and enhancing community facility provision across the JCS area. Policy SD4 of the JCS complements INF4 in terms of the emphasis that needs to be placed on good design in achieving sustainable development.
- 17.4. The following policies are designed to complement the strategic framework provided by the JCS and offer a Cheltenham-specific policy response in key areas.

POLICY CI1: SECURING COMMUNITY INFRASTRUCTURE BENEFITS

Development proposals will only be permitted where adequate community infrastructure capacity exists or where additional capacity is capable of being provided as part of the development without unacceptable impacts on people or the environment. In order to secure community infrastructure improvements, the Council will employ planning obligations as necessary and appropriate. Obligations may relate to:

- affordable housing
- green infrastructure including open space
- suitably designed and located play, recreation, sport and leisure facilities
- education provision
- broadband infrastructure provision
- highway works, traffic management measures, pedestrian and cycling

improvements, public transport enhancements and improved access for the disabled

- improvements to the public realm
- health and well-being facilities
- safety and security measures
- flood risk management measures
- environmental protection and enhancement
- climate change mitigation / adaption
- cultural and heritage protection and enhancement
- public art

This policy contributes towards achieving the Cheltenham Plan Vision: Theme A - all objectives; Theme B – objectives d, f and h; Theme C – all objectives.

- 17.5. For the purposes of the Cheltenham Plan, community infrastructure is considered to be the structural elements that provide the framework for supporting the activities of society. It can be represented by any of the categories stipulated in Policy CI1 above but may also extend into other topic areas.

EXISTING INFRASTRUCTURE PROVISION

- 17.6. The implications of infrastructure capacity were considered as part of the early stages of the plan preparation process and led to the emergence of a preferred option from a number of different alternatives. In taking forward the spatial elements of the preferred option, the Cheltenham Plan has made land allocations in accord with the level of existing infrastructure provision or where additional capacity can realistically be provided as part of new development.

NEW OR IMPROVED INFRASTRUCTURE

- 17.7. As new developments often place a burden on existing infrastructure and create requirements for new or enhanced facilities, it is only appropriate that a proportion of the increased value of the land should be returned to the community through appropriate benefits. These benefits should be reasonably related in scale and kind to the development proposed. This does not mean however, that they have to be restricted to the site itself. For example, where a major development is proposed, this may have a significant impact on potential traffic generation. It may therefore be appropriate for the developer to contribute to investment in public transport enhancement or highway improvements.

PLANNING OBLIGATIONS

- 17.8. Planning obligations will be sought where they satisfy the criteria set out in Paragraph 122 of the *Community Infrastructure Levy Regulations (2010)*.

- 17.9. The Council will be responsible for stating the precise level and nature of its requirements as part of the planning application process with obligations only being sought where there is an identified need. The level of provision required will be based on recognised formulae and benchmarks for example, design standards for outdoor sport and play space. However, when finalising Section 106 agreements, the Council will need to strike a balance amongst competing causes and ensure that development remains viable and the strategy of the Plan is realised.
- 17.10. Whilst at the time of writing, the Council widely uses planning obligations as part of the development process it is acknowledged that in future, strategic infrastructure will be funded by the community infrastructure levy (CIL) if it is included on the Council's "Regulation 123 list".

PROTECTING COMMUNITY FACILITIES

- 17.11. Community Facility is a broad subject heading that could apply to schools/ training centres, libraries, sports and leisure facilities, health care provision, social services, emergency services, places of worship, post offices, pubs / micro-pubs, corner and village shops, public halls and any other facility that fulfils a role of serving the community. Some of these facilities are under the ownership and control of the public sector (including the local authority), whilst others are entirely private concerns.
- 17.12. Matters of lifestyle, mobility and demography all have the potential to influence demand for community facilities. The Council continues to monitor the level of provision and will protect and support the enhancement of facilities in accord with JCS Policy INF4, helping to facilitate improvements where possible and appropriate, to ensure that no section of the local community is excluded from having access to basic facilities and services – the overall aim being to create and maintain vibrant and sustainable places to live, work and spend leisure time.
- 17.13. There may also be a need to secure a contribution towards the provision of additional facilities as part of certain larger, new housing developments, especially in areas where that development places additional burden on existing community infrastructure (see Policy CI1). The Council is particularly focussed on encouraging the provision of charging points for electric vehicles in new residential development as a means of creating more sustainable transport solutions through improved community infrastructure.
- 17.14. Proposals for the provision of new corner and village shops should also accord with the Borough's retail hierarchy.

- 17.15. Some types of community facility can also be regarded as part of the Borough's network of green infrastructure. Reference to JCS Policy INF3 (Green Infrastructure) may also therefore be necessary.

POLICY CI2: SPORTS AND OPEN SPACE PROVISION IN NEW RESIDENTIAL DEVELOPMENT

The Council will expect new development to contribute towards meeting local standards in respect of the provision of:

- i. Open Space
- ii. Playing pitches
- iii. Built sports facilities

On-site provision, off-site provision or a financial contribution may be sought in accord with the assessment processes defined in the Social, Sport and Open Spaces Study – Developer Contributions Toolkit (2017).

This policy contributes towards achieving the Cheltenham Plan Vision: Theme A - objective f; Theme C - objectives c and e.

- 17.16. For any planning application that qualifies for a developer contribution, the Social, Sport and Open Spaces Study – Developer Contributions Toolkit (2017) includes multi-stage assessment processes that the Council will follow in order to inform the potential additional demand that a new housing development generates.
- 17.17. Separate assessment processes relate to open space, playing pitches and built sports facilities. Any contribution sought from a specific development will be based on an individually tailored approach to that development using the robust evidence bases provided as part of the Social, Sport and Open Spaces Study. This will help to clearly justify the needs arising from the development and how they are to be met.
- 17.18. As part of the process of assessing additional demand, the Council will have regard to the local standards that are set out in the papers pertaining to each of the three relevant categories. These are:
- i. The Open Space Standards Paper
 - ii. The Playing Pitch Strategy
 - iii. The Indoor Sport and Leisure Facility Strategy
- 17.19. Work on the three papers was undertaken as part of a co-ordinated and comprehensive study which the Council commissioned to help inform the policy direction of the Cheltenham Plan.

- 17.20. For the purposes of the Cheltenham Plan, open space is defined as parks and gardens; natural and semi-natural greenspaces; amenity greenspace; provision for children and young people; allotments; cemeteries; disused churchyards or other burial grounds; and civic spaces including market squares and other hard surfaced areas designed for pedestrians. The Open Space Standards Paper has evaluated the contribution that each of these site typologies makes to overall open space provision across the Borough with specific reference to quantity, quality and accessibility. It is clear that whilst in some areas, provision is adequate or good, there are other areas where improvements remain necessary.
- 17.21. In coming to a view on whether developer contributions towards open space provision are required as part of a planning application (and if so, what type of contribution is needed), the Council will have regard to the 5-stage assessment process outlined in the Developer Contributions Toolkit.

PLAYING PITCHES

- 17.22. The three main aims of the Playing Pitch Strategy reflect Sport England themes:
- 1) To **protect** the existing supply of playing pitches where it is needed for meeting current and future needs
 - 2) To **enhance** playing fields, pitches and ancillary facilities through improving quality and management of sites
 - 3) To **provide** new playing pitches where there is current or future demand to do so
- 17.23. The Playing Pitch Strategy concludes that in regard to the existing position for all pitch sports, demand is either being met (with some small levels of spare capacity) or there is an identified shortfall. Future projections show that for sports with existing identified shortfalls, those shortfalls will likely be exacerbated in future years.
- 17.24. In reaching a view on whether developer contributions towards playing pitch provision are required as part of a planning application (and if so, what type of contribution is needed), the Council will have regard to the assessment process outlined in the Developer Contributions Toolkit. For playing pitch provision this entails undertaking an 8-stage process which includes consideration of matters of design and future maintenance.

INDOOR SPORT AND LEISURE

- 17.25. On deciding whether developer contributions towards indoor sport and leisure provision are required as part of a planning application (and if so, what type of contribution is needed), the Council will have regard to the assessment process outlined in the Developer Contributions Toolkit. For indoor sport and leisure provision this entails undertaking a 6-stage process which includes consideration of the design principles for any new provision and the likelihood for strategic pooling of financial contributions to assist in delivery.
- 17.26. In respect of the above, the Council will consider how the cumulative effect of housing developments within Cheltenham (and, as necessary, the wider cross border /JCS area) should make a contribution to strategic sport and leisure facilities. This may be to provide new provision or to enhance existing provision so that it can accommodate increased demand.
- 17.27. In order to calculate the contribution from each housing development into a strategic leisure facility fund the Council will use the Sport England Sports Facilities Calculator.

POLICY CI3: STATUTORY AND NON-STATUTORY ALLOTMENTS

Development involving the loss of allotment land will only be permitted where:

- a) the site is not included in the allotment strategy as a resource meeting an existing or future need, and where it can be demonstrated that there is no need for alternative outdoor recreational space; or
- b) the site does not provide a significant or environmental contribution to the town; or
- c) appropriate compensatory provision is made in agreement with the Borough Council and the Cheltenham and District Allotment Holders Association which meets the following requirements:
 - the new site is in the vicinity and would serve the same catchment as the existing site; and
 - the new site provides approximately the same number and size of plots as those in active use at the existing site; and
 - the soil is of a high quality and suitable for cultivation; and
 - the new site is accessible to pedestrians, cyclists and vehicles.

This policy contributes towards achieving the Cheltenham Plan Vision: Theme A – objective f; Theme C- objective f.

- 17.28. Allotments provide a wide range of benefits to the community including low cost food production; opportunities for recreation; green / amenity space; and biodiversity habitat.

- 17.29. There are currently 18 allotment sites across the Borough. These are:
- All Saints
 - Alma Road
 - Asquith Road
 - Blacksmiths Lane, Prestbury
 - Croft (3 sites)
 - Hall Road
 - Hatherley Road
 - Hayden Road
 - Midwinter
 - Reddings Road
 - Ryeworth
 - Severn Road
 - Swindon Village
 - Terry Ashdown
 - Warden Hill
 - Windsor Street
- 17.30. Demand for allotments has been variable over time, but in recent years, with increasing amounts of leisure time, an appreciation of the benefits of home-grown produce and the trend towards smaller gardens in new housing development, demand has remained consistently strong and is likely to do so over the Plan period. However, demand and supply of allotments are not always perfectly matched and it is recognised there may be areas of under and over supply.
- 17.31. The Council considers that genuinely redundant allotment land should not be automatically disposed of for development. The first preference is for that land to be made available for an alternative community / recreational activity especially where it has considerable townscape value as a green space. Redundant allotment plots are often appropriate for use as “leisure gardens” which can be rented for private use.
- 17.32. The designation of new and alternative / compensatory sites requires the satisfaction of a number of criteria as set out in Policy CI3. Amongst these are accessibility for pedestrians, cyclists and vehicles, and appropriate physical conditions (including soil quality).

POLICY CI4: BROADBAND PROVISION

The Council will require new residential and commercial development to be served by a high speed, reliable broadband connection.

Exceptions may only be made where applicants are able to demonstrate through consultation with broadband infrastructure providers that this would not be possible, practical or economically viable. In such cases an equivalent developer contribution towards off site works will be sought which could enable greater access in the future

This policy contributes towards achieving the Cheltenham Plan Vision: Theme A - objective d.

- 17.33. From 2017, EU Legislation specifies that new build and major renovations of buildings will need to be high speed ready, with exemptions only allowed for historic buildings, holiday homes and projects where the cost to do this would be disproportionate
- 17.34. Paragraph 42 of the NPPF recognises the importance of infrastructure in delivering sustainable economic growth, and states that ‘the development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services’. Paragraph 43 goes on to say that ‘in preparing Local Plans, local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband’.
- 17.35. Whilst Cheltenham is currently better connected than many parts of the UK, there are still homes and businesses which still do not receive a 36Mbps UK average service. The Council wishes to ensure super-fast and fibre broadband is available to all properties at the earliest opportunity and will work with the telecommunications industry to help maximise access to superfast broadband, wireless hotspots and improved mobile signals for all residents and businesses, assisting them in delivering their investment plans and working to address any infrastructure deficiencies or barriers.
- 17.36. In terms of new build, Policy CI4 introduces a specific expectation to reflect the above stance. In developments where installing high speed broadband is proven not to be possible, practical or economically viable (e.g. on smaller sites), the Council will seek developer contributions in accord with Policy CI1 to undertake off-site works that would help facilitate greater access to broadband in future.

SOCIAL SUSTAINABILITY

- 17.37. The Cheltenham Plan recognises that creating successful and sustainable communities requires more than just providing new homes and hard infrastructure; planning practitioners must also understand what people need from the places where they live and work and the extent to which those needs are being met. Consequently, there is a need to combine the design of the physical realm with the design of the social world and a resulting requirement to support social and cultural life, social amenities and systems for citizen engagement together with space for people and places to evolve.
- 17.38. *The Design for Social Sustainability* (2011) sets out a framework for considering the social dimensions of community life and how these can be translated into practical initiatives. The Council has regard to this framework in policy formulation and decision making and will also encourage developers to take account of its principles in planning social infrastructure and community facilities in future.
- 17.39. At a more local level, *The Social, Sport and Open Spaces Study* (2017) undertaken as part of the Cheltenham Plan preparation process contains a number of pertinent questions that can be asked in order to assess the particular needs of a community and to ascertain whether there are resulting requirements to make specific community provisions in the interests of long term sustainability. For example:
- are there enough schools, libraries, community buildings, GPs, retail facilities to meet resident needs?
 - where do people go to meet other residents?
 - what are the physical links to neighbouring areas, are they porous or rigid?
 - how will these be affected by new development - will there be capacity issues?
- 17.40. The concept is further highlighted through specific examples in *'Welcome to the Future – A local model for building socially sustainable communities'* which was endorsed by the Council in 2016 as a model for social sustainability. The approach is being followed in master planning key sites across the Borough with the aim of supporting people to live in strong, safe and healthy communities.
- 17.41. Gloucestershire Rural Community Council (GRCC) was commissioned by the Council in 2016 to support communities in Cheltenham by considering their aspirations and presenting these in a comprehensive report with a view to informing the Cheltenham Plan. The work was funded by Department of Communities and Local Government (DCLG) as part of its Neighbourhood Planning and Local Planning Service Redesign and Capacity Building Pilot Programme.

- 17.42. *The Cheltenham Engaging Communities Project* enabled a variety of community groups to understand the process of community-led planning and provided them with practical, pragmatic support as they explored key ideas, issues and aspirations for consideration by the Council. The Project built on previous partnership working between GRCC and Cheltenham Borough communities in 2014-2015 which resulted in evidence gathering and recommendations by communities for designation of Local Green Spaces across the Borough.
- 17.43. Key outputs from the project included the compilation of detailed profiles for each community which the Council and its partners will be able to use in planning for the future. Whilst many of the community characteristics were already known, the project facilitated a more comprehensive consideration of the strengths, weaknesses, opportunities and threats in each area.
- 17.44. Finally, consultation is currently being undertaken as part of the *West Cheltenham Estates Regeneration Project*. Lessons learned from this project will be used to further develop approaches to promoting and delivering socially sustainable communities.

18. RENEWABLE ENERGY AND LOW CARBON ENERGY DEVELOPMENT

CONTEXT

- 18.1. JCS Policy INF5 provides the framework for assessing the majority of renewable energy proposals that may come forward. However, as the NPPF requires that wind energy developments should be considered at district level, it falls to the Cheltenham Plan to consider this particular matter further.

WIND ENERGY GENERATION

- 18.2. The Renewable Energy Study produced for Gloucestershire County Council by ENTEC in 2010 considered there to be very little potential for renewable energy generation from wind given the built up nature of the district. For this reason, no further work has been undertaken on this matter since the ENTEC study.
- 18.3. As a result, and given the unlikelihood of wind energy proposals coming forward in future, the Cheltenham Plan does not include a policy that relates to wind energy generation, nor does it seek to identify sites that may be suitable for harnessing the wind energy resource.

19. DELIVERY, MONITORING AND REVIEW

19.1. Monitoring of the Cheltenham Plan is an important process which will indicate how effective the policies contained in the plan are in terms of meeting the Vision and Objectives. It also highlights if policies are not working and could be a key trigger for plan review. Therefore, it is important that identified indicators which will be measured are obtainable, measurable and the data is produced on a regular basis. The Joint Core Strategy already details a thorough monitoring framework, many of the indicators of which will allow the objectives identified in the Cheltenham Plan to be monitored also, therefore a number of the objectives for the Cheltenham Plan refer to indicators identified in the Joint Core Strategy. Monitoring will be reported through the annual monitoring report.

DELIVERY

19.2. The Joint Core Strategy's Delivery, Monitoring and Review chapter encompasses analysis of monitoring of residential development and calculation of five year housing land supply, which will continue to be covered at that strategic level. However, part of the housing supply will be met through the Cheltenham Plan, which will be discussed in greater detail here than that covered in the Joint Core Strategy. It should be noted that this is a subset of the main trajectory produced in the Joint Core Strategy and as such should be read in conjunction with the Joint Core Strategy Delivery, Monitoring and Review chapter.

Table 9 gives an overview of the housing requirements and supply for Cheltenham Borough

Table 9: Summary of Requirement and Supply for Cheltenham Borough	
Housing requirement for Cheltenham Borough (2011-2031) (As agreed in the Joint Core Strategy)	10,917 dwellings
Total Supply of housing (2011-2031)	11,030 dwellings (The Cheltenham Plan allocates 113 dwellings more than the requirement to allow for flexibility in site delivery over the plan period)
Supply being met through strategic allocations (allocated in the Joint Core Strategy)	5,385 dwellings

Supply being met through allocations in the Cheltenham Plan	1,236 dwellings
Unplanned supply (being met through windfall)	4,409 dwellings
5 Year Housing Land Supply (correct at date of publication)	5.6 years
Employment requirement (2011-2031) (As identified in the Joint Core Strategy)	1ha
Employment supply from new allocations in the Cheltenham Plan	7.35 ha (total site area)

- 19.3. Through the Cheltenham Plan a number of sites are allocated for housing development following discussions with developers and land owners and consideration of constraints affecting each site, a trajectory has been produced to show when development is expected to be delivered on each site. The same overarching principals have been applied to this trajectory as used when calculating five year housing land supply in the Joint Core Strategy.
- 19.4. 34% of the supply being delivered through the Cheltenham Plan allocations already has consent, and therefore development on these sites must be started within 3 or 5 years from the date of permission, these sites are shown in table 10 highlighted in blue, the other sites are allocations which have yet to receive planning permission.

DELIVERY, MONITORING AND REVIEW

Table 10: Trajectory of Cheltenham Plan allocations																	
Ref.	Site Name	Permission Reference	Net Capacity	17-18	18-19	19-20	20-21	21-22	22-23	23-24	24-25	25-26	26-27	27-28	28-29	29-30	30-31
	57-59 Winchcombe Street (Axiom)	15/02268/FUL	11		11												
	Rivershill House St Georges Road	15/00451/FUL	45		25	20											
	Pittville School Albert Road	15/01163/OUT	58					25	33								
MD2	North Place Car Park and Portland Street	12/01612/FUL	143						25	50	50	18					
	Springbank Shopping Centre	16/02303/FUL	34		15	15	4										
	Land at Lansdown Road	17/00337/FUL	67			25	25	17									
	196 -102 Prestbury Road	17/01266/FUL	30			15	15										
	Premiere Products, Bouncers Lane	17/00929/OUT	58			25	25	8									
HD1	Christ College Site B		70						25	45							
HD3	Former Monkscroft Primary School		60				25	25	10								
HD4	Bouncer's Lane (not consented)		20						20								
HD5	Land off Oakhurst Rise		25								25						
HD6	Land off Stone Crescent		20				20										
HD7	Land off Brockhampton Lane		20							10	10						

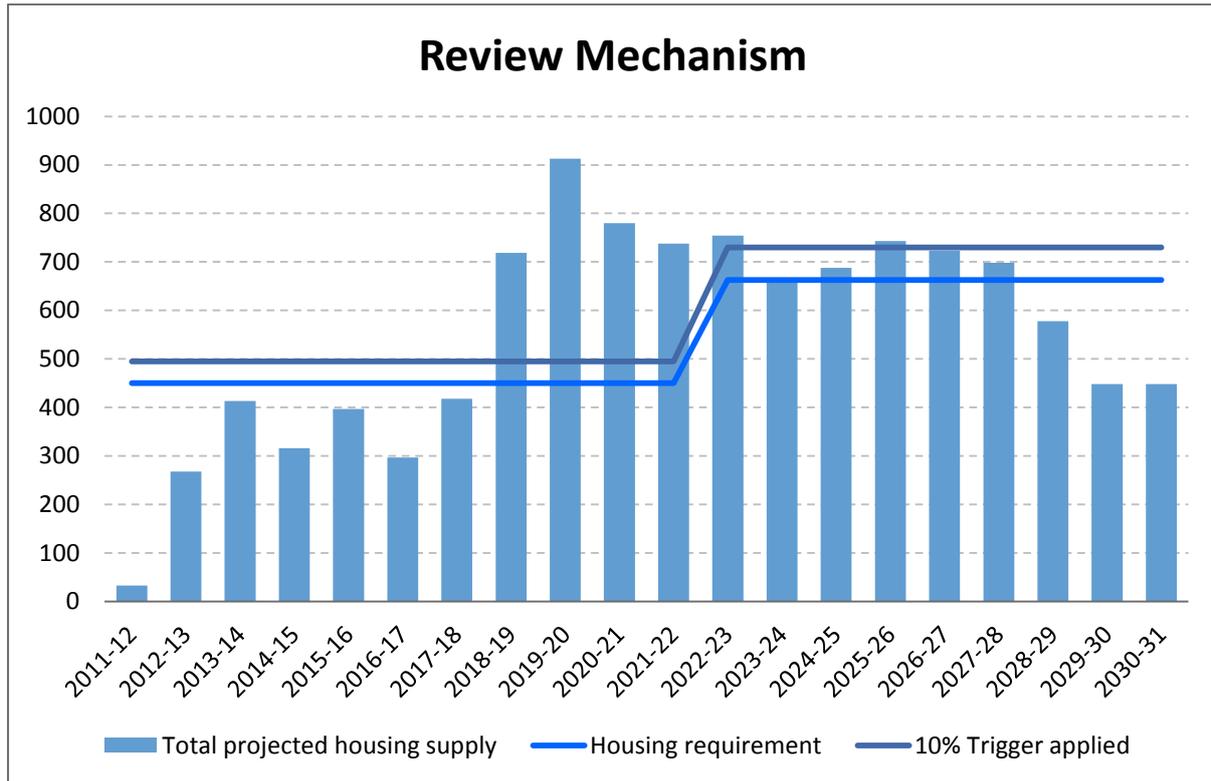
DELIVERY, MONITORING AND REVIEW

HD8	Priors Farm Fields		50										25	25			
MD5	Leckhampton (Previously Strategic Allocation)		250		30	50	60	60	50								
HD10	Old Gloucester Road		175				25	50	50	50							
MD1	Lansdown Industrial Estate		100									25	50	25			
	Total		1246	0	81	150	199	185	213	155	85	43	75	50	0	0	0

HOUSING SUPPLY REVIEW MECHANISM

19.5. The Joint Core Strategy details a housing supply review mechanism which will be applied to the Joint Core Strategy area as a whole. The trigger mechanism (10%) will be applied to the Cheltenham trajectory, of which the allocations in the Cheltenham Plan are part of.

Figure 1: Review Mechanism



EMPLOYMENT

19.6. Three out of the four employment allocations made in Policy EM1 have planning permission, the details of which are provided in table 11.

Table 11: Employment land allocations			
Ref	Allocation	Planning Ref.	Description
E1	Land south of Jessop Avenue	16/01417/FUL	Erection of six storey B1 office development with A2/A3 use at ground floor together with roof plant, external cycle and bin stores, on-site parking and parking canopy structures
E2	Land south of Hatherley Lane	12/01488/FUL	Erection of 3,384sq.m of office headquarters floorspace (use class B1) (Proposal is an amendment to unit 9 of planning permission 10/00252/FUL)

E3	Land north-west of Grovefield Way	16/02208/FUL	Hybrid application seeking detailed planning permission for a 5,034 sq.m of commercial office space (Use Class B1), 502 sq.m day nursery (Use Class D1), 1,742 sq.m supermarket food retail unit (Class A1), a 204 sq.m coffee shop retail unit and drive-thru (Use Classes A1 and A3), with associated parking, landscaping and infrastructure works. Outline planning permission sought for the erection of 8,034 sq.m of commercial office space (Use Class B1), together with associated car parking, landscaping and infrastructure works, with all matters reserved (except access).
E4	Chelt Walk, Town Centre	No application	

MONITORING

19.7. In order to ensure effective monitoring of the Cheltenham Plan a monitoring framework has been produced and is detailed in the following three tables. Unlike the Joint Core Strategy there is a table which contains the objectives under each Vision theme rather than each objective.

THEME A

19.8. The following objectives help to achieve vision theme A which focusses on communities:

Cheltenham is a place where people live in strong, safe, healthy, well-served and well-connected communities

Objective	Indicator	Target	Source	Period
a) Recognise the local distinctiveness of Cheltenham's various neighbourhoods and deliver regeneration where appropriate	Population make up of each ward	No target	Gloucestershire Inform	Annually
	Indices of multiple deprivation	No target	Gloucestershire Inform	Annually
	Crime rates reported by ward	No sharp rise in wards which have allocations in	Gloucestershire Inform	Annually

<p>b) Ensure provision of sufficient housing land and other opportunities for residential development that meets the needs of the current and future population of the Borough</p>	<p>Covered by monitoring indicators contained in the Joint Core Strategy for Strategic Objective 8: Delivering a wide choice of quality homes</p>			
<p>c) Understand what people need from the places where they live and work to help create socially sustainable communities using locally specific models</p>	<p>Claimants for mental and behavioural disorders per 1,000 working age population</p>	<p>No target</p>	<p>Public Health England Profiles</p>	<p>To be reported in the annual Monitoring Report</p>
	<p>Amount of dedicated community space in large scale new developments</p>	<p>Increased amount of community space in areas of growth</p>	<p>Internal monitoring of planning applications</p>	<p>To be reported in the annual Monitoring Report</p>
	<p>A balanced mix of tenure on large scale new developments so that a balanced community is more likely to be reflected.</p>	<p>No target</p>	<p>Internal monitoring of planning applications</p>	<p>To be reported in the annual Monitoring Report</p>
<p>d) Ensure that new communities are integrated with neighbouring communities to promote cohesion and reduce social isolation</p>	<p>Number of Neighbourhood Forums/ Plans that are created in areas of growth</p>	<p>Increased number of neighbourhood plans in production</p>	<p>Internal monitoring</p>	<p>Annually</p>
	<p>Data from HMO counts</p>	<p>To have a balanced community</p>	<p>Internal monitoring</p>	<p>Tri-annually</p>
<p>e) Enable investment in schools, healthcare</p>	<p>Covered by monitoring indicators contained in the Joint Core Strategy for Strategic Objective 9: Promoting healthy communities</p>			

and other community facilities and meeting places in order to support new and existing communities				
f) Increase opportunities for sport and active leisure, particularly in areas of under-provision	Covered by monitoring indicators contained in the Joint Core Strategy for Strategic Objective 9: Promoting healthy communities			
g) Design places that are accessible to all and where barriers to walking and cycling are removed so that active travel and public transport are the default choices	Covered by monitoring indicators contained in the Joint Core Strategy for Strategic Objective 9: Promoting healthy communities			
h) Support a network of neighbourhood centres that provide an appropriate range of local amenities to support sustainable communities	Number of new neighbourhood centres created	Each community to be supported by a local neighbourhood centre	Internal monitoring	Annually
i) Ensure that new development protects public safety and amenity and creates environments that contribute to reducing crime and fear of crime	Crime rates reported by ward	No significant increases in crimes reported from wards with allocations located within	Gloucestershire Inform	To be reported in the annual Monitoring Report

j) Improve health outcomes by promoting and prioritising active travel	Covered by monitoring indicators contained in the Joint Core Strategy for Strategic Objective 7: Promoting sustainable transport
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THEME B

19.9. The following objectives help to achieve vision theme B which focusses primarily on the economy:

Cheltenham is a place with a prosperous and enterprising economy where education and employment opportunities are increasing and diversifying, where businesses choose to invest, and where the benefits are felt by all.

Table 13: Theme B objectives				
Text	Indicator	Target	Source	Period
a) Ensure provision of sufficient employment land and other opportunities for economic development to attract new businesses and to enable existing businesses to grow and develop within Cheltenham	Covered by monitoring indicators contained in the Joint Core Strategy for Strategic Objective 1: Building a strong and competitive urban economy			
b) Promote the development of adaptable and flexible employment space within Cheltenham so that sites and buildings can be re-used with minimal environmental impact	Covered by monitoring indicators contained in the Joint Core Strategy for Strategic Objective 1: Building a strong and competitive urban economy			
c) Assist in developing and maintaining an attractive retail offer in the town centre and other designated centres	Provisions to made within the Joint Core Strategy Retail Review and Covered by monitoring indicators contained in the Joint Core Strategy for Strategic Objective 2: Ensuring vitality of town centres			

d) Deliver a range of sustainable transport choices through appropriate infrastructure improvements including better cross-town and local links, prioritised junctions, and improved public transport	Covered by monitoring indicators contained in the Joint Core Strategy for Strategic Objective 7: Promoting sustainable transport			
e) Encourage knowledge-intensive services businesses in high value sectors	Covered by monitoring indicators contained in the Joint Core Strategy for Strategic Objective 1: Building a strong and competitive urban economy			
f) Support development of Cheltenham's educational facilities to ensure that the young people have access to a wide range of opportunities	New Schools/ educational facilities being delivered	Where a need is identified for that need to be met in full, either through new facilities or extending existing facilities	Annual Employment Monitoring	Annually
	Number of playing fields lost to other land uses	Maintain overall provision of playing fields	Annual Employment Monitoring	Annually
	Number of school places available	No target	Gloucestershire County Council	Annually

THEME C

19.10. The following objectives help to achieve vision theme C which focusses on both the built and natural environment:

Cheltenham is a place where the quality and sustainability of our cultural assets and natural and built environment are valued and recognised locally, nationally and internationally and tourists choose to visit and return to.

Table 14: Theme C objectives				
Text	Indicator	Target	Source	Period

a) Conserve and enhance Cheltenham's architectural, townscape and landscape heritage, particularly within the town's conservation areas	Number of planning applications that are within a conservation area	No target	Annual housing monitoring	Annually
b) Conserve, manage and enhance Cheltenham's natural environment and biodiversity	Covered by monitoring indicators contained in the Joint Core Strategy for Strategic Objective 4: Conserving and enhancing the environment			
c) Support development of Cheltenham's sporting, cultural, arts and tourism infrastructure (including public art) to ensure that the Borough maintains its reputation as a cultural destination and continues to be an attractive place to visit	Contributions towards sporting, cultural and arts infrastructure	No target	Authority monitoring Report	Annually
	Number of visitors to sporting venue- Leisure@	Increased use of Leisure@	Authority monitoring report	Annually
	Number of visitors to the Cheltenham festivals	No target	Internal monitoring	Annually
d) Address the challenge of climate change, ensuring that development meets high design and sustainability standards and is built to be adaptable over the long term	Covered by monitoring indicators contained in the Joint Core Strategy for Strategic Objective 6: Meeting the challenges of climate change			
e) Improve pedestrian and cycle permeability throughout the town by creating a network of convenient routes which include multifunctional green spaces that link with the wider countryside, attractive and safe streets	Covered by monitoring indicators contained in the Joint Core Strategy for Strategic Objective 7: Promoting sustainable transport			

and spaces, and measures which reduce the visual and environmental impact of vehicular traffic				
f) Support provision, maintenance and continued investment in a high quality public and private realm, including formal and informal green spaces and private gardens that contribute to local amenity and wildlife biodiversity	Covered by monitoring indicators contained in the Joint Core Strategy for Strategic Objective 4: Conserving and enhancing the environment			
g) Manage and reduce the risk of flooding within the Borough	Number of applications with an associated flood risk.	Planning applications should not be permitted in the worst flood risk areas (Flood zones 1 and 2).	Authority Monitoring Report and Annual monitoring reports	Annually

20. POLICIES SUPERSEDED BY THE JOINT CORE STRATEGY & CHELTENHAM PLAN

Upon adoption, the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) supersedes policies from the saved Cheltenham Borough Local Plan (2006) as set out in the table below. Where 2006 Cheltenham Borough Local Plan policies are not superseded by the JCS, they will remain saved, but will be superseded by the new Cheltenham Plan upon its adoption. The only exception is Retail which will be subject to the Joint Core Strategy Retail review.

Table 15: Superseded 2006 Local Plan policies		
2006 Local Plan policy ref.	Policy heading	Status
CP 1	Sustainable Development	Superseded by JCS policies SD10, SD14
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	Superseded by JCS policies SD3, 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	Superseded by JCS policies INF4, INF6, INF7
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	Superseded by JCS policy SD4
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	Superseded by JCS policies SD4, SD9, INF3
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	Superseded by JCS policies SD4, SD6, SD7
CO 2	Development within or affecting the AONB	Superseded by JCS policy SD7
CO 3	Rebuilding or Replacement of Buildings in the AONB	Superseded by JCS policy SD7
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	Superseded by JCS policy SD5
CO 6	Development in the Green Belt	Superseded by JCS policies SD5, SD10

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	Superseded by JCS policy SD5
CO 10	Agricultural Land	Superseded by JCS policy SD14
CO 11	Agricultural and Forestry Dwellings	Local Plan Policy to be saved beyond the adoption of the JCS
CO 12	Farm Diversification Projects	Superseded by JCS policies SD1, SD4, SD6,
CO 13	Conversion of Rural Buildings	Local Plan Policy to be saved beyond the adoption of the JCS
CO 14	Development Abutting the Countryside	Superseded by JCS policies SD4, SD6
NE 1	Habitats of Legally Protected Species	Superseded by JCS policy SD9
NE 2	Designated Nature Conservation Sites	Superseded by JCS policy SD9
NE 3	Biodiversity and Geodiversity of Local Importance	Superseded by JCS policy SD9
NE 4	Contaminated Land	Superseded by JCS policy SD14
EM 1	Employment Uses	Superseded by JCS policy SD1
EM 2	Safeguarding of Employment Land	Local Plan Policy to be saved beyond the adoption of the JCS

HS 1	Housing Development	Superseded by JCS policy SD10
HS 2	Housing Density	Superseded by JCS policy SD10
HS 3	Sub-Division of Existing Dwellings	Superseded by JCS policy SD4
HS 4	Affordable Housing	Superseded by JCS policy SD12
HS 5	Mixed Communities	Superseded by JCS policy SD11
HS 6	Elderly Persons Housing	Superseded by JCS policy SD11
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	Superseded by JCS policy INF4
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	Superseded by JCS policy INF4
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	Superseded by JCS policies SD5, SD6, SD7
RC 12	Golf Courses	Superseded by JCS policies SD5, SD6, SD7
RC 13	Public Rights of Way in the Countryside	Superseded by JCS policy INF3
UI 1	Development in Flood Zones	Superseded by JCS policy INF2
UI 2	Development and Flooding	Superseded by JCS policy INF2
UI 3	Sustainable Drainage Systems	Superseded by JCS policy INF2
UI 4	Maintenance Strips for Watercourses	Local Plan Policy to be saved beyond the adoption of the JCS
UI 5	Culverting of Watercourses	Superseded by JCS policy INF2
UI 6	Development Near Sewage Treatment Works	Superseded by JCS policies SD5, SD14
UI 7	Renewable Energy	Superseded by JCS policies SD3, SD4, SD14, INF5
UI 8	Telecommunications Installations	Superseded by JCS policies INF6, SD14
TP 1	Development and Highway Safety	Superseded by JCS policies SD4, INF1
TP 2	Highway Standards	Superseded by JCS policies SD4, INF1
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

20.1. The following Retail policies will remain saved and in use after the adoption of the Cheltenham Plan:

RT 1	Location of Retail Development	Local Plan Policy to be saved beyond the adoption of the JCS and Cheltenham Plan
RT 2	Retail Development in the Core Commercial Area	Local Plan Policy to be saved beyond the adoption of the JCS and Cheltenham Plan
RT 3	Non-A1 Uses in Primary Shopping Frontages	Local Plan Policy to be saved beyond the adoption of the JCS and Cheltenham Plan
RT 4	Retail Development in Local Shopping Centres	Local Plan Policy to be saved beyond the adoption of the JCS and Cheltenham Plan
RT 5	Non A1 Uses In Local Shopping Centres	Local Plan Policy to be saved beyond the adoption of the JCS and Cheltenham Plan
RT 8	Individual Convenience Shops	Local Plan Policy to be saved beyond the adoption of the JCS and Cheltenham Plan
RT 9	Car Sales	Local Plan Policy to be saved beyond the adoption of the JCS and Cheltenham Plan
RT 10	Access to Upper Floors of Commercial Premises	Local Plan Policy to be saved beyond the adoption of the JCS and Cheltenham Plan

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The Cheltenham Plan

**INTEGRATED APPRAISAL
(Sustainability Appraisal; Strategic
Environmental Assessment; Health Impact
Assessment & Equality Impact
Assessment)**

November 2017

enfusion



Cheltenham Borough Council The Cheltenham Plan: Regulation 19

INTEGRATED APPRAISAL (IA) Sustainability Appraisal (SA); Strategic Environmental Assessment (SEA); Health Impact Assessment (HIA); Equality Impact Assessment (EqIA)

Habitats Regulations Assessment (HRA) Report
is available separately

Integrated Appraisal Report November 2017

<i>date:</i>	October 2016 Draft & Final v01 November 2017 Draft v01 & v02 Final	
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Non-Technical Summary (NTS)

This is the NTS of the Integrated (Sustainability) Report

1. This is the Non-Technical Summary of the Integrated (Sustainability) Appraisal Report documenting the processes of Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) within an Integrated Appraisal (IA) for the Cheltenham Plan. This summary is an integral part of the Integrated Appraisal Report that accompanies the Local Plan for public consultation in November to December 2017. It provides an outline of the IA process and findings, including how the IA has influenced the development of the plan, and in accordance with the requirements of the National Planning Policy Framework (NPPF), the European SEA Directive, and UK guidance on SA/SEA.

The Cheltenham Plan

2. The currently adopted Cheltenham Borough Local Plan was prepared to cover the period 1991-2011. It is being replaced to address requirements of the National Planning Policy Framework (2012), the progress of the Gloucester, Cheltenham & Tewkesbury (GCT) Joint Core Strategy (JCS), and changing local circumstances. The GCT JCS (plan period to 2031) provides the housing and employment needs for the Cheltenham Borough area including the strategic direction for development growth with strategic policies (Strategic, Core, Allocation, and Delivery). The Cheltenham Plan, covering the administrative area of Cheltenham Borough is part of a hierarchy of planning guidance, sitting underneath the higher level Joint Core Strategy and national planning guidance.
3. The GCT Joint Core Strategy includes land provided within the Cheltenham Borough area to accommodate about 10,917 new homes. This will be met through two strategic and cross-boundary urban extensions at North West Cheltenham and West Cheltenham; and the rest through smaller scale development meeting local needs in Cheltenham in accordance with its role as a Key Urban Area. The Cheltenham Plan, alongside the Joint Core Strategy, will provide the planning policies that will be used to guide and manage development over the plan period to 2031.
4. The Cheltenham Local Plan has been prepared in accordance with national planning requirements and informed by various technical studies, the Integrated Appraisal, and consultation with the public, stakeholders and the regulators. The Cheltenham Plan sets out the key challenges for the Cheltenham Borough area with a proposed Vision for the development until 2031 and Objectives to address key issues and to help deliver the Vision.
5. The Cheltenham Plan seeks to provide local detail that supports the strategic elements of policy contained within the GCT JCS around three primary issues; site allocations within the Borough (outside of the strategic allocations in the

JCS), a local economic strategy, and provision for local infrastructure (particularly local green space). These three primary issues informed the initial draft the Plan (Local Plan Part One Preferred Options, October 2016) with nine proposed Policies (five covering economic factors, including local employment allocations, two covering local green space, and a further two addressing local housing and mixed-use development allocations).

6. Comments received on the Cheltenham Plan (Part One) were taken into consideration in the preparation of the draft Plan for Regulation 19 consultation. The draft Plan has refined the proposed site allocations and included the development management policies, organised into sections covering topics as follows: Employment; Design; Green Belt; Landscape; Historic Environment; Residential; Housing Mix & Standards; Gypsies, Travellers & Travelling Showpeople; Health & Environmental Quality; Transport; Green Infrastructure; Social & Community Infrastructure; and Housing.
7. These policies, alongside the policies contained with the GCT JCS, will guide the planning and management of growth and development in the Cheltenham area to accommodate the necessary new housing and jobs whilst protecting important and valued environmental assets, including the historic heritage and biodiversity.

Integrated Appraisal (IA): SA, SEA, EqIA and HRA

8. The purpose of Sustainability Appraisal (SA) is to promote sustainable development through the integration of environmental, social and economic considerations in the preparation of Local Plans. This requirement for SA is in accordance with planning legislation and paragraph 165 of the National Planning Policy Framework. Local Plans must also be subject to Regulations for Strategic Environmental Assessment (SEA) and Government advises that an integrated approach is taken so that the SA process incorporates the requirements for SEA – and to the same level of detail.
9. Cheltenham Borough Council commissioned independent specialist consultants, Enfusion, to progress the appraisal work in May 2015. For the SA of the Cheltenham Plan, an integrated process has been undertaken that also addresses health and equality issues alongside the requirements of the Habitats Assessment Regulations (HRA) (HRA Report available separately). The findings of the health/equality and habitats assessments have been integrated into the SA. This is consistent with the approach taken to SA/SEA, EqIA and HRA for the GCT Joint Core Strategy.
10. SA is an iterative and ongoing process that informs plan-making by assessing developing elements of the plan, evaluating and describing the likely significant effects of implementing the plan, and suggesting possibilities for mitigating significant adverse effects and enhancing positive effects. UK Guidance suggests a staged approach to SEA. Initially the scope of the SA is determined by establishing the baseline conditions and context of the area, by considering other relevant plans and objectives, and by identifying issues, problems and opportunities. From this the scope, the Integrated

(Sustainability) Appraisal (IA) is prepared and includes an IA Framework of objectives for sustainable development in the Cheltenham Borough area, and which forms the basis against which the Cheltenham Plan is assessed.

Sustainability characteristics of the Cheltenham area and likely evolution without the Cheltenham Plan

- 11. Cheltenham is characterised by rich historic townscapes (containing highly valued designated and non-designated heritage assets), and valued landscapes. A significant part of the Borough lies within the Cotswolds Area of Outstanding Natural Beauty (AONB). The area has a strong economic base, with major employers such as GCHQ, two University sites, and strong tourism attractions such as Cheltenham Racecourse. The majority of businesses within the Borough are within the service sector, and average weekly earnings are higher in the Borough than found in the South West. The health of residents in Cheltenham is generally better than the England average, and deprivation is lower than the England average. Life expectancy for both men and women is higher than the England average, though inequalities across the Plan area exist. House prices are relatively high with an overall average house price of £311,502.
- 12. The whole of Cheltenham Borough is a designated Air Quality Management Area, and the Borough has high rates of residents who travel to work by car (higher than national average). The M5 motorway is the busiest route in the county and is located to the west of the Borough. Cheltenham also has a railway station in which main routes create connections with Gloucester, London, Birmingham and Bristol. There is much room for improvement in renewable energy provisions within the Borough. Key biodiversity sites include Sites of Special Scientific Interest (SSSIs) and local sites such as Local Nature Reserves and Key Wildlife Sites. Areas of the Borough are susceptible to flood risk.

Key Sustainability Issues, Problems and Opportunities

- 13. The key sustainability issues that were identified during the IA Scoping stage are summarised in the table below.

Key Sustainability Issues
<ul style="list-style-type: none"> ■ Maintaining and where appropriate, improving the quality of water bodies in the Borough (particularly the Rivers Chelt, Swilgate and Hatherley Brook) ■ Reducing the demand for water resources ■ Reducing the risk of flooding, particularly from surface water runoff, in new development and the impacts of flooding on existing development ■ Protecting and enhancing biodiversity where possible and required by legislation, and creating connections between existing and new GI and biodiversity sites ■ Maintaining and enhancing green/blue corridors to support the movement of

people and biodiversity

- Valuing local participation and responding to local views (e.g. designating locally valued green spaces identified through consultation, in the emerging Plan)
- The sensitivity of historic environment
- The promotion and enhancement of the cultural heritage of Cheltenham
- Protecting and enhancing designated and non-designated heritage assets and their settings, including archaeology
- Protecting and enhancing the landscape, in particular the Cotswolds AONB and its setting
- Protecting limited agricultural land supplies in the Borough
- Promoting development on previously developed land
- Protecting the Green Belt to avoid the coalescence of Cheltenham with Gloucester and Bishop's Cleeve
- Improving air quality in the Borough
- Promoting and increasing renewable energy generation capacity in the Borough as well as a continued decrease in energy consumption
- Ensuring communities can access key services, facilities, green/open space, and employment opportunities by sustainable modes of transport
- Reducing the demand for the private vehicle
- Reducing the impacts of development on the road network and on road capacity
- Maintaining and improving walking and cycle routes through the Borough
- Delivering a mix of housing, and delivering affordable housing, to avoid the exacerbation of existing inequalities in the Borough
- Reducing existing inequalities
- Supporting the retention of existing businesses, and promoting inward investment
- Creating new job opportunities and reducing the rate of economic inactivity
- Maintaining and enhancing high educational attainment levels found in the Borough

How has the Cheltenham Plan been assessed?

14. An IA Framework was compiled (based on that used for the GCT Joint Core Strategy to progress a consistency of approach), including IA Objectives with decision-aiding questions that aim to resolve the issues and problems identified for development planning in the Cheltenham Borough area. This IA Framework, together with the baseline information and Plans and Programmes Review comprises the basis for assessment.
15. Each developing element of the Cheltenham Plan, including potential site allocations and policies to manage proposed development, has been tested through IA. The likely effects of the emerging Cheltenham Plan were assessed using the IA Framework, the baseline information, and professional judgment. The IA considered positive, negative and cumulative effects according to categories of significance as set out in the following table:

Categories of Significance for SA		
Symbol	Meaning	Sustainability Effect
- -	Major Negative	Problematical and improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive
-	Minor negative	Potential sustainability issues: mitigation and/or negotiation possible
+	Minor positive	No sustainability constraints and development acceptable
++	Major Positive	Development encouraged as would resolve existing sustainability problem
?	Uncertain	Uncertain or Unknown Effects
0	Neutral	Neutral effect

16. Integrated (Sustainability) Appraisal is informed by the best available information and data. However, data gaps and uncertainties exist and it is not always possible to accurately predict effects at the plan level. For example, specific significance of effects on biodiversity, heritage assets, or changes to local level traffic flows may depend on more detailed studies and assessments that are more appropriately undertaken at the next stage of planning - at the project or site level. Climate change impacts are difficult to predict as the effects are most likely to be the result of changes at a cumulative and regional or national level, and therefore a precautionary approach that seeks to deliver best practice mitigation and adaptation is the most appropriate approach.

What reasonable alternatives have been considered and assessed?

17. The Cheltenham Plan is limited with regard to reasonable alternatives – at the strategic level these options have been tested through SA and the development of the JCS that sets out the strategic policies for Cheltenham. At the local level, Issues & Options were considered and the responses received through public consultation informed the preparation of the Preferred Options (October 2016). Potential site allocation options were investigated, tested through SA and reported in the IA Report (October 2016) that accompanied the Preferred Options Plan on consultation. Thus, relevant alternatives have been considered and tested through the IA process in an iterative and ongoing way such that the findings of the IA have informed the plan-making.
18. The proposed development management and allocation policies were tested using the IA Objectives grouped within sustainability themes to better consider inter-relationships between topics and to address implementation of the plan as a whole. These themes are the same as investigated for the SA/IA of the JCS, and are as follows:

- Housing, Health & Sustainable Communities

- The Economy, City Centre, Education & Skills, Culture & Tourism
- Sustainable Transport
- Flooding, Water Resources & Water Quality
- Air Quality & Climate Change
- Historic Environment & Cultural Heritage
- Biodiversity
- Landscape/Townscape
- Land & Soils; Green Space

What are the likely significant effects of the Cheltenham Plan?

19. Overall, the implementation of the policies presented in the Cheltenham Plan were found to have significant positive sustainability benefits, reflecting the iterative and ongoing inputs from technical studies, the wider evidence base, and comments received from public consultations on draft proposals. The key positive effects are as follows:
- Major long term and cumulative positive effects through meeting the housing and employment needs of the Cheltenham Borough area - will also support economic objectives; good quality housing will have major direct cumulative positive effects on health
 - Ensuring that supporting green infrastructure will be provided in new development with both short and long term positive effects
 - Support for the economy and employment – will also have further positive effects for health and wellbeing; the vitality of the city and town centres
20. Alongside the positive effects, some minor negative effects were also identified, largely as a result of the overall, cumulative effect of increased housing, employment and associated infrastructure development in the plan area. The key potential negative effects are summarised as follows:
- Noise, air quality reduction, pollution, and congestion, arising from the overall predicted growth in road based traffic
 - Effects on landscape and indirect effects for biodiversity, where local level habitats and ecological linkages are disturbed or removed – cumulative in the longer term

How could negative effects be mitigated?

21. A key function of the IA process is to inform the development of the plan, helping to mitigate identified negative effects and enhance positive effects. At each stage, any recommendations made from the SA are taken forward into the next stage of the plan making process.

22. Mitigation for potential negative effects is provided by policies within the higher-level Gloucester, Cheltenham and Tewkesbury Joint Core Strategy. A strong feature of the JCS is the protection of biodiversity at all levels in Policy SD10 with the commitment to Green Infrastructure in Policy INF4, recognising the many benefits it can provide, including managing flood risk, enhancing biodiversity, and providing recreational spaces for people. Potential negative effects on local biodiversity in the Cheltenham Plan will be mitigated through the requirement to conserve and improve biodiversity in new development, wherever possible.
23. Mitigation for potential negative effects is also provided by the development management policies including those for Green Infrastructure GI1-3, Historic Environment HE1-5, and Landscape L1 that recognise the special local characteristics of Cheltenham.

EqlA & HRA

24. The screening assessment has found that the Cheltenham Plan is unlikely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and as a result a full EqlA will not be required.
25. The Habitats Regulations Assessment (HRA) was updated to take into account comments from Natural England and the refinements/updating to the draft Plan resulting from the consultation in February- March 2017, and the adoption in November 2017 of the GCT JCS. The HRA screening continues to conclude that the Cheltenham Plan will not have adverse effects, alone or in combination, on the integrity of the identified European sites.

Consultation

26. The draft Cheltenham Plan Part One and its accompanying IA documents (October 2016) were subject to consultation during February – March 2017. Comments made on the IA documents were reviewed and responses prepared. The draft Plan has been refined and updated to take account of comments made and the updated Plan subject to IA. The Cheltenham Plan Regulation 19 and accompanying IA Report reflect the findings of various technical studies and responses received so far during consultation.
27. The Cheltenham Plan Regulation 19 and this accompanying Integrated (Sustainability) Appraisal Report will be available for consultation between January and March 2018. Comments made will be taken into account to prepare the Submission Plan that will be submitted to the Secretary of State for independent examination in due course in 2018.

Monitoring Proposals

28. The SEA Directive and Regulations require that the significant effects (positive and negative) of implementing the plan should be monitored in order to identify at an early stage any unforeseen effects and to be able to take appropriate remedial action. Government guidance on SA/SEA advises that existing monitoring arrangements should be used where possible in order to avoid duplication.
29. Government requires local planning authorities to produce Monitoring Reports (MRs), and the Cheltenham Borough Monitoring Report (produced annually) alongside the monitoring framework provided in the GCT JCS is considered sufficient to ensure appropriate monitoring takes place going forward.

1.0 INTRODUCTION

Sustainability (Integrated) Appraisal

- 1.1 The purpose of Sustainability Appraisal (SA) is to promote sustainable development through the integration of environmental, social and economic considerations in the preparation of Local Plans. This requirement for SA is in accordance with planning legislation¹ and paragraph 165 of the National Planning Policy Framework (NPPF). Local Plans must also be subject to Strategic Environmental Assessment^{2, 3} (SEA) and Government advises^{4,5} that an integrated approach is taken so that the SA process incorporates the requirements for SEA – and to the same level of detail.
- 1.2 In addition, the Council has chosen to integrate the Health Impact Assessment (HIA) and Equality Impact Assessment (EqIA) processes with the overarching SA/SEA process. HIA is not a statutory requirement for Councils; however, health considerations are a requirement of the SEA process and thus the overall SA process. Public bodies have a duty⁶ to assess the impact of their policies on different population groups to ensure that discrimination does not take place and where possible, to promote equality of opportunity. The SA, SEA, HIA and EqIA therefore all form part of the Integrated Appraisal (IA) process for the Cheltenham Plan. This Integrated (Sustainability) Appraisal (IA) Report is part of the evidence base for the Cheltenham Plan and it accompanies the Plan on statutory and public consultation.
- 1.3 The Council is also required to undertake a Habitats Regulations Assessment (HRA) of the Cheltenham Plan. The HRA process has its own legislative drivers and requirements; whilst the different processes can inform each other, it is important that the HRA remains distinguishable from the wider IA process. The HRA process has been undertaken in parallel to the IA, but the detailed method and findings have been reported separately.

The Gloucester, Cheltenham & Tewkesbury Joint Core Strategy

- 1.4 The currently adopted Cheltenham Borough Local Plan was prepared to cover the period 1991-2011 and is therefore being reviewed in consideration of the National Planning Policy Framework implemented in March 2012, the progress of the Gloucester, Cheltenham & Tewkesbury (GCT) Joint Core Strategy (JCS), and changing local circumstances.
- 1.5 Cheltenham Borough Council is working in partnership with Gloucester City Council and Tewkesbury Borough Council to prepare a Joint Core Strategy

¹ Section 19(5) of the 2004 Act and Regulation 22(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012

² EU Directive 2001/42/EC

³ Environmental Assessment of Plans and Programmes Regulations, 2004

⁴ DCLG - National Planning Practice Guidance' 2014, ODPM - 'A Practical Guide to the SEA Directive' 2005, Planning Advisory Service – 'The Principles of Plan Making Chapter 6 - The Role of Sustainability Appraisal' 2013

⁵ DCLG, 2012 National Planning Policy Framework

⁶ Equality Act, 2010

(JCS)⁷ that will guide development in the area up to 2031. The purpose of the JCS is to produce a co-ordinated strategic development plan to show how the area will develop over this period. The JCS is the spatial expression of the vision and strategic objectives for the overall GCT area. The JCS was submitted to the Secretary of State for examination on 20 November 2014. Three Hearing sessions were held between May 2015 and July 2016.

- 1.6 The Inspector's Interim Report (May 2016) set out the conclusions of the examination to date, including recommendations for main modifications to the JCS. Based on updated economic evidence, the Objectively Assessed Housing Need (OAHN) for the JCS area was increased to 35,175 dwellings. The Proposed Modifications were mostly concerned with meeting this uplift in housing need through strategic allocations. The changes were subject to consultation and discussed at the resumed examination in July 2017. The Inspector considered comments made in order to prepare her final report (October 2017)⁸ that concluded the JCS to be found sound subject to an immediate partial review.

The Cheltenham Plan

- 1.7 The Cheltenham Plan covers the administrative area of Cheltenham and is part of a hierarchy of planning guidance, sitting underneath the higher level JCS and national planning guidance. The Cheltenham Plan considers issues specific to Cheltenham Borough, such as the valued heritage assets and setting of the town, and includes lower level development management policies to be used in the determination of planning applications. It also identifies locations to accommodate non-strategic development as required by the JCS. The JCS and lower level Cheltenham Plan, along with the Gloucestershire Minerals and Waste Local Plans and any Neighbourhood Plans, will (when adopted) form the statutory Local Plan for the Borough.
- 1.8 The Cheltenham Plan has been developed in two parts - both seeking to provide local detail that supports the strategic elements of policy contained within the GCT JCS. The Plan (Part One Preferred Options October 2016) focused on three primary issues: site allocations within the Borough (outside of the strategic allocations in the JCS), a local economic strategy, and provision for local infrastructure (particularly local green space). Comments made during consultation were taken into account in the preparation of the draft Cheltenham Plan (November 2017) that also includes the second part of the plan with detailed development management policies (including some policies carried forward from the adopted plan).
- 1.9 Local communities, businesses and visitors have all helped to shape what the Cheltenham Plan should deliver (the Vision) and how it should be achieved (the Objectives). The Vision is organised under three themes A-C, as follows:

⁷ <https://jointcorestrategy.org/>

⁸ <https://jointcorestrategy.org/examination>

Vision Theme A: *Cheltenham is a place where people live in strong, safe, healthy, well-served and well-connected communities*

Objectives Theme A:

- a) Recognise the local distinctiveness of Cheltenham's various neighbourhoods and deliver regeneration where appropriate;
- b) Ensure provision of sufficient housing land and other opportunities for residential development that meets the needs of the current and future population of the Borough;
- c) Understand what people need from the places where they live and work to help create socially sustainable communities via local models;
- d) Ensure that new communities are integrated with neighbouring communities to promote cohesion and reduce social isolation;
- e) Enable investment in schools, healthcare and other community facilities and meeting places in order to support new and existing communities;
- f) Increase opportunities for sport and active leisure, particularly in areas of under-provision;
- g) Ensure that places are designed in a way that is accessible to all and where barriers to walking and cycling are removed so that active travel and public transport are the default choices
- h) Support a network of neighbourhood centres that provide an appropriate range of local amenities to support sustainable communities; and
- i) Ensure that new development protects public safety and amenity and creates environments that contribute to reducing crime and fear of crime.
- j) Improve health outcomes by promoting and prioritising active travel.

Vision Theme B: *Cheltenham is a place with a prosperous and enterprising economy where education and employment opportunities are increasing and diversifying, where businesses choose to invest and where the benefits are felt by all.*

Objectives Theme B:

- a) Ensure provision of sufficient employment land and other opportunities for economic development to attract new businesses and to enable existing businesses to grow and develop within Cheltenham;
- b) Promote the development of adaptable and flexible employment space within Cheltenham so that sites and buildings can be re-used with minimal environmental impact;
- c) Assist in developing and maintaining an attractive retail offer in the town centre and other designated centres;
- d) Deliver a range of sustainable transport choices through appropriate infrastructure improvements including better cross-town and local links, prioritised junctions, and improved public transport.
- e) Encourage knowledge-intensive services businesses in high value sectors;
- f) Support development of Cheltenham's educational facilities to ensure that the young people have access to a wide range of opportunities.

Vision Theme C: *Cheltenham is a place where the quality and sustainability of our cultural assets and natural and built environment are valued and recognised locally, nationally and internationally and tourists choose to visit and return to.*

Objectives Theme C:

- a) Conserve and enhance Cheltenham's architectural, townscape and landscape heritage, particularly within the town's conservation areas;
- b) Conserve, manage and enhance Cheltenham's natural environment and biodiversity;
- c) Support development of Cheltenham's sporting, cultural, arts and tourism infrastructure (including public art) to ensure that the Borough maintains its reputation as a cultural destination and continues to be an attractive place to visit;
- d) Address the challenge of climate change, ensuring that development meets high design and sustainability standards and is built to be adaptable over the long term;
- e) Create a walkable network of interconnected, multifunctional green spaces that link with the wider countryside;
- f) Support provision, maintenance and continued investment in a high quality public and private realm, including formal and informal green spaces and private gardens that contribute to local amenity and wildlife biodiversity; and
- g) Manage and reduce the risk of flooding within the Borough.

1.10 The Cheltenham Plan comprises chapters including the Policies and Site Allocations, as follows:

- Introduction
- Vision and Objectives
- Scale & Distribution of New Development JCS Policies SP1-2
- Employment – JCS SD2; Local Policies EM1-6
- Design Requirements -JCS Policy SD5; Local Policies D1-D3
- Green Belt – JCS Policy SD6; Local Policies GB1-2
- Landscape – JCS Policy SD7; Local Policy L1
- Cotswold Area of Outstanding Beauty – JCS Policy SD8
- Historic Environment – JCS Policy SD9; Local Policies HE1-5
- Biodiversity and Geodiversity – JCS Policy SD10
- Health and Environmental Quality – JCS Policy SD15; Local Policy SL1
- Housing Mix and Standards – JCS Policy SD12; Local Policies HM1-4
- Gypsies, Travellers and Travelling Showpeople – JCS Policy SD14; Local Policy GT1
- Green Infrastructure – JCS Policy INF4; Local Policies GI1-3
- Renewable Energy and Low Carbon Energy Development – JCS Policy INF6
- Retail and City/Town Centres – JCS Policy SD3

- Social and Community Infrastructure – JCS Policy SD5; Local Policies CI1-4
- Transport Network – JCS Policy INF1; Local Policies TN1-2
- Residential Development – JCS Policy SD11; Local Policies H1-2

Integrated Appraisal (IA): Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA), Health Impact Assessment (HIA), and Habitat Regulations Assessment (HRA).

- 1.11 For the IA of the Cheltenham LP, an integrated process has been undertaken that includes the requirements for Sustainability Appraisal (SA) as set out in national planning guidance⁹ and to meet with the requirements of the EU SEA Directive as implemented in UK legislation through the SEA Regulations, 2004¹⁰. For development planning documents in England, sustainability appraisal should address socio-economic factors to the same level of detail as environmental factors and as required by the SEA Regulations.
- 1.12 This IA also addresses health and equality issues¹¹ alongside the requirements of the Habitats Directive¹² as implemented into UK legislation through the Habitats Regulations¹³. The findings of the health/equality and habitats assessments have been integrated into the Sustainability Appraisal. The Equality Impact Assessment (EqIA) and Habitats Regulations Assessment (HRA) are provided separately as they are subject to different legislation and guidance. This is consistent with the approach taken to SA/SEA, EqIA and HRA for the appraisal of the higher level plan - the Gloucester, Cheltenham & Tewkesbury Joint Core Strategy. The Council commissioned independent specialist consultants Enfusion to progress the appraisal work in May 2015.
- 1.13 Integrated (Sustainability) Appraisal is an iterative and ongoing process that informs plan-making by assessing developing elements of the plan, evaluating and describing the likely significant effects of implementing the plan, and suggesting possibilities for mitigating significant adverse effects and enhancing positive effects. UK Guidance suggests a staged approach to SEA¹⁴. Initially the scope of the IA is determined by establishing the baseline conditions and context of the plan by considering other relevant plans and objectives, and by identifying issues, problems and opportunities for the area. From this the scope the IA is prepared and includes an IA Framework of objectives for sustainable development in the plan area and which forms the basis against which the plan is assessed.
- 1.14 An integrated approach to appraisal and assessment brings resource efficiencies and allows complementary issues to be considered concurrently.

⁹ <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans/>

¹⁰ <http://www.legislation.gov.uk/uksi/2004/1633/contents/made>

¹¹ To demonstrate compliance with the Equality Act, 2010

¹² EU Directive 1992/43/EEC (and see also NPPF paragraphs 14 & 117)

¹³ The conservation of Habitats & Species Regulations, 2010

¹⁴ ODPM A Practical Guide to the SEA Directive 2005

The Government's extant guidance recognises value in undertaking Habitats Regulations Assessment (HRA) and SA concurrently (although the findings and reporting of the two processes should be kept distinct)¹⁵. In practice, the evidence base for both processes can be shared with Habitats Regulations Assessment findings and conclusions supporting the SA/Strategic Environmental Assessment.

Habitats Regulations Assessment (HRA)

- 1.15 The Conservation of Habitats and Species Regulations (amendment) (2011) [the Habitats Regulations] require that HRA is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of any European site designated for its nature conservation importance. The HRA screening (and any more detailed Appropriate Assessment) considers if the potential impacts arising as a result of the Cheltenham Plan are likely to have significant effects on these sites either alone or in combination with other plans and projects. The methods and findings of the HRA process is set out in a separate HRA Report that will be sent to the statutory consultee (Natural England) and placed on consultation for the wider public. The HRA findings have informed the IA.

Equality & Diversity Impact Assessment (EqIA)

- 1.16 In addition, the Council has chosen to integrate the health and equality impact assessment processes within the overarching Integrated Appraisal (IA) process; this is consistent with the approach taken by the higher-level plan – the Gloucester, Cheltenham & Tewkesbury Joint Core Strategy. Health Impact Assessment is not a statutory requirement for Councils; however, health considerations are a requirement of the SEA process and thus the overall IA process. Public bodies have a duty¹⁶ to assess the impact of their policies on different population groups to ensure that discrimination does not take place and where possible, to promote equality of opportunity.
- 1.17 For the appraisal of the Cheltenham Plan, the integration of health and equality concerns has focused on ensuring that these issues are well represented in the IA Framework [through objectives and decision-aiding questions] against which the emerging policies are assessed. Consideration of health and equality issues has been addressed iteratively as the appraisal process has progressed. Details of the Equality Impact Assessment (EqIA) are also presented separately to demonstrate compliance with the Equality Act (2010) as Appendix VIII to this IA Report.

Consultation: Statutory, Public & Stakeholder Engagement

- 1.18 Consultation has been an important part of the development of the Cheltenham Plan since early preparation. The Cheltenham Plan Scope was subject to consultation during June-September 2013; comments received

¹⁵ Planning for the Protection of European Sites: Appropriate Assessment: Guidance for Regional Spatial Strategies and Local Development Documents (DCLG, August 2006)

¹⁶ Equality Act, 2010

informed the next stage of plan-making - the Issues and Options and subject to a 6-week consultation in 2015. The Preferred Options Plan (Part One) was subject to consultation 6 February – 20 March 2017. Again, comments received at each stage of plan-making have informed the next stage. The Council has published Consultation Statements¹⁷ for the 2015 and 2017 consultations.

- 1.19 The Issues & Options version of the Plan was accompanied by the Draft IA Scoping Report (June 2015) for consultation, including the SEA statutory consultees (Historic England, Environment Agency and Natural England). The representations received were considered and reported in the Final IA Scoping Report (Appendix II). The Preferred Options draft of the Plan was also accompanied by the IA Report (October 2016) and the responses to the representations made are reported in Appendix V of this IA Report that accompanies the Draft Cheltenham Plan on Regulation 19 consultation.
- 1.20 The Integrated Appraisal studies and findings continue to inform the ongoing development of the Cheltenham Plan and comprise part of the evidence base for the emerging plan. The chronology of the plan preparation, consultation, and the accompanying IA stages is as follows:

Table 1.1: Cheltenham Plan with IA Stages and Documents

Cheltenham LP Stage and Documents Consultation	IA Stage and Documents Consultation
Cheltenham Plan Scope Consultation (Regulation 18) July to September 2013	N/A
Draft Vision and Objectives published February 2014	N/A
Issues and Options Consultation June 2015	IA Draft Scoping Report Consultation June 2015
Preferred Options Regulation 18 Consultation November 2016 / January 2017	Draft IA Report Consultation November / December 2016
Pre-Submission Draft Plan Regulation 19 Consultation November-December 2017	Draft IA Report Regulation 19 Consultation November-December 2017
Submission Plan Submission to the Secretary of State Spring 2018 Examination TBC: Autumn 2018	Final IA Report Submission to the Secretary of State Spring 2018 Examination TBC: Autumn 2018

Summary of Compliance with SEA Directive & Regulations

- 1.21 The Strategic Environmental Assessment Regulations set out certain requirements for reporting the SEA process, and specify that if an integrated appraisal is undertaken (i.e. SEA is subsumed within the SA process, as for this integrated appraisal of the Plan), then the sections of the SA Report that meet the requirements set out for reporting the SEA process must be clearly

¹⁷ https://www.cheltenham.gov.uk/info/46/planning_policy/1034/the_cheltenham_plan/2

signposted. The requirements for reporting the SEA process are set out in Appendix 1 of this IA Report.

Structure of this Integrated (Sustainability) Report

- 1.22 Following this introduction, Section 2 of the IA Report sets out the methods used to appraise the emerging elements of the Cheltenham Plan. Section 3 describes the sustainability context for the IA, including the objectives of other relevant plans and programmes, and the baseline characteristics of the area (full details in Appendices III & IV). Section 4 explains how options are considered and assessed in plan-making and how alternatives are considered in IA in order to explicitly demonstrate compliance with the requirements of the SEA Regulations.
- 1.23 Section 5 summarises the overall findings of the IA of the Cheltenham Plan (Part One Preferred Options, February 2017). The detailed integrated appraisals of potential site allocations are provided in Appendix VII. Section 6 describes the changes made as a result of the Preferred Options consultation and updated evidence. The effects of the proposed policies and the implementation of the plan as a whole are described according to sustainability themes.
- 1.24 Appendix VIII details the findings of the EqIA and provides a separate document to demonstrate compliance for the Council with the requirements of the Equality Act, 2010. The Habitats Regulations Assessment Report accompanies the draft Cheltenham Plan; the findings are summarised and have been taken into account in this IA Report.
- 1.25 The SEA Directive and Regulations require that the Report should include a description of the measures envisaged concerning monitoring and such proposals are set out in Section 7. Summary conclusions are provided in Section 8, together with the next steps for the plan and the IA. In accordance with the SEA Directive, a Non-Technical Summary is also provided – at the beginning of this IA Report and also available separately. Appendix I provides signposting to explain how this SA complies with the requirements of the SEA Directive – and as required by the Directive.

2.0 SUSTAINABILITY APPRAISAL METHODS

Introduction

- 2.1 Integrated (Sustainability) Appraisal incorporating Strategic Environmental Assessment is an iterative and ongoing process that aims to provide a high level of protection for the environment and to promote sustainable development for plan-making. The role of IA is to inform the Council as the planning authority; the IA findings do not form the sole basis for decision-making – this is informed also by other studies, feasibility and feedback from consultation. There is a tiering of appraisal/assessment processes (see also later Figure 4.1) that align with the hierarchy of plans – from international, national and through to local.
- 2.2 This tiering is acknowledged by the NPPF (2012) in paragraph 167 that states that “Assessments should be proportionate and should not repeat policy assessment that has already been undertaken.” The Gloucester, Cheltenham & Tewkesbury Joint Core Strategy (GCT JCS) is a strategic planning document that provides strategic policy and allocations to guide promoters, communities and the three Councils in their decisions regarding proposed development. The Cheltenham Plan is a lower level planning document that is in conformity with the Joint Core Strategy and national planning requirements. IA is a criteria-based assessment process with objectives aligned with the issues for sustainable development that are relevant to the plan and the characteristics of the plan area.
- 2.3 This IA is an Integrated Appraisal that has incorporated the requirements of the EU SEA Directive, the findings from the Habitat Regulations Assessment (HRA), and the findings of the Equality and Diversity Impact Assessment (EqIA). Since the Habitats Regulations Assessment (HRA) and the EqIA are driven by distinct legislation, the HRA Report and the EqIA Report are provided separately to clearly demonstrate compliance.

Scoping and the IA Framework

- 2.4 During 2015 (and the early stages of the Draft Cheltenham Plan preparation), relevant plans and programmes (PP) were reviewed and baseline information was gathered and analysed by the independent specialist consultants, Enfusion, to help identify the issues, problems and opportunities for the area (further detailed in the following Section 3). The details of this analysis were reported in technical Appendices I & II to the Draft IA Scoping Report June 2015¹⁸.
- 2.5 A Framework of IA objectives, sub-objectives (decision-aiding questions) and thresholds of significance was developed from the key issues identified. This framework aims to promote and/or protect sustainability factors that are relevant to the Cheltenham Borough area and its timescale for

¹⁸ <http://consult.cheltenham.gov.uk/consult/ti/CheltplanIO2015>

implementation in the period up to 2031. It forms the basis against which emerging elements of the Cheltenham Plan are appraised using both quantitative and qualitative assessment, the evidence base, and professional judgment.

- 2.6 The IA Scoping Report set out the process undertaken and it was published on the Cheltenham Borough Council website in June 2015 and subject to public consultation including the SEA statutory consultees (Historic England, the Environment Agency, and Natural England). As a result of the comments received, minor amendments and additions were made to the baseline and PP review; along with a minor amendment to the identified key issues. The consultation comments are provided here in this IA Report at Appendix V, together with a summary of how they were taken into account. The final IA Scoping Report is provided separately in Appendix II as part of this IA Report.
- 2.7 The final IA Framework of Objectives, Decision-Aiding Questions, and certain thresholds of significance is set out in the following Table 2.1 (including cross-references for the key requirements in the NPPF and relevant GCT JCS SA Objectives):

Table 2.1 IA Framework

IA Objective		Decision making criteria: Will the option / proposal...	Assumptions or uncertainties	Significance criteria: standards and thresholds for IA	
1	<p>Housing Ensure everyone has access to a high quality home that they can afford and that meets their needs.</p> <p>Relevant NPPF Paragraphs: 47-68</p> <p>Relevant GCT JCS SA Objectives: 15</p>	<ul style="list-style-type: none"> Identify an appropriate land supply for housing? Ensure everyone has access to high quality and flexible housing? Provide enough affordable housing to meet local needs? Support the existing housing stock? Support minority groups with appropriate provisions, including Gypsies and Travellers? Deliver zero carbon homes? 	<p>It is assumed that development at any of the site options has the potential to meet the design standards of the NPPF, Building Regulations and the Government's zero carbon buildings policy.</p> <p>It is assumed that development at any of the site options has the potential to meet the affordable housing requirements set out in the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy.</p> <p>The nature and significance of the effects on this IA Objective will primarily relate to the capacity of the site to accommodate housing development, and the timescale for delivery, those sites that can be delivered in the immediate term are considered to have a significant positive effect as it addresses the backlog in housing delivery.</p> <p>The Cheltenham Borough</p>	++	Site option has the potential to accommodate housing in the immediate term and address housing backlog. Potential for major long term positive effect.
				+	Site option has the potential to accommodate housing in the longer term of the plan period. Potential for minor long term positive effect.
				0	If no housing is being proposed as part of development, as it is an employment site, then it is considered to have a neutral effect against this IA Objective.
				?	Capacity of the site to accommodate residential development is unknown.
				-	Not applicable.
				--	Not applicable.

			Council Sites Assessment will be used to inform the IA in regards to site capacity and delivery term.		
<p>2</p> <p>Economy, Employment and Tourism Ensure the availability of employment land and premises to encourage inward investment and support the growth of existing businesses and the vitality of the town and its suburbs.</p> <p>Relevant NPPF Paragraphs: 18-22</p> <p>Relevant GCT JCS SA Objectives: 10, 11, 17</p>	<ul style="list-style-type: none"> ■ Support the vitality and viability of the town and its suburbs? ■ Enhance the quality of the public realm? ■ Support the retention and enhancement of existing businesses? ■ Deliver new employment land? ■ Provide opportunities to connect with existing housing, facilities and amenities? ■ Provide opportunities to connect with sustainable transport modes? ■ Encourage inward investment? ■ Promote tourism and cultural distinctiveness? 	<p>2 a) This IA Objective will address two separate issues relating to employment. The first is the capacity of the site to accommodate employment land as well as the potential loss of existing employment, and the second is access to existing employment areas.</p> <p>Access to existing transport modes has been addressed against IA Objective 5.</p> <p>The Cheltenham Borough Council Sites Assessment will be used to inform the IA in regards to site capacity.</p> <p>The nature and significance of the effects against this IA Objective will primarily relate to the capacity of the site to accommodate employment land, and the potential loss of existing employment.</p>			
			++	Potential for the site option to accommodate a significant level of employment development (greater than 1 ha).	
			+	Potential for the site option to accommodate employment development (less than 1ha).	
			0	If no employment land is being proposed as part of development, as it is a housing site, then it is considered to have a neutral effect against this IA Objective.	
			?	Capacity of the site to accommodate employment development is unknown.	
			-	Development at the site may restrict other employment development and/ or has poor access to existing employment opportunities.	
			--	Development at the site may prevent other employment development and/ or lead to the loss of existing employment.	
			++	Site is within 400m of a strategic	
		2 b) This IA Objective will			

			<p>address two separate issues relating to employment. The first is the capacity of the site to accommodate employment land, and the potential loss of existing employment, and the second is access to existing employment areas.</p> <p>Access to existing transport modes has been addressed against IA Objective 5.</p> <p>Access is measured using GIS map layers provided by Cheltenham Borough Council.</p> <p>The nature and significance of the effects against this IA Objective will primarily relate to the distance of the site from existing employment areas.</p>	<p></p> <p></p> <p>+</p> <p></p> <p>0</p> <p></p> <p>?</p> <p></p> <p>-</p> <p></p> <p>--</p>	<p>employment area. Development has the potential to reduce reliance on the private vehicle.</p> <p>Site is within 800m of an employment area and is likely to reduce reliance on the private vehicle.</p> <p>A neutral effect is not considered possible</p> <p>An element of uncertainty exists.</p> <p>The site is within 800m of an employment area, but development is less likely to reduce reliance on the private vehicle (i.e. steep topography or lack of suitable footpath).</p> <p>The site option is beyond 800m to an existing employment area. Development is likely to continue reliance on the private vehicle.</p>
3	<p>Healthy Communities Support communities with inclusive design,</p>	<ul style="list-style-type: none"> Reduce opportunities for crime? Make people feel safer through good design? 	<p>It is assumed that development at any of the site options has the potential for design that minimises opportunities for crime, and</p>	<p>++</p>	<p>It is considered unlikely that development at any of the site options will have major positive effects on health.</p>

<p>promote healthy lifestyles and reduce inequalities in wellbeing and opportunity.</p> <p>Relevant NPPF Paragraphs: 69-78</p> <p>Relevant GCT JCS SA Objectives: 12, 13, 14, 16, 17</p>	<ul style="list-style-type: none"> ■ Enable everyone to participate in local decision making? ■ Encourage healthy and active lifestyles? ■ Be surrounded by compatible land uses? ■ Ensure that existing open spaces, gardens, allotments are protected and enhanced? ■ Help to reduce inequalities in wellbeing and opportunity? 	<p>that makes people safer.</p> <p>It is assumed that development at any of the site options has the potential for short-term minor negative effects arising during construction phases, and that suitable mitigation exists to ensure that these do not result in long-term negative effects on health and wellbeing.</p> <p>It is assumed that development at any of the site options has the potential for indirect long-term positive effects on health through the provision of housing or employment by helping to meet the needs of the Borough.</p> <p>It is assumed that any proposal for development can make appropriate and timely provision for necessary supporting infrastructure, including health, green infrastructure and other community facilities and services, or contributions towards them.</p> <p>It is therefore considered that the nature and significance of</p>	+	<p>The site option is within a reasonable walking distance of green / open space, and surrounded by compatible land uses</p>
			0	<p>The site is not likely to be affected by neighbouring land uses or major infrastructure. Potential for a residual neutral effect.</p>
			?	<p>An element of uncertainty exists until more detailed site level assessments have been undertaken.</p>
			-	<p>The site is affected by neighbouring land uses or major infrastructure and / or is not within a reasonable walking distance of green / open space.</p>
			--	<p>The site is affected by neighbouring land uses or major infrastructure and is located over 300m from green / open space.</p>

			<p>the effects against this IA Objective will primarily relate to neighbouring land uses and access to green / open space, or the loss of green / open space as a result of development at the site.</p> <p>Is the site located within a Cordon Sanitaire area?</p> <p>The Cheltenham Borough Council Sites Assessment will be used to inform the IA in regards to neighbouring land uses.</p>		
<p>4</p> <p>Access to Services and Facilities Improve provision and accessibility to services and facilities, including health and educational facilities.</p> <p>Relevant NPPF Paragraphs: 29-46</p> <p>Relevant GCT JCS SA Objectives: 12, 14</p>	<ul style="list-style-type: none"> ■ Support housing growth with good access to existing services and facilities? ■ Provide adequate means of access to health care and educational facilities? ■ Increase provision of local services and facilities? 	<p>It is assumed that any proposal for development can make appropriate and timely provision for necessary supporting infrastructure, including health, green infrastructure, and other community facilities and services.</p> <p>Access is measured using Maiden services provided by Gloucestershire County Council.</p> <p>The nature and significance of</p>	<p>++</p>	<p>Site is within 400m of all services and facilities (including health and educational). Development has the potential to reduce reliance on the private vehicle.</p>	
			<p>+</p>	<p>Site is within 800m of most services and is likely to reduce reliance on the private vehicle.</p>	
			<p>0</p>	<p>A neutral effect is not considered possible</p>	
			<p>?</p>	<p>An element of uncertainty exists.</p>	

			effects against this IA Objective will primarily relate to the accessibility of a range of services and facilities including; supermarket, post office, library, primary school, secondary school, children's centre, GP, Pharmacy, A&E / MIU and fitness facilities.	-	The site is within 800m of most facilities and services, development is less likely to reduce reliance on the private vehicle (i.e. steep topography or lack of suitable footpath).
				--	The site option is beyond 800m to all existing facilities and services. Development is likely to continue reliance on the private vehicle.
5	<p>Access to Sustainable Transport Modes Maximise the use of sustainable modes of transport and reduce the need to travel by car</p> <p>Relevant NPPF Paragraphs: 29-46</p> <p>Relevant GCT JCS SA Objectives: 8</p>	<ul style="list-style-type: none"> Maximise opportunities for cycling and walking? Provide adequate means of access to public transport modes? Reduce the frequency and duration of journeys by private car? 	<p>5 a) This IA Objective will address two separate issues relating to access to sustainable transport modes. The first being access to public transport modes and the second being access to strategic footpaths and cycle routes.</p> <p>It is assumed that development at any of the site options could potentially provide or contribute to improved sustainable modes of transport.</p> <p>It is also assumed that any proposal for development can make appropriate and timely provision for necessary supporting infrastructure, including health, green</p>	++	Site has good access to all sustainable transport modes; within 400m of bus connections, and 800m of a train station. Development has the potential to reduce the need to travel by car. There are no potential barriers to movement.
				+	The site has access to either bus (within 400m) or a train station (within 800m). Development is likely to reduce the need to travel. There are no potential barriers to movement.
				0	A neutral effect is not considered possible.
				?	There is an element of uncertainty for all site options.

			<p>infrastructure and other community facilities and services.</p> <p>Access is measured using Maiden services provided by Gloucestershire County Council.</p> <p>The nature and significance of the effects against this IA Objective will primarily relate to access to existing modes of public transport.</p> <p>Where necessary the appraisal will note the realities of the situation with regard to existing access, for example if there are barriers to movement.</p>	-	<p>The site has access to either bus (within 400m) or a train station (within 800m). Development is less likely to reduce the need to travel. There may be barriers to movement.</p>
				--	<p>Site option is not within a reasonable walking distance (over 800m) of a bus connection or a train station. Development is likely to increase the need to travel by car. There may be significant barriers to movement.</p>
			<p>5 b) This IA Objective will address two separate issues relating to access to sustainable transport modes. The first being access to public transport modes and the second being access to strategic footpaths and cycle routes.</p>	++	<p>Site has good access (within 400m) to strategic footpath and cycle routes. Development has the potential to reduce the need to travel by car. There are no potential barriers to movement.</p>
			<p>It is assumed that development at any of the site options could potentially provide or contribute to</p>	+	<p>The site has good access (within 400m) to either strategic footpaths or strategic cycle routes. Development has the potential to reduce the need to travel by car. There are no potential barriers to movement.</p>
				0	<p>A neutral effect is not considered</p>

			<p>improved sustainable modes of transport.</p> <p>It is also assumed that any proposal for development can make appropriate and timely provision for necessary supporting infrastructure, including health, green infrastructure and other community facilities and services.</p> <p>Access is measured using Maiden services provided by Gloucestershire County Council.</p> <p>The nature and significance of the effects against this IA Objective will primarily relate to access to existing strategic pedestrian and cycle routes.</p> <p>Where necessary the appraisal will note the realities of the situation with regard to existing access, for example if there are barriers to movement.</p> <p>The appraisal commentary will make a judgement on the overall accessibility (to public transport, services and facilities and employment) of</p>	<p>possible.</p> <p>?</p> <p>-</p> <p>--</p>	<p>There is an element of uncertainty for all site options.</p> <p>The site has access (within 400m) to either strategic footpaths or strategic cycle routes. Development is less likely to reduce the need to travel. There may be barriers to movement.</p> <p>The site is not within reasonable distance (400m) of strategic footpaths or cycle routes. Development is likely to increase the need to travel by car. There may be significant barriers to movement.</p>
--	--	--	--	--	--

			the site options with regard to IA Objectives 4 and 5 and whether a particular site option is more likely to reduce the need to travel?		
<p>6</p> <p>Traffic To ensure safety and ease of access to the existing road network, and ensure that there is capacity to accommodate growth.</p> <p>Relevant NPPF Paragraphs: 29-41</p> <p>Relevant GCT JCS SA Objectives: 8</p>	<ul style="list-style-type: none"> ■ Provide safe and clear access to the road network? ■ Overload the surrounding work network? ■ Increase traffic in the area? ■ Exacerbate any congestion issues? 	<p>The nature and significance of the effects against this IA Objective will primarily relate to traffic impacts / road capacity and site access.</p> <p>Cheltenham Borough Council's traffic modelling report will inform the IA.</p>	++	Development has the potential to significantly reduce levels of traffic in an area that is experiencing congestion issues.	
			+	Development has the potential to reduce levels of traffic. Potential for a minor positive effect.	
			0	There is satisfactory access to the road network and the site is well located in respect of the road network and vehicle movements. Whilst development at the site has the potential to increase traffic, there is suitable mitigation available to reduce negative effects with the potential for a residual neutral effect.	
			?	An element of uncertainty exists until more detailed lower level surveys and assessments have been carried out.	
			-	Development has the potential to increase traffic in the surrounding road network and there is no satisfactory access to the site from the road network or the site is not well located in respect of the road network and vehicle movements. Mitigation available, potential for a residual minor negative effect.	

				--	Development is likely to increase the levels of traffic in an area that is already experiencing congestion issues, there is no satisfactory access to the site from the road network, and the site is not well located in respect of the road network and vehicle movements. Mitigation difficult and/or expensive.
7	Air Quality and Climate Change To reduce the contribution to climate change and reduce the contribution to atmospheric pollution, including greenhouse gases. Relevant NPPF Paragraphs: 93-125 Relevant GCT JCS SA Objectives: 2, 3, 5, 6, 9	<ul style="list-style-type: none"> ■ Reduce Cheltenham Borough's carbon footprint? ■ Ensure that sustainable construction principles and standards are integrated into all development schemes, aiming for the highest possible standards? ■ Ensure new and existing buildings, infrastructure and the environment are resilient to the effects of extreme weather events? ■ Help people, businesses and the environment to adapt to the physical and social impacts of climate change? 	It is assumed that development at any of the site options has the potential to meet the design standards of the NPPF, Building Regulations and the Government's zero carbon buildings policy. It is assumed that any proposal for development can ensure high standards of energy efficiency in construction and occupation. Flood risk has been assessed against IA Objective 9. It is assumed that any proposal for development can incorporate climate change adaptation measures. The nature and significance of the effects against this IA	++	Development has the potential to significantly reduce emissions within an area that experiences congestion issues.
				+	Development has the potential to reduce levels of emissions. Potential for a minor positive effect.
				0	Whilst development at the site has the potential to increase emissions, there is suitable mitigation available to reduce negative effects with the potential for a residual neutral effect.
				?	An element of uncertainty exists until more detailed lower level surveys and assessments have been carried out.
				-	Development has the potential to increase emissions. Mitigation available, potential for a residual minor negative effect.
				--	Development is likely to increase the levels of emissions in an area that already experiences

			Objective will primarily relate to emissions. A significant source of emissions comes from traffic, therefore the appraisal commentary will make a judgement on the overall effect of development on air quality and climate change considering IA Objectives 6 and 7.		congestion issues. Mitigation difficult and/or expensive.
8	Water Resources and Quality To reduce the demand for water, and maintain and improve the quality of water Relevant NPPF Paragraphs: 94,99, 109-125 Relevant GCT JCS SA Objectives: 5, 6	<ul style="list-style-type: none"> ■ Reduce the demand for water? ■ Enhance opportunities for water recycling? ■ Improve the quality of water? 	The nature and significance of effects on water quality is dependent on whether the site option lies within a Surface Water Safeguard Zone, Ground Water Safeguard Zone, or Water Protection Zone.	++	Development has the potential to significantly enhance water quality.
				+	Development has the potential to enhance water quality.
				0	The site is not within any Surface Water Safeguard Zones, Ground Water Safeguard Zones, or Water Protection Zones.
				?	There is an element of uncertainty until more detailed lower level surveys and assessments have been carried out.
				-	Site option lies partially within a Surface Water Safeguard Zone, Ground Water Safeguard Zone, or Water Protection Zone.
				--	It is considered unlikely that development at any of the site options will have a major negative

					effect on water quality.
9	Flooding To manage and reduce flood risk. Relevant NPPF Paragraphs: 93-108 Relevant GCT JCS SA Objectives: 4	<ul style="list-style-type: none"> ■ Ensure that the risk of flooding in the immediate vicinity and in the wider catchment is not increased as a result of development? ■ Ensure that surface water run-off is slowed and absorbed? ■ Ensure that surface water run-off does not increase flood risk in the immediate vicinity or the wider catchment? ■ Include the use of Sustainable Drainage Systems? ■ Maximise water collection opportunities? 	<p>It is considered that the nature and significance of the effects against this IA Objective will primarily relate to flood risk.</p> <p>There is an element of uncertainty for all sites until more detailed lower level surveys and assessments have been carried out.</p>	++	The site option is not located within an area of flood risk and there is evidence that development could offer an opportunity to potentially reduce flood risk.
				+	The site option is not located within an area of flood risk.
				0	The site is partially within an area of high flood risk but development can avoid this area / suitable mitigation is available resulting in a residual neutral effect.
				?	There is an element of uncertainty until more detailed lower level surveys and assessments have been carried out.
				-	The site is partially within an area of high flood risk, or at risk of surface water flooding in parts of the site. The areas of flood risk would be difficult to avoid and mitigation is likely to be expensive / difficult.
				--	The site is located wholly within an area of high flood risk or at risk of surface water flooding across the entire site.
10	Biodiversity To safeguard and enhance biodiversity and improve connectivity between green	<ul style="list-style-type: none"> ■ Protect and enhance European designated sites outside of the Borough boundaries? ■ Protect and enhance SSSIs? ■ Protect and enhance sites 	<p>The nature and significance of effects against this IA Objective will primarily relate to potential effects on designated biodiversity.</p> <p>Is the site within, adjacent to,</p>	++	Development will; deliver biodiversity gains, or improve green corridors / connections to strategic GI, or development will address a significant existing sustainability issue relating to biodiversity or geodiversity.

<p>spaces and functional habitats.</p> <p>Relevant NPPF Paragraphs: 109-125</p> <p>Relevant GCT JCS SA Objectives: 1, 16</p>	<p>recognised for their local biodiversity and geodiversity values?</p> <ul style="list-style-type: none"> ■ Lead to the loss of priority habitat(s)? ■ Disturb European Protected Species, Priority Species or Habitats upon which they depend? ■ Lead to the fragmentation of green corridors? ■ Link up areas of fragmented habitat? ■ Promote the creation of new habitats and sites of wildlife interest? 	<p>or in close proximity (200m) to any nationally designated biodiversity or geodiversity (SSSIs)? It should be noted that there are no European Designated Sites within the Borough boundary.</p> <p>Is the site within, adjacent to, or in close proximity (200m) to any biodiversity or geodiversity sites designated as being of regional (RIGS) or local importance (Key Wildlife Sites, Local Nature Reserves)?</p> <p>Is there evidence of European Protected Species or Habitats on the site?</p> <p>It is recognised that when considering the potential for effects on designated biodiversity, distance in itself is not a definitive guide to the likelihood or severity of an impact. The appraisal commentary will try to note any key environmental pathways that could result in development potentially having a negative effect on designated biodiversity that may be some distance away.</p> <p>Are there opportunities to</p>	+	Development will not lead to the loss of an important habitat, species, trees and hedgerows or lead to fragmentation of green corridors and there are potential opportunities to enhance biodiversity or geodiversity.
			0	Development at the site is not likely to have negative effects on any internationally / nationally or regionally/ locally designated biodiversity or geodiversity or contribute towards a severance of green and blue infrastructure or impede the migration of biodiversity. Potential for a residual neutral effect.
			-	Development at the site has the potential for negative effects on sites designated as being of local importance. Mitigation possible, potential for a residual neutral effect. Development at the site does not contribute to the severance of green or blue infrastructure or impede the migration of biodiversity.
			?	Element of uncertainty exists until more detailed lower level surveys and assessments have been carried out
			-	Development at the site has the potential for negative effects on sites designated as being of regional or local importance.

			<p>enhance biodiversity? Possibly improve connectivity, green / blue infrastructure or enhance an important habitat?</p> <p>Are there any opportunities to enhance geodiversity?</p>		<p>Mitigation difficult and / or expensive, potential for a minor residual negative effect.</p> <p>or</p> <p>Development at the site has the potential for negative effects on National (SSSI) designated sites and / or European protected species or habitats. Mitigation possible, potential for a minor residual negative effect.</p>
				--	<p>Development at the site has the potential for negative effects on International designated sites, or National (SSSI, NNR) designated sites and / or European protected species or habitats. Mitigation difficult and / or expensive, potential for a major residual negative effect.</p>
11	<p>Landscapes and Townscapes Protect and improve the quality of the townscape and the broader landscape setting.</p> <p>Relevant NPPF Paragraphs: 109-125</p> <p>Relevant GCT JCS SA Objectives: 5, 6, 16, 18</p>	<ul style="list-style-type: none"> ■ Protect and enhance the quality, character and distinctiveness of the townscape? ■ Protect and enhance local identities and distinctiveness? ■ Encourage well-designed, high quality development that enhances the built and natural environment? ■ Protect and enhance the Cotswolds AONB? ■ Reduce the potential for 	<p>11a) This IA Objective will address two separate issues relating to landscapes and settlement identity. The first being landscape sensitivity and the second being Green Belt land.</p> <p>The nature and significance of the effects will primarily be dependent on the landscape sensitivity of the site option.</p> <p>The Cheltenham Borough</p>	++	<p>Development significantly enhances the landscape or removes a significant eyesore and/or would regenerate previously developed land and buildings (PDL) that is currently having a major negative effect on the landscape/ townscape.</p>
				+	<p>Development would remove an eyesore, or enhance the landscape and/or would regenerate PDL that is currently having a minor negative effect on the landscape/ townscape.</p>

		<p>coalescence of Cheltenham with adjoining settlements?</p>	<p>Council sites assessment, and the Landscape Character, Sensitivity and Capacity Assessment of Cotswold AONB will inform the IA in regards to landscape sensitivity and the presence of previously developed land.</p> <p>The appraisal commentary will note if the site forms an important contribution to the character of the settlement.</p> <p>If the landscape sensitivity is not known then it is assumed that development on a greenfield site has the potential for a minor negative effect as there would be development in a previously undeveloped area.</p> <p>If the landscape sensitivity is not known then it is assumed that development on a brownfield site has the potential for a minor positive effect as it would result in the regeneration of the site.</p> <p>It is considered that there is an element of uncertainty for all sites until more detailed lower level surveys and assessments have been carried out</p>	<p>0</p> <p>?</p> <p>-</p> <p>-</p>	<p>A neutral effect is not considered possible.</p> <p>Element of uncertainty exists until more detailed lower level assessments have been carried out.</p> <p>The site option has medium sensitivity in landscape terms, and / or is within the AONB setting. Mitigation available. Potential for a minor residual negative effect.</p> <p>The site option has medium to high or high sensitivity in landscape terms and / or is within the AONB or its setting. Mitigation is likely to be difficult/ expensive. Potential for major residual negative effect.</p>
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			through planning applications. It is assumed that any Tree Preservation Orders within a site option will be retained.		
			<p>11b) This IA Objective will address two separate issues relating to landscapes and settlement identity. The first being landscape sensitivity and the second being Green Belt land.</p> <p>The nature and significance of the effects will primarily be dependent on the location of the site option within or outside of designated Green Belt land.</p> <p>The Cheltenham Borough Council sites assessment, and GIS mapping information will inform the IA in regards to the location of the site option in relation to designated Green Belt land.</p>	++	A major positive effect is not considered likely against this SA Objective.
				+	The site is not located within designated Green Belt land.
				0	A neutral effect is not considered possible
				?	There is an element of uncertainty
				-	The site option is located partially within designated Green Belt land
				--	The site option is located wholly within designated Green Belt land
12	<p>Historic Environment To protect and enhance the area's distinctive historic environment, including known and potential archaeological sites,</p>	<ul style="list-style-type: none"> Protect and where appropriate enhance nationally designated and locally important heritage assets and their settings (Conservation Areas, Listed Buildings, Registered Parks and Gardens, Scheduled 	<p>The nature and significance of the effects against this IA Objective will primarily relate to designated heritage assets and their setting. Any important non-designated heritage assets will be noted within the appraisal</p>	++	Development is likely to have a substantial positive effect on the significance of the heritage asset / historic environment or address a significant existing sustainability issue relating to culture and heritage.

<p>designated and non-designated heritage assets and their setting, in a manner appropriate to their significance.</p> <p>Relevant NPPF Paragraphs: 126-141</p> <p>Relevant GCT JCS SA Objectives: 7, 18</p>	<p>Monuments)?</p> <ul style="list-style-type: none"> ■ Protect significant archaeology? ■ Ensure appropriate archaeological assessment where there is the potential for archaeological finds? ■ Improve access to, understanding of, or enjoyment of the historic environment? 	<p>commentary.</p> <p>Are there any designated heritage assets, or their setting, that could be effected within or adjacent to the site?</p> <p>Are there any opportunities to enhance culture or heritage assets, such as; securing appropriate new uses for unused Listed Buildings; the removal of an eyesore</p>		
			+	Development has the potential for minor positive effects as it may secure appropriate new uses for unused Listed Buildings; enhance the setting of or access / signage to designated assets.
			0	Development will have no significant effect. This may be because there are no heritage assets within the influence of proposed development or that mitigation measures are considered sufficient to address potential negative effects with the potential for a residual neutral effect.
			?	Element of uncertainty exists until more detailed lower level surveys and assessments have been carried out.
			-	Development has the potential for a minor negative effect on a Conservation Area, Scheduled Monument, Listed Building, Registered Battlefield and Registered Historic Parks and Gardens and/or their setting. Even once avoidance and mitigation measures have been considered there is still the potential for a

					residual minor negative effect.
				--	Development has the potential for a major residual negative effect on a Conservation Area, Scheduled Monument, Listed Building, Registered Battlefield and Registered Historic Parks and Gardens and/or their setting. Mitigation difficult and / or expensive.
13	Cultural Heritage To protect and enhance the area's distinctive qualities that form part of the attraction to and fondness for the area. Relevant NPPF Paragraphs: 126-141 Relevant GCT JCS SA Objectives: 7, 18	<ul style="list-style-type: none"> ■ Protect and enhance the retail attractions of the town? ■ Protect and enhance opportunities for cultural events, including Cheltenham Races, Festivals, Arts, and Cultural events? ■ Protect and enhance the character of the immediate and wider area? ■ Provide opportunities for new attractions or events? 	The nature and significance of the effects against this IA Objective will primarily relate to cultural heritage assets and their settings e.g. Cheltenham Racecourse.	++	There is evidence to suggest that development at the site option will have a significant positive effect on cultural heritage.
				+	There is evidence to suggest that development at the site option will have a positive effect on cultural heritage.
				0	Evidence suggests that development is unlikely to result in any significant effects, or there is mitigation available to reduce negative effects, with the potential for a residual neutral effect,
				?	There is an element of uncertainty, or evidence is unavailable at this stage.
				-	There is evidence to suggest that development at the site option will have a minor negative effect on cultural heritage.

				--	There is evidence to suggest that development at the site option will have a significant negative effect on cultural heritage.
14	<p>Land and Soils Minimise the use of natural resources including soil and greenfield land, protect safeguarded mineral resources, and soil quality.</p> <p>Relevant NPPF Paragraphs: 28, 93-125, 142-149</p> <p>Relevant GCT JCS SA Objectives: 5, 6, 9</p>	<ul style="list-style-type: none"> ■ Result in the loss of greenfield land? ■ Protect best and most versatile agricultural land? ■ Encourage redevelopment of previously developed land? ■ Safeguard and protect strategic or important mineral deposits for future use? ■ Avoid the sterilisation of mineral resources? ■ Improve / remediate contaminated land? ■ Minimise the volume of waste created during construction? ■ Minimise the volume of waste created during occupation? ■ Maximise reuse, recycling and composting of waste? 	<p>It is assumed that any development has the potential to ensure sustainable waste management.</p> <p>It is assumed that any development on a contaminated site will ensure appropriate remediation prior to development.</p> <p>It is considered that the nature and significance of the effects against this IA Objective will primarily relate to the loss of best and most versatile agricultural land, and the presence of allocated or safeguarded mineral deposits.</p> <p>If there is uncertainty with regard to the agricultural land classification for a site option then a precautionary approach will be taken, i.e. if the evidence indicates that a site option is Grade 3, but no distinction is made between 3a and 3b, it will be assumed that development at the site will lead to the loss of Grade 3a agricultural land.</p>	++	Development at the site option will not hinder future access to minerals or result in the loss of any agricultural land. Development will remediate contaminated land.
				+	Development at the site option will not hinder future access to minerals or result in the loss of best and most versatile agricultural land.
				0	A neutral effect is not considered possible.
				?	An element of uncertainty exists until more detailed lower level surveys and assessment have been carried out through planning applications.
				-	Development at the site option would either result in; the loss of best and most versatile land or an area allocated/ safeguarded for minerals.
				--	Development at the site option would result in the loss of best and most versatile land and is within an area allocated/ safeguarded for minerals.

Appraising the Cheltenham Plan

- 2.8 The Vision for the Cheltenham Plan was appraised against the IA objectives for sustainable development. A compatibility analysis of the Plan Vision & Objectives with the IA objectives was undertaken and the findings reported here in summary in Section 5 with the detailed analysis provided in Appendix VI.
- 2.9 Each potential non-strategic site option was appraised against the full IA Framework of objectives, decision-aiding questions and thresholds of significance using professional judgment and the baseline evidence. Where possible and appropriate, specified qualitative and quantitative thresholds were used to define the five categories of significance of effects (major and minor negative; neutral; major and minor positive). The assessment of effects considered the nature of the likely sustainability effects, including positive/negative; short-medium term (5-10 years)/long term (10-20 years plus); permanent/temporary; direct/indirect; cumulative and synergistic, were described in accordance with Schedule 2 of the SEA Regulations.
- 2.10 An appraisal commentary was provided on how the potential options would progress SA objectives, and where appropriate, recommendations for enhancement of positive effects and mitigation of negative effects were provided. Detailed IA matrices for site allocation options are provided in Appendix VII of this IA Report and summary findings are set out in Sections 4 and 5. Where uncertainty or gaps in information were apparent, this was recorded.
- 2.11 The IA of the Cheltenham Plan, including policies, is structured under sustainability themes/topic headings, which have been linked to the Objectives in the IA Framework as well as the suggested topics in the SEA Directive. This provides a framework and structure to evaluate the likely significant effects of the Cheltenham Plan. The appraisal has considered each aspect of the emerging Plan (policies and site allocations) as well as the interrelationships between topics and cumulative/synergistic effects of the implementation of the Plan as a whole.
- 2.12 Integrated Appraisal is informed by the best available information and data. However data gaps and uncertainties exist and it is not always possible to accurately predict effects at the plan level. For example, specific significance of effects on biodiversity, heritage assets, or changes to local level traffic flows may depend on more detailed studies and assessments that are more appropriately undertaken at the next stage of planning - at the project or site level. Climate change impacts are difficult to predict as the effects are most likely to be the result of changes at a cumulative and regional or national level, and therefore a precautionary approach that seeks to deliver best practice mitigation and adaptation is the most appropriate approach.

Consultation

- 2.13 The SEA Directive and Regulations require early and effective public consultation. The development of the Draft Cheltenham Plan has been subject to statutory and public consultation since early preparation in 2013 with the plan scoping. The SA Scoping Report was subject to statutory consultation with the environmental bodies (Environment Agency, Historic England, Natural England) and also available on the Council's website. The IA Report accompanied the Preferred Options Plan on consultation from 6 February to 20 March 2017.
- 2.14 This IA Report will accompany the Cheltenham Plan on Regulation 19 consultation, including the SEA statutory consultees, stakeholders, and the public. Any comments received on the IA, and responses made, will be taken into consideration and reported in the Final IA Report that will accompany the Submission Cheltenham Plan for submission to the Secretary of State for independent examination – likely to be some time in the spring of 2018.

3.0 SUSTAINABILITY CONTEXT, OBJECTIVES & BASELINE CHARACTERISTICS

Introduction

- 3.1 The IA scoping process was undertaken and presented in the Draft Scoping Report (June 2015). Comments were received from five consultees and minor amendments and additions to information were made and reported in the finalised IA Scoping Report (attached as Appendix II). The detailed review of relevant plans and programmes and baseline information was included in the Draft Scoping Report (June 2015) as Appendices I and II, and further attached to this IA Report as Appendices III and IV.
- 3.2 This Section provides a summary of the review of relevant plans and programmes and baseline information as well as the key issues and opportunities for sustainable development and spatial planning that were identified as a result of such studies.

Review of Relevant Plans and Programmes (PPs)

- 3.3 In order to establish a clear scope for the IA of the Cheltenham Borough Local Plan Part 1 (Cheltenham LP) it is necessary (and a requirement of the SEA Directive) to review and develop an understanding of the wider range of “policies, plans, programmes and sustainability objectives”¹⁹ that are relevant to the Plan. This includes International, European, National, Regional and local level policies, plans and strategies. Summarising the aspirations of other relevant policies, plans, programmes and sustainability objectives promotes systematic identification of the ways in which the Cheltenham LP could be influenced by - and help to fulfil them. A detailed analysis of the relevant PPs are provided in this IA Report in Appendix IV and the key relevant plans and programmes are summarised in the paragraphs following:
- 3.4 The National Planning Policy Framework (NPPF, 2012) is the overarching policy framework for the delivery of sustainable development across England, and is underpinned by a presumption in favour of sustainable development. The purpose of the planning system is to contribute to the achievement of sustainable development. The National Planning Policy Framework²⁰ (paragraph 7) states that: “There are three dimensions to sustainable development - economic, social and environmental - which give rise to the need for the planning system to perform a number of roles”.
- 3.5 The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS)²¹, 2017 sets the level of development that the Cheltenham Plan should plan for, identifying the need and location for housing, employment and supporting infrastructure, as well as a policy framework to guide the delivery of new development up to 2031. The JCS provides the high level strategic policies

¹⁹ <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans/>

²⁰ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

²¹ <https://jointcorestrategy.org/home>

and allocations for the JCS area; the Cheltenham Plan supports this framework with more detailed, locally-specific planning policies and non-strategic allocations for development.

- 3.6 The Cotswolds AONB Management Plan 2013-18 sets the policy framework for the management of the Cotswolds AONB with a vision for the Cotswolds to be a landscape that; retains its visual unity and scenic diversity, is richer in nature, where historic heritage is conserved, is home to vibrant communities supported by a sustainable local economy, and which provides a high-quality experience for everyone. The potential cumulative effects of the Cheltenham LP on the AONB is an important consideration for the IA.
- 3.7 The JCS Green Infrastructure (GI) Strategy (2014²²) focuses on connectivity and water, with a vision where anyone in an urban area can walk out of their home or workplace and by going through a series of interconnected green spaces emerge into the strategic GI of the River Severn and its washlands or the Cotswolds AONB. The protection and enhancement of green and blue infrastructure is an important consideration for the IA.
- 3.8 The Minerals Local Plan for Gloucestershire²³ (2018-32 yet to be adopted) sets the framework for determining planning applications for minerals development. The Strategy identifies sites for minerals extraction, which should be considered when assessing potential housing or employment allocations which may be on or in close vicinity to the identified minerals sites.
- 3.9 The Gloucestershire Waste Core Strategy²⁴, 2012-2027 explains how the County Council and its partners will address the issue of planning for waste management in Gloucestershire in the period 2012-2027. The core strategic objectives include; waste reduction; re-use, recycling and composting; other recovery (including energy recovery); waste disposal; and minimising impacts.
- 3.10 The Gloucestershire Local Transport Plan²⁵, 2015-2031 overarching objectives are: to support sustainable economic growth; to enable community connectivity; to conserve the environment; and to improve community health and wellbeing.
- 3.11 The GFirst Local Enterprise Partnership, Strategic Economic Plan for Gloucestershire²⁶, 2014 seeks to grow the economy by 2022 to drive growth of 4.8% GVA per annum, averaged over the period of the plan. To achieve the growth potential, the Plan proposes a Growth Zone, a Growth Hub and a centre of excellence in renewable energy, engineering and nuclear skills.

²² <https://jointcorestrategy.org/green-infrastructure-study/>

²³ <http://www.gloucestershire.gov.uk/planning-and-environment/planning-policy/minerals-local-plan-for-gloucestershire/emerging-minerals-local-plan-for-gloucestershire-2018-2032/>

²⁴ <http://www.gloucestershire.gov.uk/planning-and-environment/planning-policy/gloucestershire-waste-core-strategy/>

²⁵ <http://www.gloucestershire.gov.uk/transport/gloucestershires-local-transport-plan-2015-2031/>

²⁶ <http://www.gfirstlep.com/about-us/our-vision/strategic-economic-plan/>

- 3.12 The Gloucestershire Health and Wellbeing Strategy²⁷, 2012-2032 aspiration of the Strategy is to continue to improve the quality of life for everyone in Gloucestershire within available resources, and the strategy spans 20 years with the plan to be implemented through three-year action plans that are refreshed annually, enabling the measurement of progress in the short, medium and longer term. The Strategy uses the life-course approach of; starting well, developing well, living and working well, and ageing well, and sets aspirations for each of these life stages. Health and well-being is linked to a number of different issues, such as access to open space and adjacent land uses, and is an important consideration for the IA.
- 3.13 Cheltenham Borough Council Strategic Flood Risk Assessment (SFRA Level 1, 2007 & Level 2²⁸, 2011). The assessment maps all forms of flood risk in the Borough. The assessment can also assist in determining which areas within the Borough require further flood risk assessment prior to any development.
- 3.14 Cheltenham Borough Council Landscape Character, Sensitivity and Capacity Assessment of Cotswold AONB, 2015. The assessment looks at reasonable site options that lie within or adjacent to the AONB, and provides information on the character, sensitivity and capacity of each site.
- 3.15 Cheltenham Borough Council Local Green Spaces Study Report, 2015. The study, through consultation with local communities, identifies 29 sites that could be considered for inclusion in the emerging Cheltenham LP as designated Local Green Spaces. Locally valued green spaces is an important consideration for the IA.
- 3.16 Cheltenham Borough Council Air Quality Action Plan²⁹, 2014. This sets out a number of actions that if implemented could have a positive impact on air quality within Cheltenham, and contribute to the reduction of emissions in areas that currently fail to meet the air quality objective for nitrogen dioxide. The effects of development on air quality will be an important consideration for both the Cheltenham LP and IA as the whole Borough is currently a designated Air Quality Management Area.
- 3.17 Cheltenham Economic Strategy: Developing Cheltenham as a Business Location, 2015. The strategy outlines key priorities and objectives for Cheltenham's economic strategy with delivery ideas and options. The Cheltenham Plan can ensure that development achieves high design standards to help attract further inward investment.

Baseline Conditions

- 3.18 The SEA Directive requires the collation of baseline information to provide a background to, and evidence base for, identifying sustainability problems and opportunities in the plan area and to provide the basis for predicting and monitoring effects of the plan. In order to make judgments about how the

²⁷ http://www.gloucestershire.gov.uk/media/2941/joint_health_and_wellbeing_strategy-56736.pdf

²⁸ https://www.cheltenham.gov.uk/downloads/download/1037/strategic_flood_risk_assessment_level_2

²⁹ https://www.cheltenham.gov.uk/downloads/file/3780/air_quality_action_plan_2014

Cheltenham Plan will progress sustainable development, it is essential to understand the economic, environmental and social circumstances in the Borough today and their likely evolution in the future. The aim is to collect only relevant and sufficient data on the present and future state of the Borough to allow the potential effects of the Cheltenham Plan to be adequately predicted.

- 3.19 The SA/ SEA Guidance provided by Government³⁰ proposes a practical approach to data collection, recognising that information may not yet be available and that information gaps for future improvements should be reported as well as the need to consider uncertainties in data. Collection of baseline information should be continuous as the IA process informs plan making and as new information becomes available. A summary of the collated baseline information is provided below with a description of the current situation. The detailed baseline information is presented in Appendix III of this IA Report – and this also details the likely evolution of the baseline without the Plan for each of the topics.

Water: Resources, Quality and Flooding

- 3.20 The Rivers Swilgate and Chelt within the Borough are of poor ecological quality and Hatherley Brook is of moderate ecological quality. The River Swilgate has good chemical quality, however the Hatherley Brook fails on its chemical quality status against the Environmental Quality Standards Directive 2008/105/EC. The River Chelt has not been assessed for its chemical quality. The baseline information has shown that the quality of these rivers and groundwater bodies in the Borough are unlikely to meet the requirements of the Water Framework Directive³¹ to be at *good status* by 2015; however, the Severn River Basin Management Plan³² predicts that 34% of surface waters will be at good or better ecological status or potential and 65% of groundwater bodies will be at good status by 2015. Key issues for water quality include; point source pollution from water industry sewage works; physical modification of water bodies; and diffuse pollution from urban sources.
- 3.21 Cheltenham is in the Severn Trent water supply area, within the Strategic Grid Water Resource Zone which requires significant investment over the next 25 years, as a result water efficiency in development becomes a vital factor in mitigating the expected loss in deployable output.
- 3.22 There are 9 main rivers in the Borough, of relevance is the River Chelt flowing through the centre of Cheltenham and regulated by a flood alleviation scheme. Flood risk is influenced by surface water and the overloading of the old drainage system. The Strategic Flood Risk Assessment indicates that a large proportion of any rain falling becomes runoff even when the soil is not saturated. The high degree of urbanisation coupled with the small size of catchments and impermeable underlying rock mean that the greatest flood

³⁰ Department for Communities and Local Government (2014) National Planning Practice Guidance - Strategic Environmental Assessment and Sustainability Appraisal. Online at <http://planningguidance.planningportal.gov.uk/blog/guidance/>

³¹ Directive 2000/60/EC establishing a framework for the Community action in the field of water policy

³² <https://www.gov.uk/government/publications/severn-river-basin-district-river-basin-management-plan>

risk in the region is from high-intensity convective storms. Effective Sustainable Drainage Systems will be a vital factor in future development in the Borough, and the Cheltenham Plan has potential for positive effects by helping to address existing surface water flooding issues or by helping to reduce the risk of flooding.

Biodiversity: Fauna and Flora

- 3.23 There are no European designated biodiversity sites within the Borough. The Borough includes part of Leckhampton Hill and Charlton Kings Common SSSI, and is adjacent to a further four SSSIs. The area of the Leckhampton SSSI that falls within the Borough boundary contains areas that have been assessed as 'unfavourable recovering' and 'unfavourable declining'. The Cheltenham Plan can seek improvements to this biodiversity site to contribute to achieving a favourable status. The Borough also contains a designated Local Nature Reserve (Griffiths Avenue) and an urban nature reserve (Pilley Bridge), as well as eight Key Wildlife Sites. Cheltenham Borough Council is seeking to upgrade all their nature reserves to Local Nature Reserve designation status.

Cultural Heritage

- 3.24 The Borough contains highly valued heritage assets including; 7 Conservation Areas, 2 Registered Parks & Gardens, 6 Scheduled Monuments and over 2602 Listed Buildings. Of the Listed Buildings two are on the 'Heritage At Risk Register'; The Church of St Mark, Church Road and the Church of St Luke, College Road. The Cheltenham LP can seek development that contributes to improving their condition. There is also an Index of Buildings of Local Interest which serves to protect locally important buildings that do not meet the strict criteria for statutory listing but nevertheless make a special local contribution to the history, appearance, character and cultural value of Cheltenham. The index contains around 450 buildings and structures. Further to this there are 6 sites of archaeological remains within the Borough which are also designated as scheduled Monuments. The lower end of the High Street is also recognised as an archaeologically sensitive area. The Borough has strong cultural heritage values which were highlighted in the Cheltenham LP scoping responses³³ as highly valued by residents. Cultural aspects include; Cheltenham Racecourse, Sports Facilities, Events and various music, arts and science festivals.

Landscape and Visual Amenity

- 3.25 A significant part the Borough (22%) lies within the Cotswolds Area of Outstanding Natural Beauty (AONB). The AONB extends into southern and eastern edges of the town, as well as the parishes of Charlton Kings and the south east of Leckhampton. The AONB therefore is likely to come under pressure from housing development needs, and the sensitivity of this landscape area will be an important consideration for the Cheltenham LP. The Borough comprises of the Severn and Avon Vales National Character

³³ Cheltenham Borough Council (2013) Cheltenham Plan Scoping Documentation [online] http://www.cheltenham.gov.uk/downloads/file/3578/summary_report [accessed June 2015]

Area (NCA) and the Cotswolds NCA. The majority of the Severn and Avon Vales area is used for agriculture in a predominantly open landscape. The Cotswolds are characterised by patterns of steep scarp crowned by high, open wold, where expansive views across the Severn and Avon Vales exist. Settlements in the Cotswolds are also characterised by the use of local limestone in buildings and walls. Centrally the town is largely an urban townscape noted for its Regency architecture.

- 3.26 17% of the land within the Borough is also designated Green Belt land seeking to prevent the coalescence of Cheltenham with both Gloucester and Bishop's Cleeve.
- 3.27 A consultation process with local communities undertaken identified 29 sites within the Borough to be put forward for Local Green Space designation in the emerging Cheltenham Plan. The evidence indicates that Pittville Park is the most used green space within the Borough, and that the overall quality of all green spaces in the Borough is of a good standard. Green infrastructure improvements / opportunities have been identified in the GCT JCS for Hatherley Brook, Kingham Dismantled Railway Line, River Chelt, Wyman's Brook, the Honeybourne Line and strategic cycle ways / Sustrans routes.

Energy and Climate Change

- 3.28 There is a decreasing trend in carbon dioxide emissions since 2005 within the Borough, and the biggest contributor of emissions is the industrial and commercial sector, closely followed by domestic and then transport. In 2012, the Borough had a total renewable energy capacity of 4.1 MW. Renewable energy capacity is lower in Gloucestershire than most other local authorities in the South West. There is much room for improvement in renewable energy provisions. Although energy consumption rates have decreased since 2005 they are still generally higher than averages across the South West and England for both electricity and gas.

Air Quality

- 3.29 The whole of Cheltenham Borough is a designated Air Quality Management Area (AQMA). Most nitrogen dioxide emissions are from road traffic exhaust emissions. There are five key areas within the Borough where nitrogen dioxide levels exceed air quality objectives:
- High Street – Bath Road; a reduction of 24% is required
 - Swindon Road – St Georges Street Junction; a reduction of 17% is required
 - Fairview Road – Winchcombe Street Junction; a reduction of 8% is required
 - London Road – Hales Road Junction; a reduction of 19% is required
 - High Street (Western End) – Junction with Gloucester Road; a reduction of 14% is required.

Infrastructure, Transport and Accessibility

- 3.30 The Borough has high rates of residents who travel to work by car, higher than national averages. There is also a higher than national average number of people who work from home, and number of people who cycle or walk to work. The M5 motorway is the busiest route in the County, carrying up to 90,000 vehicles a day, and there are further three main roads that pass through the Borough; the A40 London / South Wales route; the A46 / B4632 Coventry / Bath Road; and the A435 Evesham / Cirencester Road.
- 3.31 As Cheltenham is largely an urban area, daytime bus services within the Borough operate on a commercial basis (without the need for subsidy), and are largely more accessible than found in the surrounding rural areas. Cheltenham railway station is located within the Borough boundary and its' main routes include Gloucester, London, Birmingham and Bristol. There is also Gloucestershire Airport located in Tewkesbury Borough between Gloucester and Cheltenham. The civil airport is relatively small, but has customs facilities for flights to the continent. Constraints formed by surrounding development mean that Gloucestershire Airport is unlikely to significantly expand operations during the Transport Plan period. Therefore, the focus for commercial air travel to and from Gloucestershire will continue to be on the major airports located in the South East, West Midlands and at Bristol and Cardiff. The local cycle path network includes some traffic-free Sustrans routes connecting Cheltenham to Gloucester.
- 3.32 The Local Transport Plan³⁴ identifies through an Access Matrix that the majority of Cheltenham Borough has good accessibility rankings, however accessibility scoring decreases in the more rural areas in the south east of the Borough within the Cotswold AONB.

Land, Minerals and Waste

- 3.33 Some of the geology of the area impedes drainage or is slowly permeable which can contribute to flood risk. There is limited agricultural land within the Borough, as to be expected as it is predominantly an urban area. Small pockets of best and most versatile agricultural land exist in Leckhampton, Prestbury and adjacent to Kingsditch Industrial Estate. The area overlies Jurassic Limestone deposits, however there are no minerals allocations or safeguarded sites within the Cheltenham LP area.
- 3.34 In 2012, 87.2% of new housing development was located on previously developed land, there is only one site within the Borough that has been identified on the public register of contaminated land, and this site has since been remediated.
- 3.35 Waste is managed at the County level, and Municipal Solid Waste (MSW) and hazardous waste has been increasing since 2000. There are local recycling banks, generally located within car parks and supermarkets. There is a Materials Recovery Facility (MRF) at Moreton Valence (Gloucester), and

³⁴ Gloucestershire County Council (2011) Gloucestershire's Local Transport Plan 2011-26 [online]

planning permission for another MRF has been granted at Wingmoor Farm East (Tewkesbury). Wingmoor Farm also houses non-hazardous and hazardous waste landfill sites. There are currently 84 operational waste water treatment facilities in Gloucestershire, with major facilities at Netheridge (west of Gloucester) and Hayden (south west of Cheltenham)³⁵.

Housing

- 3.36 Recent trends indicate an increase in housing delivery, and a need for at least 10,917 new homes in the Borough in the period up to 2031. The average sale prices of housing over the last five years are; £247,856 for a terraced property; £280,455 for a semi-detached house; £495,251 for a detached house; and £193,226 for a flat, creating an overall average house price of £311,502. Affordable housing provision has fallen in the three years leading to 2010, which places pressure on existing housing to meet local needs. Over the period April 2006 to April 2011 the town delivered 2,100 new homes, with an average annual delivery of 430 dwellings. The current housing needs assessment estimates a requirement of 929 new affordable homes to be delivered every year. Housing need in Cheltenham is therefore more than twice as high as the actual supply of all new homes. The delivery of affordable housing in the Borough will be a crucial consideration for the Cheltenham Plan.
- 3.37 There is one authorised Gypsy and Traveller site within the Borough, which consists of one household, with two pitches. The 2007 GTAA identified the need for four pitches, however Cheltenham is largely seen as an unfavourable location for Gypsies and Traveller due to its urban nature; rural sites are favoured as they are better placed to meet Gypsy and Traveller needs (e.g. grazing for horses).

Healthy Communities and Equality

- 3.38 In 2011 Cheltenham had 115,732 usual residents, approximately 2.2% of the population of the South West, and there are slightly more females than there are males. The census data shows that the Borough had a population density of 24.8 people per hectare in 2011. The population has been steadily increasing from 110,013 residents in 2001. The majority of the resident population are white, with smaller ethnic groups of mixed races, Asian, Black and Arab communities³⁶.
- 3.39 The health of residents is generally better than the England average. Deprivation is lower than average, however about 15.2% (2,900) of children live in poverty. Life expectancy for both men and women is higher than the England average. In the most deprived areas of the Borough, life expectancy is reduced by 9.2 years for men and 7.3 years for women, reflecting the inequalities present.

³⁵ Gloucestershire County Council (2012) Gloucestershire Waste Core Strategy (WCS) [online]]

³⁶ ONS (2011) Datasets for Cheltenham Local Authority [online]

Economy, Employment and Education

- 3.40 In 2013-14 85.5% of the working population of Cheltenham Borough were economically active, a significant decrease from 89.2% in 2007, and as such the unemployment rate (economically active but unemployed) has risen from 3.2% in 2007 to 4.6% in 2013/14, though this remains lower than the national average of 6.8%. The largest employment sector for Cheltenham residents in 2014 is in professional and senior occupations (58.4%), followed by administrative and skilled trades (19%). The statistics show that the majority of businesses within the Borough are within the service industry, and average weekly earnings are higher in the Borough than found in the South West, but lower than the Great Britain average.
- 3.41 In 2014, 50.5% of residents obtained skill levels of NVQ4 or higher, which is higher than the national average of 36%. Less than 1% of residents were identified in 2014 as having no qualifications, which is significantly lower than the national average of 8.8%. There are 74 educational establishments within the Borough including special schools, community schools, voluntary controlled schools, and independent schools. The University of Gloucestershire is located across 3 sites, 2 of which are in Cheltenham and one in Gloucester.

Key Sustainability Issues, Problems and Opportunities

- 3.42 The key sustainability issues that were identified during the IA Scoping stage are summarised in Table 3.1 below.

Table 3.1: Key Sustainability Issues, Problems & Opportunities

Key Sustainability Issues, Problems & Opportunities
<ul style="list-style-type: none"> ■ Maintaining and where appropriate, improving the quality of water bodies in the Borough (particularly the Rivers Chelt, Swilgate and Hatherley Brook) ■ Reducing the demand for water resources ■ Reducing the risk of flooding, particularly from surface water runoff, in new development and the impacts of flooding on existing development ■ Protecting and enhancing biodiversity where possible and required by legislation, and creating connections between existing and new GI and biodiversity sites ■ Maintaining and enhancing green/blue corridors to support the movement of people and biodiversity ■ Valuing local participation and responding to local views (e.g. designating locally valued green spaces identified through consultation, in the emerging Plan) ■ The sensitivity of historic environment ■ The promotion and enhancement of the cultural heritage of Cheltenham ■ Protecting and enhancing designated and non-designated heritage assets and their settings, including archaeology ■ Protecting and enhancing the landscape, in particular the Cotswolds AONB and its setting ■ Protecting limited agricultural land supplies in the Borough ■ Promoting development on previously developed land

- Protecting the Green Belt to avoid the coalescence of Cheltenham with Gloucester and Bishop's Cleeve
- Improving air quality in the Borough
- Promoting and increasing renewable energy generation capacity in the Borough as well as a continued decrease in energy consumption
- Ensuring communities can access key services, facilities, green/open space, and employment opportunities by sustainable modes of transport
- Reducing the demand for the private vehicle
- Reducing the impacts of development on the road network and on road capacity
- Maintaining and improving walking and cycle routes through the Borough
- Delivering a mix of housing, and delivering affordable housing, to avoid the exacerbation of existing inequalities in the Borough
- Reducing existing inequalities
- Supporting the retention of existing businesses, and promoting inward investment
- Creating new job opportunities and reducing the rate of economic inactivity
- Maintaining and enhancing high educational attainment levels found in the Borough

The Likely Evolution of the Baseline Without the Plan

- 3.43 Without the Plan, there would be no coordinated approach to planning and managing new development with likely negative effects on environmental factors. The identified housing and employment needs may not be delivered – and not in the most sustainable locations. Opportunities for enhancing community services and green infrastructure are unlikely to be progressed in an effective manner.

Updating the Baseline

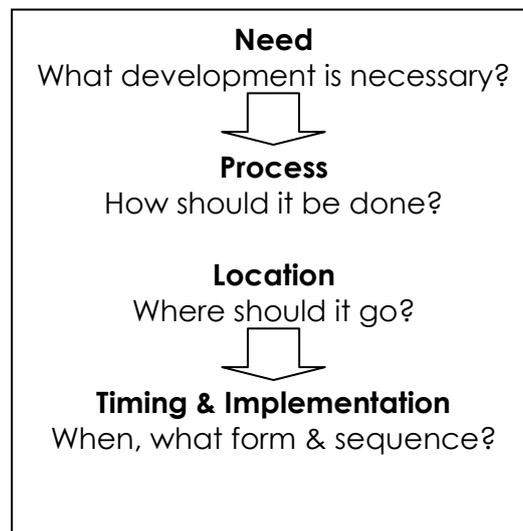
- 3.44 The IA shares the evidence base with the plan-making – and in accordance with Government advice. Any available updated information was considered in the updating of the IA, including the EqIA and the HRA.

4.0 CONSIDERATION OF PLAN-MAKING OPTIONS AND ALTERNATIVES IN IA

Assessment of Alternatives in SA/SEA

- 4.1 The EU SEA Directive³⁷ requires assessment of the likely significant effects of implementing the plan and “reasonable alternatives” taking into account “the objectives and geographical scope” of the plan and the reasons for selecting alternatives should be outlined in the Report. The Directive does not specifically define the term “reasonable alternative”; however, UK SA/SEA guidance³⁸ advises that it should be taken to mean “realistic and relevant” i.e. deliverable and within the timescale of the plan.
- 4.2 Extant SEA guidance³⁹ sets out an approach and methods for developing and assessment of alternatives. This includes acknowledgement of a hierarchy of alternatives that are relevant and proportionate to the tiering of plan-making. Alternatives considered at the early stages of plan-making need not be elaborated in too much detail so that the “big issues” are kept clear; only the main differences between alternatives need to be documented i.e. the assessment should be proportionate to the level and scope of decision-making for the plan preparation. The hierarchy of alternatives may be summarised in the following diagram:

Figure 4.1: Hierarchy of Alternatives in SA/SEA and Options in Plan-Making



- 4.3 Case law in England has clarified and provided further guidance for current practice on how alternatives should be considered in SA/SEA of spatial and land use plans. The Forest Heath Judgment⁴⁰ confirmed that the reasons for selecting or rejecting alternatives should be explained, and that the public should have an effective opportunity to comment on appraisal of

³⁷ <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

³⁸ <https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance>

³⁹ <http://www.pas.gov.uk/pas/core/page.do?pagelid=152450>

⁴⁰ Save Historic Newmarket Ltd v Forest Heath District Council (2011) EWHC 606

alternatives. The SA report accompanying the plan must refer to, summarise or repeat the reasons that had been given in earlier iterations of the plan and SA, and these must still be valid.

- 4.4 The Broadlands Judgment⁴¹ drew upon the Forest Heath findings and further set out that, although not an explicit requirement in the EU SEA Directive, alternatives should be appraised to the same level as the preferred option; the final SA Report must outline the reasons why various alternatives previously considered are still not as good as the proposals now being put forward in the plan, and must summarise the reasons for rejecting any reasonable alternatives - and that those reasons are still valid. The Rochford Judgment⁴² confirmed that the Council had adequately explained how it had carried out the comparative assessment of competing sites and that any shortcomings in the early process had been resolved by the publication of an SA Addendum Report.

Assessment of Options in Plan-Making

- 4.5 Development planning issues, such as how much, what kind of development and where, are considered within the requirements of legislation and policy together with the characteristics of the plan area and the views of its communities. Potential options for resolving such issues are identified by the Councils through various studies, such as population projections and housing need, community strategies, infrastructure capacities, and environmental constraints analysis – and through consultation with the regulators, the public, businesses, service providers, and the voluntary sector.
- 4.6 At the earlier and higher levels of strategic planning, options assessment is proportionate and may have a criteria-based approach and/or expert judgment; the focus is on the key differences between possibilities for scale, distribution and quality of development. At this early stage, the options presented may constitute a range of potential measures (which could variously and/or collectively constitute a policy) rather than a clear spatial expression of quantity and quality. Each option is not mutually exclusive and elements of each may be further developed into a preferred option. As a plan evolves, there may be further consideration of options that have developed by taking the preferred elements from earlier options. Thus the options for plan-making change and develop as responses from consultation are considered and further studies are undertaken.
- 4.7 At the later and lower levels of development planning for site allocations, options assessment tends to be more specific, often focused on criteria and thresholds, such as land availability, accessibility to services and impacts on local landscape, and particularly informed by technical studies such as the Strategic Housing Market Assessment (SHMA), the Strategic Housing Land Availability Assessment (SHLAA), and Strategic Flood Risk Assessment (SFRA). There is a hierarchy of options assessment, with sites that are not viable or

⁴¹ Heard v Broadland District Council, South Norfolk District Council, Norwich City Council (2012) EWHC 344

⁴² Cogent Land LLP v Rochford District Council (2012) EWHC 2542

deliverable or which might have adverse effects on protected environmental assets, rejected at an early stage.

- 4.8 The role of the IA is to inform a Council in their selection and assessment of options; IA is undertaken of those reasonable alternatives (options) identified through the plan-making process. The findings of the IA can help with refining and further developing these options in an iterative and ongoing way. The IA findings do not form the sole basis for decision making – this is informed also from planning and other studies, feasibility, and consultation feedback.

The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy & the Cheltenham Plan

- 4.9 Different options for accommodating proposed growth in the Gloucester, Cheltenham and Tewkesbury local authority areas have been considered and variously subject to SA/SEA and consultation since early Joint Study Area studies in 2004-6, through iterations of the emerging Joint Core Strategy 2009-2013 and Submission in 2014, and continuing during the Examination stages 2015-2016 and to Main Modifications in 2017.
- 4.10 The approach that has been taken to options identification, refinement and appraisal is explained in the GCT JCS SA Report⁴³ (sections 4-8, 2014) that accompanied the JCS on submission (November 2014) to the Secretary of State for examination. This includes the SA findings and the reasons for selecting or rejecting alternatives in the wider JCS area and the Cheltenham Borough area. Consideration of options was discussed during the Examination of the JCS and this included reflection on the proposed Strategic Site Allocations (Policy SA1) to meet Cheltenham's identified need for new development. Details are provided in the Inspector's Interim Report⁴⁴ (May 2016) and the SA Addendum Report (September 2016) that accompanied the proposed Main Modifications to the JCS on consultation in October 2016.
- 4.11 Doing nothing is not a reasonable alternative for the Cheltenham Plan since a strategy with locally relevant Policies and local (non-strategic) site allocations is required to avoid negative effects and ensure a sustainable delivery of the required development in the Cheltenham area and as identified in the JCS (Policies SP1 & 2)⁴⁵.
- 4.12 There is limited possibility for investigating strategic options through the Cheltenham Plan. The Strategy and Development Principles are underpinned by a City Centre first approach that has developed over considerable time and study with the JCS, including testing through SA. Local development opportunity options were considered through public consultation in June 2015 with the Issues & Options stage of plan preparation and Sustainability Appraisal.

⁴³ <http://www.gct-jcs.org/SustainabilityAppraisal/>

⁴⁴ <http://www.gct-jcs.org/>

⁴⁵ Ibid

- 4.13 The plan-making and SA/SEA processes have identified and refined the reasonable options (suitable and deliverable) available for possible allocation as local sites in the Cheltenham Plan. These have been tested through the SA/SEA process and details are provided in this IA Report at Appendix VII. An outline of the reasons for selection or rejection of options is also reported in this IA Report in Section 5 (Table 5.1) and discussed in Section 6, and in accordance with requirements of the SEA Regulations.

5.0 INTEGRATED APPRAISAL OF THE CHELTENHAM BOROUGH LOCAL PLAN PART 1 PREFERRED OPTIONS (October 2016)

Vision and Objectives

- 5.1 The detailed Cheltenham Plan (Part One Preferred Options, 2016) Vision Themes are compatible with the IA Objectives. In particular, the Theme A Vision is highly compatible with IA Objectives relating to housing, settlement infrastructure and settlement connectivity, the Theme B Vision is highly compatible with IA Objectives relating to the economy and education, and the Theme C Vision is highly compatible with IA Objectives relating to environmental considerations. The Vision Themes are all also compatible with IA Objectives to reduce inequalities and support health and wellbeing. No significant incompatibilities were identified, and no IA recommendations were made the Vision Themes.
- 5.2 The Objectives of each Theme were found to be compatible with at least one of all of the IA Objectives, and as such will contribute to sustainable development to a certain extent. Theme A Objectives were found to be highly compatible with IA Objectives relating to the provision of housing, employment and infrastructure. Theme B Objectives were found to be highly compatible with IA Objectives relating to the economy, employment and education. Theme C Objectives were found to be highly compatible with IA Objectives relating to the protection and enhancement of the natural environment and the promotion of healthy lifestyles. Theme A, B and C Objectives were all found to be compatible with IA Objectives to reduce inequalities and support health and wellbeing. No significant incompatibilities were identified.
- 5.3 Some of the Objectives are very specific and therefore only relate to certain IA Objectives, as such these are likely to have a neutral effect on other IA Objectives. Given the complex inter-relationships between objectives, some uncertainties were found; for example, the delivery of new housing and employment land has the potential to affect water resources and quality, flood risk, townscape, biodiversity and historic heritage settings. Positive effects and compatibility would be dependent on further objectives that seek to minimise potential negative effects, for example, objectives that seek to reduce demand for water resources, or objectives that seek high quality design. To reduce these uncertainties, two recommendations were made as follows:
- Theme A Objective B could be expanded to include wording that seeks to minimise effects on the natural environment whilst meeting housing needs. For example, 'Ensure provision of sufficient housing land and other opportunities for residential development that meets the needs of the current and future population of the Borough, *whilst minimising the impacts of development on the natural environment*'.
 - Theme B Objective A could be expanded to include wording that seeks to minimise effects on the natural environment whilst

delivering new employment land. For example, ensure provision of sufficient employment land and other opportunities for economic development to attract new businesses and to enable existing businesses to grow and develop within Cheltenham, *whilst minimising the impacts of development on the natural environment*¹.

Potential Site Allocations

- 5.4 The Gloucester, Cheltenham & Tewkesbury Joint Core Strategy (JCS) sets out the overarching strategy for development growth up until 2031. It has identified the objectively assessed need for the Cheltenham Borough area and the spatial strategy to accommodate this level of development. The JCS identifies a settlement hierarchy as the basis for delivering growth targets and Cheltenham Borough is identified within this as a Key Urban Area.
- 5.5 The Cheltenham Local Plan sets out in Policy PR1 housing site allocations and in Policy PR2 mixed-use development site allocations where new development will be provided to deliver the scale and distribution proposed in Policies SP1 and SP2 of the GCT Joint Core Strategy insofar as they relate to the need for development in Cheltenham Borough outside the strategic allocations proposed in the JCS. Policy SP2 of the JCS requires the Cheltenham Key Urban Area and its urban extensions to accommodate 10,917 new homes to 2031. Some of this development has already been completed and/or committed.
- 5.6 During preparation of the Cheltenham Local Plan, a number of site options were considered and appraised. Options were identified through the Strategic Housing Land Availability Assessment (SHLAA) and subject to Integrated Appraisal – the detailed findings of the IA are provided in this IA Report in Appendix VII.
- 5.7 Certain site options were progressed into the Cheltenham Borough Local Plan and others were not taken forward at this stage. The findings of the IA informed this selection but is not the sole source of information to inform decision-making as part of the plan preparation.

Table 5.1: Reasons for Selection or Non-Progression of Options for Site Allocations

Preferred Housing site or mixed use allocation	Site Ref	CP I&O Ref (IA Ref)	Site Name	Reason for exclusion from Preferred Options
No	S002	CP001	Land at Hyde Lane, Hyde Lane	SALA found site to not be deliverable or developable
No	S003	CP002	Land at Hyde Farm (west section)	SALA found site to not be deliverable or developable
No	S003 a	CP003	Land off Brockhampton Lane	The site is too small to allocate
No	S004	CP004	Land at Hunting Butts (west)	SALA found site to not be deliverable or developable
No	S005	CP005	Land at Hunting Butts (south), Swindon Lane	SALA found site to not be deliverable or developable

Preferred Housing site or mixed use allocation	Site Ref	CP I&O Ref (IA Ref)	Site Name	Reason for exclusion from Preferred Options
No	S006	CP006	Land at Hunting Butts (central) west of railway cutting	SALA found site to not be deliverable or developable
No	S007	CP007	Land at Hyde Farm (east section)	SALA found site to not be deliverable or developable
No	S008	CP008	Blooms Garden Centre, Evesham Road	SALA found site to not be deliverable or developable
No	S009	CP009	Hunting Butts Farm, east of railway cutting	SALA found site to not be deliverable or developable
No	S010	CP010	Land south of Hunting Butts Farm, Swindon Lane	SALA found site to not be deliverable or developable
No	S011	CP011	The Paddocks, Swindon Lane	SALA found site to not be deliverable or developable
No	S012	CP012	Land at Hunting Butts (east), Evesham Road	SALA found site to not be deliverable or developable
No	S013	CP013	Cheltenham Racecourse (north)	SALA found site to not be deliverable or developable
No	S014	CP014	Cheltenham Racecourse (south)	SALA found site to not be deliverable or developable
No	S015	CP015	Land off New Barn Lane 1 (south of Racecourse)	SALA found site to not be deliverable or developable
No	S016	CP016	Land off New Barn Lane 2 (south of Racecourse)	SALA found site to not be deliverable or developable
No	S017	CP017	Land off New Barn Lane 3 (south of Racecourse)	SALA found site to not be deliverable or developable
No	S018	CP018	Land east of Cheltenham Racecourse 1, Lake Street	SALA found site to not be deliverable or developable
No	S019	CP019	Land east of Cheltenham Racecourse 2, Park Lane	SALA found site to not be deliverable or developable
No	S020	CP020	Land north of Cheltenham Racecourse	SALA found site to not be deliverable or developable
No	S021	CP021	Land between Cheltenham Racecourse and B4632	SALA found site to not be deliverable or developable
No	S022	CP022	Land at Prestbury	SALA found site to not be deliverable or developable
Mixed use	S023	CP023	Priors Farm Fields (Land at Oakley)	Significant sustainability issues (landscape)
No	S024	CP024	Castle Dream Stud, Mill Lane	SALA found site to not be deliverable or developable
No	S025	CP025	Land at Mill Lane	SALA found site to not be deliverable or developable
No	S026	CP026	Land north of Greenway Lane	SALA found site to not be deliverable or developable
No	S027	CP027	Land south of Greenway Lane	SALA found site to not be deliverable or developable
No	S028	CP028	Land adjacent to Orchard Cottages	SALA found site to not be deliverable or developable
No	S029	CP029	Land south of Glenfall Way	SALA found site to not be deliverable or developable
No	S030	CP030	Land off Timbercombe Lane	SALA found site to not be deliverable or developable
No	S031	CP031	Land off Leckhampton Road	Site has planning permission: 15/00681/FUL

Preferred Housing site or mixed use allocation	Site Ref	CP I&O Ref (IA Ref)	Site Name	Reason for exclusion from Preferred Options
No		CP032	Land at Sunnyfield Lane (south), Up Hatherley Way	SALA found site to not be deliverable or developable
No	S040	CP033	Land at Sunnyfield Lane (north), Up Hatherley Way	SALA found site to not be deliverable or developable
No	S041	CP034	Arle Nursery and allotments, Old Gloucester Road	SALA found site to not be deliverable or developable
No	S042	CP035	Land at Old Gloucester Road	SALA found site to not be deliverable or developable
No	S043	CP036	Land at Fiddler's Green, Fiddler's Green Lane	SALA found site to not be deliverable or developable
No	S044	CP037	Land at Fiddler's Green, adjacent to Hayden	SALA found site to not be deliverable or developable
No	S045	CP038	Land at Golden Valley, Pheasant Lane	SALA found site to not be deliverable or developable
No	S046	CP039	Land north of Bamfurlong Lane	SALA found site to not be deliverable or developable
No	S047	CP040	Briarfields Motel and Touring Park, Bamfurlong Lane	SALA found site to not be deliverable or developable
No	S048	CP041	Land between A40 and Bamfurlong Lane (east)	SALA found site to not be deliverable or developable
No	S049	CP042	Land between A40 and Bamfurlong Lane (west)	SALA found site to not be deliverable or developable
No	S050	CP043	Land at The Reddings, north of Branch Road	SALA found site to not be deliverable or developable
No	S051	CP044	Land at The Reddings, south of Branch Road	SALA found site to not be deliverable or developable
No	S052	CP045	Land at the Hayloft (west), The Reddings / Badgeworth Road	SALA found site to not be deliverable or developable
No	S053	CP046	Land at the Hayloft (east), south of The Reddings	SALA found site to not be deliverable or developable
No	S054	CP047	Flowerdale Farm, The Reddings	SALA found site to not be deliverable or developable
No	S055	CP048	Land at Stansby Mobile Home and Touring Caravan Park, The Reddings	SALA found site to not be deliverable or developable
No	S056	CP049	Land west of Grovesfield Way, The Reddings	SALA found site to not be deliverable or developable
No	S057	CP050	Land off Grovesfield Way, The Reddings	SALA found site to not be deliverable or developable
No	S058	CP051	Land r/o Shakespeare Cottages, The Reddings	SALA found site to not be deliverable or developable
Housing	S059	CP052	Springbank Shopping Centre	Promotes plan objectives and aligns with strategy
No	S060	CP053	Land adjacent to former Goat and Bicycle Public House	SALA found site to not be deliverable or developable
Mixed use	S061	CP054	Land and buildings at Coronation Square	Site has mixed ownership but could come forward as a mixed regeneration scheme
No	S062	CP055	Community Centre & Scout Hut, Brooklyn Road	SALA found site to not be deliverable or developable

Preferred Housing site or mixed use allocation	Site Ref	CP I&O Ref (IA Ref)	Site Name	Reason for exclusion from Preferred Options
No	S063	CP056	Rowanfield Exchange, Devon Avenue	No net gain expected. Site is unlikely to come forward within the plan period.
Housing	S064	CP057	Christ College Site B	Promotes plan objectives and aligns with strategy
No	S065	CP058	Outer West, Land at Tewkesbury Road	SALA found site to not be deliverable or developable
No	S066	CP059	The Folley, Gardner's Lane	SALA found site to not be deliverable or developable
No	S067	CP060	Cheltenham Spa Railway Station	SALA found site to not be deliverable or developable
Housing	S068	CP061	Land at Lansdown Road (Gloucestershire Constabulary Headquarters)	Promotes plan objectives and aligns with strategy
No	S069	CP062	Commercial Street Car Park	SALA found site to not be deliverable or developable
No	S070	CP063	Reeves Field, Old Bath Road	Lack of evidence that playing fields loss, and landscape and conservation area impact can be satisfactorily mitigated
No	S071	CP064	King Alfred Way 1 & 2	SALA found site to not be deliverable or developable
No	S072	CP065	St Edwards Car Park, London Road	SALA found site to not be deliverable or developable
No	S073	CP066	Ellerslie Care Home, Albert Road	Site has planning permission: 13/01861/FUL
Mixed use	S074	CP067	Prestbury Road / Windsor Street 1	Part of larger mixed use site with S123
No	S075	CP068	Prestbury Road / Windsor Street 2	SALA found site to not be deliverable or developable
No	S076	CP069	Cakebridge Place	SALA found site to not be deliverable or developable
No	S077	CP070	Land at Prestbury Road	SALA found site to not be deliverable or developable
No	S078	CP071	Bences Timber Yard, St Johns Avenue	SALA found site to not be deliverable or developable
No	S079	CP072	Sherborne Place Car Park	SALA found site to not be deliverable or developable
No	S080	CP073	Axiom, 57 Winchcombe Street	Site has planning permission: 15/02268/FUL
No	S081	CP074	Rodney Road Car Park, Rodney Road	SALA found site to not be deliverable or developable
Mixed use	S082	CP075	Royal Well & Municipal Offices	Promotes plan objectives and aligns with strategy
No	S083	CP076	St Georges House, Bayshill Road	Site has planning permission: 15/00786/FUL
No	S084	CP077	Land at St Georges Place / St James Square	SALA found site to not be deliverable or developable
Housing	S085	CP078	Rivershill House, St Georges Road	Employment but planning permission for housing has been granted but it is pending a legal agreement
No	S086	CP079	Elim Pentecostal Church, St Georges Road	SALA found site to not be deliverable or developable

Preferred Housing site or mixed use allocation	Site Ref	CP I&O Ref (IA Ref)	Site Name	Reason for exclusion from Preferred Options
No	S087	CP080	Land adjoining Great Western Road	SALA found site to not be deliverable or developable
No	S088	CP081	Land at Chester Walk Car Park	Site is too small to allocate
No	S089	CP082	Rear of High Street Car Park	SALA found site to not be deliverable or developable
No	S090	CP083	Henrietta Street Car Park, St Margarets Road	SALA found site to not be deliverable or developable
No	S091	CP084	47 - 51 Swindon Road	Site has planning permission: 15/00354/FUL
No	S092	CP085	Land adjoining Kynance, Church Road	Site capacity is below 10 units
Housing	S093	CP086	Former Monkscroft Primary School	Promotes plan objectives and aligns with strategy
No	S094	CP087	Land at Stone Crescent	Site has planning permission: 14/01276/OUT but no S106. Site is too small to allocate
No	S095	CP088	Pittville School, New Barn Lane	Site has planning permission: 15/01163/OUT
No	S096	CP089	Pittville Campus	Site has planning permission: 14/01928/FUL
No	S098	CP090	Land adjacent to Ellerslie, Albert Road	The site functions as an important space between existing buildings. There are strong concerns over the impact of any development of the site in terms of built form, impact on heritage assets and amenity.
No	S099	CP091	Hardwick Site, St. Pauls Road	SALA found site to not be deliverable or developable
No	S100	CP092	Park Campus	SALA found site to not be deliverable or developable
No	S101	CP093	Depot	SALA found site to not be deliverable or developable
No	S102	CP094	Sandford Lido Car Park	SALA found site to not be deliverable or developable
No	S103	CP095	St James's Street Car Park	SALA found site to not be deliverable or developable
No	S104	N/A	Bath Road Car Park	SALA found site to not be deliverable or developable
No	S105	CP096	St. George's Road Car Park	SALA found site to not be deliverable or developable
No	S106	CP097	Bath Terrace Car Park	SALA found site to not be deliverable or developable
No	S107	CP098	Land south of Collum End Rise	SALA found site to not be deliverable or developable
No	S108	CP099	Land at Swindon Lane (Adj to dismantled line)	SALA found site to not be deliverable or developable
No	S109	CP100	Battledown	SALA found site to not be deliverable or developable
Mixed use	S110	CP101	North Place and Portland Street	Mixed use allocation in previous Local Plan
No	S111	CP102	Spirax Sarco HQ, Charlton House	SALA found site to not be deliverable or developable

Preferred Housing site or mixed use allocation	Site Ref	CP I&O Ref (IA Ref)	Site Name	Reason for exclusion from Preferred Options
No	S112	CP105	Land at Whaddon Road	Site capacity is below 10 units
Housing	S113	N/A	Premiere Products, Bouncers Lane	Promotes plan objectives and aligns with strategy
No	S114	N/A	Land Adjacent to Timbercombe Farm, Little Herberts Road, Charlton Kings	SALA found site to not be deliverable or developable
No	S115	N/A	Land to rear of 291-297 Cirencester Road, Charlton Kings	SALA found site to not be deliverable or developable
No	S116	N/A	The East Gloucestershire Club, Old Bath Road;	Site capacity is below 10 units
No	S117	N/A	Land adjacent to Longfield, Charlton Kings	SALA found site to not be deliverable or developable
No	S118	N/A	John Dower House, 24 Crescent Place, Cheltenham, Gloucestershire, GL50 3RA and South Court	SALA found site to not be deliverable or developable
No	S119	N/A	Karenza, Naunton Parade (HLA ref: COL1052)	Site is too small to allocate
No	S121	N/A	The Bredons, Harp Hill	SALA found site to not be deliverable or developable
No	S122	N/A	Land rear of Nuffield Hospital, Hatherley Lane	Safeguarded employment site
Mixed use	S123	N/A	100 – 102 Prestbury Road, Cheltenham	Part of larger mixed use site with S074
No	S124	N/A	Park Corner and land to the west of Park Corner, Bowbridge Lane, Prestbury	SALA found site to not be deliverable or developable
No	S125	N/A	Land north west of Racecourse	SALA found site to not be deliverable or developable
No	S126	N/A	Land south west of Racecourse	SALA found site to not be deliverable or developable
No	S127	N/A	Land south east of Ham Road	Site is within the AONB

- 5.9 The Integrated Appraisal considered cumulative effects and the inter-relationships between sustainability topics for each site option where possible; uncertainty and any gaps in information were recorded also.

IA of Policies: Social, Economic, Environmental

Introduction

- 5.10 This Section sets out the findings of the IA of the Cheltenham Borough Local Plan Part 1 Preferred Options. It is structured according to three key topics which cover the development of the Local Plan to date and which have been linked to relevant SA Objectives as well as SEA Directive topics. The appraisal of these topics have been divided into a number of sub-headings to ensure that each aspect of the emerging Local Plan is considered,

including policies and site allocations, as well as the interrelationships between topics and cumulative effects of the Plan as a whole.

- 5.11 Further topics covering in particular the natural environment, design and the Historic Environment are not assessed in detail in this appraisal, given that the more detailed development management policies will arise in later development of the Cheltenham Local Plan Part 2. The Cheltenham Local Plan Part 2 will be subject to SA which will identify the potential effects of the implementation of the Plan Part 2 and the Cheltenham Borough Local Plan as a whole. In the absence of detailed development management policies at this stage of Plan production, the Council has decided to retain the saved policies from the 2006 review of the previous Cheltenham Borough Local Plan. The saved policies include core principle policies (e.g. sustainable development and design), built environment policies (e.g. historic environment protection policies), natural environment policies (including urban green environment policies), landscape policies, retailing policies, cultural and recreational policies, transport policies, and utilities infrastructure policies. These retained policies will provide protection and mitigation for potential negative effects arising as a result of new development.
- 5.12 These policies are further supported by the policy framework contained within the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (GCT JCS) and national planning policies. The GCT JCS was subject to SA which concluded that given the mitigation provided through the plan and recommendation of the SA, the level and distribution of development is unlikely to lead to any significant negative effects.
- 5.13 In accordance with the SEA Directive and Regulations any likely significant effects are identified along with any mitigation measures necessary to address them.

Housing

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

- SA Objective 1: To ensure everyone has access to a high-quality home that they can afford and meets their needs

Appraisal of Cheltenham Borough Local Plan Policies

- 5.14 The overall level of housing growth is strategically set by the GCT JCS which seeks to deliver 35,175 new homes during the plan period. Policy SP1 in the Submission JCS (November 2014) sets a housing requirement of 10,917 new homes to be delivered in Cheltenham Borough between 2011 and 2031, with the distribution of development between the three authorities defined further in GCT JCS Policy SP2. Cheltenham Borough is unable to meet its full objectively assessed housing needs within the Borough boundary, and as such the JCS has determined strategic urban extensions on adjacent land which will support the future growth of Cheltenham. The urban extensions are identified as North West Cheltenham and West Cheltenham, which together

will deliver 5,385 new homes. The residual need of 5,532 dwellings will be met within the existing city boundary and is distributed across 9 allocations identified in Proposed Policy PR1 and 5 allocations for mixed-use development proposed in Policy PR2. This includes the Leckhampton site that has been subject to SA through the GCT JCS, and given significant reductions in numbers at this site, is now considered through the Local Plan.

- 5.15 Policies and allocations which deliver new housing have the potential for major long term positive effects on housing. Whilst the overall level of growth is determined by the GCT JCS, the Cheltenham LP seeks to deliver growth in areas with the least constraint (e.g. away from the Green Belt and AONB), to minimise potential negative effects arising.
- 5.16 It is considered that development in the Borough could be enhanced by further housing policies which seek to deliver an appropriate mix of types and tenures to meet the needs of the population in these local areas in line with the Plan and SA Objectives. Though it is recognised that this may emerge in later in the Cheltenham Borough Local Plan Part 2 as part of the more detailed development management policies, and is supported through Policy SD12 of the GCT JCS.
- 5.17 Gypsy and Traveller needs were assessed in the GCT JCS which has identified no need to deliver any new pitches within the Borough boundary. Affordable housing delivery targets are set in the GCT JCS, and the Cheltenham LP does not include any further policies relating to affordable housing.

Appraisal of Site Allocations

- 5.18 All of the proposed site allocations have the potential for long term positive effects on housing through the provision of residential development. Housing site allocations a) to g) are considered to have the potential for positive effects of greater significance given that these sites can be developed within the early stages of the plan period to address the existing housing backlog. The mixed-use site allocations are also considered to have positive effects of greater significance by delivering housing that is well connected to employment and infrastructure development. Housing Site Allocation i) is a combination of the previously assessed CP034 and CP035. Housing Site Allocation g) has a slightly amended boundary to that assessed as CP061, however this is not considered to significantly affect the findings of the assessment of site option CP061.

Synergistic and Cumulative Effects

- 5.19 Overall, the Cheltenham LP will have short to long term positive cumulative effects on housing through the provision of new homes to help meet the objectively assessed need of the Plan area as determined within the GCT JCS. The Cheltenham LP seeks to designate existing green spaces (Proposed Policy GE8) which will support housing and mixed-use development with the potential for major long term positive synergistic effects, through connected spaces, new green infrastructure network connections, and an attractive public realm which can attract continued investment and renewal.

Interrelationships with other Topics

- 5.20 The provision of housing and associated delivery of services and facilities also has the potential for indirect positive effects on a number of other topics, which include economy and employment, health and equalities, and transport and accessibility. Conversely, the delivery of housing also has the potential for negative effects on a number of topics, which include health and equalities, transport and accessibility, air quality, climate change, water resources, water quality, flooding, the natural environment, cultural heritage and waste and recycling. The potential indirect effects are mitigated by other saved policies from the 2006 review of the Cheltenham Local Plan, and through higher level policies provided through the GCT JCS and NPPF.

Economy and Employment

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

- SA Objective 2: Ensure the availability of employment land and premises to encourage inward investment, support the growth of existing businesses and the vitality of the town and its suburbs

Appraisal of Cheltenham Local Plan Policies

- 5.21 Policy SP1 in the GCT JCS plans for the delivery of new employment land to support around 39,500 new jobs. Policy SD2 supports economic development within the identified strategic allocations in the GCT JCS, as well as within Gloucester, Cheltenham and Tewkesbury town. GCT JCS Policy SD3 identifies that new retail development will be encouraged in accordance with the saved policies of the existing Cheltenham Local Plan (saved from the 2006 review).
- 5.22 The delivery of new employment land outlined in Policy EM3 has the potential for major long term positive effects on the economy by helping to meet the employment needs of the Plan area. The Cheltenham LP further seeks to support economic development through the safeguarding of existing key employment sites, including non-designated employment sites which is likely to lead to major long term positive effects by retaining and supporting existing businesses to thrive and grow.
- 5.23 Policy PR2 further seeks to deliver mixed-use development, which can indirectly lead to long-term major positive effects on the economy by increasing accessibility and supporting comprehensive development to meet local needs. This is supported by Policy EM5 which seeks to safeguard the former Honeybourne rail line, recognising its value as a future sustainable transport corridor linked to economic areas.
- 5.24 Policy EM4 seeks to promote the economic strengths of Cheltenham (the cyber-security sector) which is likely to lead to long term major positive effects

by increasing the opportunity to economies distinct to Cheltenham and of high value.

- 5.25 It is considered that the economic policies could be enhanced by recognition of the tourism values within Cheltenham, particularly Cheltenham Racecourse, which supports local economies and local economic distinctiveness. However it is recognised that retail and tourism is likely to be considered in Part 2 of the Cheltenham Local Plan.

Appraisal of Site Allocations

- 5.26 The employment site allocations have the potential for long term positive effects on the economy through the provision of new employment land. Allocation E3 is considered to have positive effects of greater significance given the larger scale of development at this site. Allocation E1 is located centrally and as such is well connected to the central area infrastructure, services and facilities and easily accessible by existing public transport routes, which will support access to employment opportunities for local residents.

Synergistic and Cumulative Effects

- 5.27 Overall the policies contained within the Cheltenham LP seek to deliver the identified employment growth needs, protect and enhance existing employment areas, and restrict the loss of existing employment areas with the potential for minor to major long term positive cumulative effects.

Interrelationships with other Topics

- 5.28 The provision of new employment land has the potential for indirect positive effects on health and equalities, and transport and accessibility. However, there is also the potential for negative effects on a number of topics, which include health and equalities, transport and accessibility, air quality, climate change and flooding, water resources, water quality, flooding, natural environment, cultural heritage and waste and recycling. The potential indirect effects are mitigated by other saved policies from the 2006 review of the Cheltenham Local Plan, and through higher level policies provided through the GCT JCS and NPPF.

Equality Impact Assessment (EqIA)

- 5.29 Under the Equality Act 2010, public authorities such as Cheltenham Borough Council must, in the exercise of their functions, have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by or under the Act.
 - Advance equality of opportunity between people who share a characteristic and those who do not share a characteristic.
 - Foster good relations between people who share a characteristic and those who do not share a characteristic.

- 5.30 An EqlA is a tool which seeks to improve the work of the Council and ensure that they meet the requirement of the Equality Act 2010. This Act applies to the provision of services and public functions and includes the development of Council policies and plans. The Act prevents discrimination on the basis of nine protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
- 5.31 Inequality can exist in a number of forms and where land use planning is concerned, this can include inadequate provision of and access to services (health, food stores, education facilities), good quality homes, employment opportunities, a healthy living environment and transport infrastructure (roads, pavements, public transport) for all members of society.
- 5.32 It is important to note that assessment of equality, diversity, and health/well-being (which is an important aspect of equality) has been detailed through the Integrated Appraisal (IA) process. All aspects of the developing Cheltenham Local Plan have been appraised against a IA framework including several IA objectives that directly and indirectly address equality, health and diversity and these include: No.1 – Housing; No.2 Economy & Employment; No. 3 Healthy Communities; No. 4 Accessibility to Services (including health & education); No. 5 Accessibility to Public Transport; No. 7 Air Quality; No. 11 Landscape; No.12 Historic Environment and No. 13 Cultural Heritage. The findings of this EqlA have been integrated into the IA of the Cheltenham Local Plan and are provided separately as Appendix VIII to the Draft IA Report.
- 5.33 The screening assessment has found that the Cheltenham Local Plan is unlikely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and as a result a full EqlA will not be required.

Habitats Regulations Assessment (HRA)

- 5.34 The Conservation of Habitats and Species Regulations 2010 (as amended) [the Habitats Regulations] require that Habitats Regulations Assessment (HRA) is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of European sites⁴⁶.
- 5.35 The HRA process for the Cheltenham Local Plan will be informed by the findings and conclusions of the HRA process for the JCS. The Pre-Submission Draft JCS HRA Report⁴⁷ (May 2014) concluded that the mitigation provided through JCS policies and available at the project level is sufficient to ensure that there will be no adverse effects on any European sites as a result of proposed development either alone or in combination.
- 5.36 An initial screening assessment of the Cheltenham Local Plan was carried out to determine if the emerging policies and potential sites have the potential

⁴⁶ These include Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites.

⁴⁷ <http://www.gct-jcs.org/PublicConsultation/SAPR-Sustainability-Appraisal-Pre-Submission.aspx>

for likely significant effects on any European sites. The screening found that the development proposed in the Cheltenham Local Plan is considered unlikely to have significant effects on any European sites alone or in combination with other plans and projects.

6.0 INTEGRATED APPRAISAL OF THE PRE-SUBMISSION CHELTENHAM PLAN (REGULATION 19) (November 2017)

Context

- 6.1 **Joint Core Strategy:** As a result of issues raised and discussions held at the independent examination of the Gloucester, Cheltenham & Tewkesbury (GCT) Joint Core Strategy (JCS), proposed main modifications were published for consultation between 27 February and 10 April 2017. These were further considered at the resumed examination in July 2017. The Inspector's final report⁴⁸ (October 2017) confirmed the uplift in housing numbers, including a minimum requirement of 10,917 dwellings for Cheltenham (para 55). The strategic allocation at Leckhampton (A6) was confirmed to be unsound; however, a reduced allocation is considered to be appropriate for the Cheltenham Plan.
- 6.2 The cross-boundary strategic urban extensions at North West Cheltenham and West Cheltenham (subject to SA through the JCS) were confirmed (para 104) – both are partly within Tewkesbury Borough. As these strategic sites will take time to deliver, the Inspector recommended that a stepped approach is justified for Cheltenham – 450 dwellings per annum from 2011-22 and a stepped increase to 663 dwellings per annum from 2022-31. The NW Cheltenham land is safeguarded (4,285 dwellings) at present for reasons of deliverability due to traffic issues, but has potential for future development; a green buffer must be retained around Swindon village. The W Cheltenham land is safeguarded (1,100 dwellings) and cannot be allocated currently due to odour emission issues from the Hayden Sewage Treatment Works. Odour modelling will identify where development can occur and potential areas for future development.
- 6.3 **The Cheltenham Plan:** The Part One Preferred Options draft plan was subject to consultation for six weeks from 6 February to 20 March 2017, and focused on three policy areas:
- Economic strategy
 - Potential local green space designations
 - Potential development site allocations

All responses are available to view online⁴⁹ and a consultation statement is available.

- 6.4 The Council considered the representations received and any updated evidence, including a further call for sites⁵⁰ that may be suitable for future development, in order to prepare the next draft of the Plan – Pre-Submission

⁴⁸ <https://jointcorestrategy.org/examination>

⁴⁹ <http://consult.cheltenham.gov.uk/consult/ti/cododdo/consultationHome>

⁵⁰ https://www.cheltenham.gov.uk/info/46/planning_policy/1034/the_cheltenham_plan/3

Regulation 19 consultation. The Council decided to bring forward its work to prepare the development management policies, rather than prepare a Part Two Plan. All components of the plan (Vision, Objectives, Policies & proposed Site Allocations) are integrated and presented in the Pre-Submission Cheltenham Plan.

- 6.5 **Integrated Appraisal (IA):** The IA Report (incorporating SA/SEA, HRA and EqIA) (October 2016) accompanied the Preferred Options Plan on consultation. The details of comments received are presented in Appendix V of this IA Report (November 2017). The Environment Agency had no specific comments on the SA and HRA but raised issues for site option selection and plan-making associated with requirements for Strategic Flood Risk Assessment (SFRA) Level 2 and as foul drainage infrastructure assessment (as part of the Infrastructure Delivery Plan).
- 6.6 Natural England (NE) did not agree with the conclusion of the HRA Screening (October 2016) of no likely significant effects with regard to the Cotswold Beechwoods Special Area of Conservation (SAC). They assert that the Cheltenham Plan area is approximately 5km from the Cotswold Beechwoods SAC. Whilst most of the site allocations are over 10km from the Cotswold Beechwoods SAC, as yet there is no strategic understanding of where visitors come from and how they use the SAC, no established zone of influence for recreational pressure and no mitigation plan. In combination impacts must also be considered. Without this information NE advised that it is not possible to reach a conclusion of no likely significant effects from the Cheltenham Plan based on distance alone. It may be noted that at this time, discussions were ongoing between the JCS authorities and NE in respect of the Cotswold Beechwoods SAC and the emerging final JCS.
- 6.7 Historic England had no comments on the SA or HRA but recommended a specific heritage policy in the Plan. Highways England did not have any comments on the SA or HRA but noted that they could not support an all-movement M5 J10 at this time, and that further modelling/evidence is required.
- 6.8 One respondent asserted that the SA Report (October 2016) did not include a comparative assessment of potential sites and is not transparent. The SA is only required to carry out a comparative assessment using the SA objectives/criteria of those options that are considered to be reasonable. Table 5.1 sets out the reasons for selection or rejection of site options. Comparative assessment was undertaken and reported in detail in Appendix VI; however, summary table now included here in this Section 6 of the SA Report to present explicitly the comparative analysis.
- 6.9 Another respondent was concerned that there should a full Health Impact Assessment to address well recorded concerns are in respect of unacceptable levels of air or soil pollution, odours both alone or cumulatively. The SA response explained that there was no requirement for a full HIA of the plan but that the SA Framework of Objectives includes consideration of Health/Well-being (No 3), Transport & Traffic (Nos 5&6), Air Quality (No 7),

Water (No 8) and Soils (No 14); and that the SA considers the cumulative effects of the emerging elements of the draft Plan.

- 6.10 A final respondent was concerned about when and how air pollution is to be recognised and tackled in the Local Plan. This is a matter for plan-making but the SA response explained that the SA Framework includes consideration of Health/Well-being (No 3), Transport & Traffic (Nos 5&6), and Air Quality (No 7).

The Pre-Submission Regulation 19 Cheltenham Plan

- 6.11 The Cheltenham Plan comprises the same as the Preferred Options for the three themed Vision and Objectives – with only minor amendments made as a result of consultation. The Objectively Assessed Need (OAN) for Cheltenham has been assessed as part of the JCS process; the overall housing requirement for the whole of the JCS area between 2011 and 2031 is 35,175 dwellings with the Cheltenham-specific figure being 10,917 units– and as set out the JCS Policy SP1. The Strategic Allocations have been confirmed at 5,385 dwellings through the safeguarded sites at North West Cheltenham (4,285 dwellings) and West Cheltenham (1,100 dwellings) and to be delivered later in the plan period. Land allocated for housing and mixed-use development is set out in two new policies H1 and H2 respectively (previously RD1-2).
- 6.12 The Plan includes further locally specific development management Policies to guide development (and building upon the strategic policies in the JCS) in chapters as follows:
- Employment (EM1-6)
 - Design Requirements (D1-3)
 - Green Belt (GB1-2)
 - Historic Environment (HE1-5)
 - Residential Development (H 1-2)
 - Housing Mix & Standards (HM1-5)
 - Gypsy, Travellers, & Travelling Showpeople Sites (GT1)
 - Health & Environmental Quality (SL1)
 - Access to the Transport Network (TN1-2)
 - Green Infrastructure (GI1-3)
 - Social & Community Infrastructure (CI1-4)

Integrated Appraisal (IA) Findings

- 6.13 **Vision & Objectives:** Minor amendments were made to the Vision & Objectives. Theme A (g) was amended for clarification and a new criterion (j) added to “*improve health outcomes by promoting and prioritizing active health*”; this will confirm and enhance the previous positive compatibility for SA Objectives Health/Well-being (No 3), Transport & Traffic (Nos 5&6), and Air Quality (No 7). Clarification and stronger aims are carried into Themes B criterion (d) & C criterion (e) seeking to deliver a range of sustainable transport choices and recognising the multi-functionality of green spaces that

link pedestrian and cycle routes. Again, the clarifications to the criteria strengthen the positive compatibility effects found at the Preferred Options stage, which remain valid and relevant.

- 6.14 **Site Allocation Options:** All options for possible site allocation that were deemed to be reasonable (realistic and deliverable in the plan period) were subject to IA and the findings detailed in the IA Report accompanying the Preferred Options Plan (October 2016) and including here in this IA Report as Appendix VII. The IA findings were discussed and as presented in Section 5 previously in this IA Report, including the reasons for selection or rejection of options (Table 5.1). At the time of assessment in 2016, strong mitigation measures for potential negative effects were available through the strategic policies in the higher-level plan – the JCS – notably SD4 sustainable Design & Construction, SD8 Cotswold AONB, SD9 Historic Environment, SD10 Biodiversity & Geodiversity, SD13 Affordable Housing, INF3 Flood Risk Management, INF6 Renewable Energy/Low Carbon Development, INF7 Infrastructure Delivery, and INF8 Developer Contributions. This Pre-Submission Cheltenham Plan includes locally specific policies that provide further mitigation for negative effects and this has been taken into account when updating the SA of the site allocations.
- 6.15 **Development Management & Allocation Policies:** The Preferred Options Plan included draft policies EM1-3 & 5; minor wording change for clarification, otherwise policies remain the same in the Pre-Submission Plan. Policies RD1-2 allocating land for housing and mixed use are now renamed Policies H1-2 and include some changes to sites. Land off Oakhurst Rise is a new site added to Policy H1 for housing development; Leckhampton is a new site that had previously been considered as a strategic site for the JCS – now considered more suitable as a non-strategic site in the Cheltenham Local Plan. Lansdown Industrial Site is a new mixed-use site that is included in Policy H2 Mixed Use Development. The detailed SAs of these additional site options are presented in Appendix VII of this IA Report.
- 6.16 The Preferred Options Draft Plan also included Policy TN1 protecting the route of the former Honeybourne railway line, which remains the same but is now part of the transport section rather than the economy section. Policy GI1 remains the same but includes more sites for public open/green space rather than having another separate policy. Therefore, the IA of the previous Plan elements remains valid and relevant.
- 6.17 The Pre-Submission Plan now includes additional locally specific development management policies as listed above in paragraph 6.12 of this report. The locally specific requirements provide more detail and more certainty for implementation of potential mitigation measures for any local negative effects identified; also, implementation of any possibilities for enhancement and positive effects. This IA has sought to build upon the previous IA and consider the implementation of the draft Plan as a whole on sustainability themes as follows:

Housing

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

- No 1: To ensure everyone has access to a high-quality home that they can afford and meets their needs

6.17 Policy H1 Housing Development lists the sites allocated for housing development and includes two new sites – Land off Oakhurst Lane (80-100 dwellings) & Leckhampton (350 dwellings) – detailed SA findings in Appendix VII of this SA Report. The Policy continues to include sites b, d, h and l; sites c, e and g are not progressed at this stage as they already have planning permission now. Previous site f is now called Bouncers Lane and included as an allocation (part has planning permission). The Leckhampton site (previously site h) had been a strategic locational option (>500 dwellings) considered in the GCT JCS but was found through the examination to only be suitable for a local site allocation (350 dwellings) due to concerns about landscape and visual amenity impacts. The new allocations for land off Oakhurst Lane, Stone Crescent & Brockhampton Lane are now progressed to help meet the identified local need for housing. The Priors Farm site has been moved from mixed-use to housing policy. Site a is not progressed because of heritage and landscape concerns.

6.18 The allocations for local (non-strategic) development sites is shown in the table following:

Policy H1: Allocated Local Sites	Number of Dwellings
Christ College Site B	70
Land at Lansdown Road	45
Reeve's Field	80
100-102 Prestbury Road	40
Former Monkscroft Primary School	60
Bouncer's Lane	70
Land off Oakhurst Rise	80-100
Land at Stone Crescent	15-20
Brockhampton Lane	20-25
Prior's Farm Fields	90
Leckhampton	350
Old Gloucester Road	200

6.19 Certain major negative effects on air quality, transport, landscape and health had been identified in the October 2016 Initial SA Report (Appendix VII) for several of the potential site allocation options. This included five of the options that are now local allocation sites in the Regulation 19 Plan, as follows:

- Monkscroft primary school
- Brockhampton Lane

- Priors Farm fields
- Coronation Square
- Old Gloucester Road

- 6.20 Monkscroft primary school, Coronation Square and Old Gloucester Road all had potential major negative effects on transport and air quality, with some uncertainty. However, mitigation is available through the development management policies in both the GCT JCS and the Draft Cheltenham Local Plan. JCS policies INF1-4 and INF6 Renewable Energy/Low Carbon Energy Development and Cheltenham Plan Policies TN1-2 will favor public transport and therefore reduce emissions from private vehicles. Furthermore, the sites have good access to sustainable transport and services/facilities, such that an increase in private vehicle use is less likely. Therefore, taking into consideration the available Policy mitigation, it is considered major negative effects are reduced to a neutral effect.
- 6.21 Brockhampton Lane, Priors Farm fields and Old Gloucester Road were all considered to have major negative effects on landscape. However, the JCS contains mitigation through Policy SD7 Landscape and SD8 Cotswold AONB. These policies will protect the landscape in and around Cheltenham and the setting of the AONB from the effects of new development. Further mitigation is provided through Local Plan Policy L1 and Local Plan Policies D1-3. Therefore, with mitigation available it is considered that major negative effects are reduced to neutral.
- 6.22 Further major negative effects had been indicated for health at the Priors Farm Fields site due to the distance for access to the walking/cycle network for Coronation Square. However, mitigation is available for Priors Farm through Local Plan Policy CI2 which requires new development to contribute to meeting local open space and sports standards, reducing major negative effects to neutral. Coronation Square has good sustainable transport links via bus, and therefore is less likely to result in increased car use. Major negative effect reduced to minor negative.
- 6.23 Policy H2 Mixed Use Development retains Land at North Place/Portland Place (previously site e) and a new site at Lansdown Industrial Estate includes housing provision of 143 plus 180 respectively. The new allocation for land at the Lansdown Industrial Estate is included to help meet the identified local need for housing whilst retaining important employment land. Policy H2 also now progresses Land at Coronation Square and at Royal Well/Municipal Offices. Policy GT1 Gypsy, Traveller & Travelling Showpeople Sites is a new policy setting out a location for 3 pitches at Mill Lane. Policies HM1-5 set out guidance for specific types of housing – student; elderly; loss of residential accommodation; agriculture & forestry dwellings; and houses in multiple occupation. Policies GB1-2 carry forward the approach to building in the Green Belt providing mitigation measures to safeguard the principles & aims of the Green Belt designation.

- 6.24 The reasons for selecting or rejecting reasonable alternative site options for allocation remain valid and as reported in the SA Report (2016) and as set out here in this report in Table 5.1. Allocations proposed at the Regulation 18 consultation (February-March 2017) have been updated to take account of some sites gaining planning permission and other suitable sites coming forward. New site options have been subject to SA and reported here within the updated Appendix VII. Overall, the land allocated for housing in H1-2 & GT1 will have major positive effects on SA objective for housing with cumulative effects in the longer term. Policies GT1 and HM1-5 further support the positive effects and help ensure that the needs of all are met.
- 6.25 At a late stage of plan-making and assessment, Gloucester County Council advised the need for a secondary school and that the Leckhampton site was preferred. This means that the proposed development changes from around 330 dwellings to around 200-250 dwellings plus the school. The implications for the overall findings of the SA are not significant: the quantum of housing remains sufficient that affordable units can be provided and maintains the major positive effects for SA objectives on housing for all; the provision of a new school will ensure that there is educational capacity for existing and new communities in the area into the longer term, thus confirming the likely positive effects for SA objectives on provision and access to services/facilities. The JCS and other Plan Policies will ensure that there are no significant negative effects arising from the change of proposed development.

Economy, Employment & Tourism

SEA Directive Topics: Population & Human Health

Relevant SA Objectives:

- No 2: Ensure the availability of employment land and premises to encourage inward investment, support the growth of existing businesses and the vitality of the town and its suburbs

- 6.26 Policies EM1-3 & EM5 were EM1-4 in the Preferred Options and there have been no significant changes such that the major positive effects for economy and employment are confirmed. New Policy EM1 requires provision of an Employment Skills Plan for major employment development to identify opportunities for local people. This will have further positive effects for sustainable transport through helping to avoid the need for people to travel outside the area for work. New Policy EM6 carries forward the previous approach to conversion of rural buildings, safeguarding existing or planned uses for agriculture with positive effects for such viability and employment.

Healthy Communities

SEA Directive Topics: Population & Human Health, Material Assets

Relevant SA Objectives:

- No 3: Support communities with inclusive design, promote healthy lifestyles and reduce inequalities in wellbeing and opportunity.
- No 4: Improve provision and accessibility to services and facilities, including health and educational facilities.

- 6.27 Provision of land for housing and employment will contribute to SA objectives for communities/population and health. Policy D1 confirms the previous approach to design and sets out how the local approach will accord with the requirements in the JCS. Policy D2 sets out requirements for advertisements, signs & hoardings providing mitigation measures against potential negative effects on visual amenity. Policy D3 sets out the requirements with regard to private green space which is a particular issue for Cheltenham. The policy seeks to ensure that the value of such spaces is understood and maintained in order to contribute to a strategic approach for enhancing the townscape and environmental value of Cheltenham's green space – all with positive effects for human health.
- 6.28 New Policies CI1-4 provide guidance to ensure that adequate services and facilities are associated with new development, indicating positive effects for SA objectives. Policy CI1 will ensure that development is only permitted where adequate community infrastructure is available or can be provided. Policy CI2 ensures that new development will contribute to meeting local open space and sports standards – with positive effects also for health that will be cumulative in the longer term. Policy CI3 provides mitigation through compensation for any loss of allotment land – with neutral effects. Policy SL1 Safe & Sustainable Living requires development to address crime/fear of crime, security and amenity of adjacent land users – providing strong mitigation measure for potential negative effects. New Policy CI 4 requires new development to be served by high speed and reliable broadband with positive effects; also supporting other SA objectives such as reducing the need to travel as this might encourage home-working.

Sustainable Transport

SEA Directive Topics: Population & Human Health; Material Assets

Relevant SA Objectives:

- No 5: Maximise the use of sustainable modes of transport and reduce the need to travel by car
- No 6: To ensure safety and ease of access to the existing road network, and ensure that there is capacity to accommodate growth.

- 6.29 Policy TN1 is retained and now located in the Transport section of the Plan with positive effects for the longer term in protecting the route of the former Honeybourne rail line. New Policy TN2 seeks to encourage more sustainable transport by discouraging any new long-stay carparking in the Core Commercial Area – with positive effects.

Air Quality & Climate Change

SEA Directive Topics: Air; Climatic Factors

Relevant SA Objectives:

- No 7: To reduce the contribution to climate change and reduce the contribution to atmospheric pollution, including greenhouse gases

- 6.30 The adopted GCT JCS (2017) includes policies that guide new development with the aims of mitigating effects and adapting to climate change – JCS INF1-4 and INF6 Renewable Energy/Low Carbon Energy Development. These JCS Policies together with the Cheltenham Plan Policies TN1-2 will further support the SA objective. Air quality is closely associated with emissions from vehicles – JCS and Cheltenham Plan Policies that discourage the use of private vehicles and promote more sustainable transport are likely to have positive effects on air quality, particularly in the longer-term.

Flooding, Water Resources and Water Quality

SEA Directive Topics: Water; Material Assets

Relevant SA Objectives:

- No 8: To reduce the demand for water, and maintain and improve the quality of water
- No 9: To manage and reduce flood risk.

- 6.31 The adopted GCT JCS (2017) includes Policy INF3 Flood Risk Management that ensures new development conforms to national policy with at least neutral effects. As part of ongoing commitments to reducing flood risk in the county, the JCS authorities will, subject to meeting other national and local policy objectives, support any development that contributes to the delivery of any proposed flood alleviation plans that have wider benefit to communities at risk in the JCS area – with potential for positive synergistic effects.

Biodiversity & Geodiversity

SEA Directive Topics: Biodiversity, Flora & Fauna; Heath

Relevant SA Objectives:

- SA Objective No 10: To safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats.

- 6.32 The adopted GCT JCS (2017) includes Policy SD10 Biodiversity & Geodiversity that requires conservation and enhancement of biodiversity on international, national and locally designated sites and other assets of demonstrable value - ensuring that new development has no unacceptable adverse impacts; thus at least neutral effects and potential positive effects if enhancement included in proposals. Policy INF4 explains how the JCS authorities will work together with stakeholders such as Natural England & the Environment Agency to develop management and mitigation packages for important green and ecological networks and to discuss how future development can contribute to this.
- 6.33 Natural England had some concerns about the effects on the Cotswold Beechwoods SAC as a result of the Cheltenham Plan in response to the consultation on the Regulation 18 draft plan (February-March 2017) (please note Appendix V of this IA Report & separate HRA Report).
- 6.34 The Habitats Regulations Assessment (HRA) Screening Report (October 2014, updated May 2015 & October 2016) sets out how the GCT JCS will not have adverse effects, alone or in-combination, on the integrity of the identified European sites, and that there is no need to undertake further Appropriate Assessment. Mechanisms are in place to mitigate likely significant effects arising from increased traffic on the A46 (air quality) and increased recreational use (disturbance) in respect of Strategic Allocation A11 West Cheltenham that is some 2.3km from the Cotswold Beechwoods SAC – and as agreed through the Statement of Cooperation with Natural England. The HRA of the GCT JCS was found to be legally compliant through the examination process.
- 6.35 The JCS authorities are committed to working in partnership including with the environmental regulators for further discussions to identify and agree any necessary appropriate mitigation plan to ensure delivery of strategic green infrastructure. Cheltenham Borough Council will continue to consider the implications of the Local Sites in the Cheltenham Plan and the need for any visitor surveys to inform the development of any local green infrastructure plan- and in line with ongoing JCS discussions. Thus, the HRA screening continues to conclude that Cheltenham Plan will not have adverse effects, alone or in-combination, on the integrity of the identified European sites.
- 6.36 Local Plan Policy GI1 Local Green Space is progressed from the previous consultation draft and includes more sites, confirming positive effects that will be synergistic and cumulative for both biodiversity and human health. New Policy GI2 progresses the protection and replacement of trees and thus, contributes to these positive effects.

Landscape & Townscape

SEA Directive Topics: Landscape

Relevant SA Objectives:

- SA Objective No 11: Protect and improve the quality of the townscape and the broader landscape setting

- 6.37 The adopted GCT JCS (2017) includes Policy SD7 Landscape and SD8 Cotswold AONB – which protect the landscapes/townscapes and their settings from the effects of new development with at least likely neutral effects through mitigation measures such as screening and layout design. Local Plan Policy L1 complements the JCS policy and recognises the local distinctiveness and particular qualities that make Cheltenham special, thus confirming mitigation and ensuring no significant negative effects. Also, further supported by JCS Policy SD5 Design and Local Plan Policies D1-3.

Historic Environment

SEA Directive Topics: historic environment

Relevant SA Objectives:

- SA Objective No 5: To protect and enhance the area's distinctive historic environment, including known and potential archaeological sites, designated and non-designated heritage assets and their setting, in a manner appropriate to their significance.

- 6.38 The adopted GCT JCS (2017) includes Policy SD9 Historic Environment that requires new development to have regard to the JCS Historic Environment Assessment (HER) to demonstrate that potential impacts on heritage assets and appropriate mitigation measures have been addressed. Local Plan Policies HE1-3 & 5 set out requirements for locally specific issues in Conservation Areas, and HE4 covers national and local archaeological remains of importance. These policies ensure that any potential negative effects will be avoided or mitigated with residual neutral effects for SA objective on the historic environment.

Cultural Heritage

SEA Directive Topics: Cultural Heritage

Relevant SA Objectives:

- SA Objective No 13: To protect and enhance the area's distinctive qualities that form part of the attraction to and fondness for the area.

- 6.39 The JCS Policy SD8 Cotswold AONB includes specific reference to cultural heritage qualities with regard to the AONB. This is continued with the Local Plan that has not allocated any development sites in the AONB or the Green Belt. One site (Policy GT1) with 3 pitches is suggested at Castle Dream Stud,

Mill Lane for gypsies and travellers, a site that has been occupied since 2011 via a temporary permission, and the small scale of this indicates that there will be no significant negative effects on the special qualities of the AONB.

Land & Soils

SEA Directive Topics: Soil

Relevant SA Objectives:

- SA Objective No 14: Minimise the use of natural resources including soil and greenfield land, protect safeguarded mineral resources, and soil quality.

- 6.40 All development will take the soil resource with permanent negative effects. However, the Local Plan seeks to use previously developed land, wherever possible, and this contributes to mitigation. Policy CI3 seeks to protect allotment land with positive effects for natural resources and human health.

Equality Impact Assessment (EqIA)

- 6.41 Initial findings were subject to consultation from wider stakeholders during the Regulation 18 consultation February – March 2017 alongside the Draft Cheltenham Borough Local Plan (Part One Preferred Options, October 2016) Integrated (Sustainability) Appraisal Report. No comments were received on the EqIA.
- 6.42 The EqIA was updated to reflect the changes made to the plan since Regulation 18. Overall, the proposed policies in the Regulation 19 Cheltenham Plan help to confirm the compatibility with aims for equality by confirming the approach proposed in the Preferred Options Plan and confirming the likely positive effects. Policies on housing and employment land are confirmed; this includes Policy GT1 for gypsies and travellers with major positive effects for this distinct ethnic group. Policies HM1 & 2 recognise the particular needs for students and the elderly respectively – confirming positive effects.
- 6.43 The updated assessment has confirmed that the Cheltenham Plan is unlikely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and as a result a full EqIA will not be required.

Habitats Regulations Assessment (HRA)

- 6.44 The updated HRA Screening continues to conclude that the Cheltenham Plan will not have adverse effects, alone or in-combination, on the integrity of the identified European sites. Some concerns were raised by the environmental regulator Natural England (NE) regarding no strategic understanding of where visitors come from and how they use the Cotswold Beechwoods SAC.

- 6.45 Since these concerns were raised by NE, the modifications to the JCS have been agreed and the JCS has been found sound (November 2017). The adopted JCS confirms that the JCS authorities are committed to working in partnership, including NE, to identify and agree any necessary appropriate mitigation plan to ensure delivery of strategic green infrastructure. Cheltenham Borough Council will continue to consider the implications of the Local Sites in the Cheltenham Plan and the need for any visitor surveys to inform the development of any local green infrastructure plan- and in line with ongoing JCS discussions.

7.0 PROPOSED MONITORING

Proposed Monitoring

- 7.1 The SEA Directive and Regulations require that the significant effects (positive and negative) of implementing the plan should be monitored in order to identify at an early stage any unforeseen effects and to be able to take appropriate remedial action. Government guidance⁵¹ on SA/SEA advises that existing monitoring arrangements should be used where possible in order to avoid duplication.
- 7.2 Government requires local planning authorities to produce Monitoring Reports (MRs), and the Cheltenham Borough Monitoring Report⁵² (produced annually) alongside the monitoring framework provided in the GCT JCS⁵³ is considered sufficient to ensure appropriate monitoring takes place going forward.

⁵¹ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

⁵² https://www.cheltenham.gov.uk/info/46/planning_policy/378/local_development_framework_evidence_base/5

⁵³ <https://jointcorestrategy.org/home>

8.0 SUMMARY CONCLUSIONS, CONSULTATION AND NEXT STEPS

Summary Conclusions

- 8.1 The representations to the Regulation 18 consultation (February – March 2017) have been taken into consideration in both the SA & HRA, and to inform the development of the Regulation 19 draft Cheltenham Plan. The changes made to the draft plan have been considered with regard to the implications of the previous findings of the SA; any significant changes have been subject to SA and the implications for the implementation of the plan as a whole have been assessed.
- 8.2 Minor changes have been made to site allocations for updating where sites now have planning permission, and to include other sites to ensure that the identified need for housing and employment is met. The reasons for selecting and rejecting site options remains valid as previously reported and updated in this report. The Regulation 19 Cheltenham Plan now includes development management Policies that support the Policies in the GCT JCS and provide guidance for development that recognises the special qualities and characteristics of the Cheltenham area. These policies strengthen and confirm positive effects and mitigation measures to address potential negative effects.
- 8.3 Overall, the SA found that the Cheltenham Plan is likely to have positive effects for SA objectives for housing, employment/economy, and communities, that are cumulative in the longer-term. There is the potential for negative effects on the highway network, landscape/townscape and the historic environment, but mitigation is provided through policies and the location of local allocations to minimise effects. The JCS includes mitigation measures and specific requirements for strategic level development – A6 North West Cheltenham & A11 West Cheltenham. Positive effects are indicated through policy on green space and green infrastructure that will have positive effects for both biodiversity and human health.
- 8.4 The Equality Impact Assessment (EqIA) found that the Cheltenham Local Plan is unlikely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and as a result a full EqIA will not be required. The Habitats Regulations Assessment (HRA) found that the Cheltenham Local Plan is considered unlikely to have significant effects on any European sites, alone or in-combination with other plans and projects.

Consultation & Next Steps

- 8.5 The Cheltenham Local Plan and its accompanying IA documents are provided for Regulation 19 consultation through the Council's website www.cheltenham.gov.uk during January to March 2018. Comments made will be taken into consideration in preparing the Submission Plan that will be submitted to the Secretary of State for independent examination later in 2018.

Glossary & Abbreviations

MR	Monitoring Report - Government requires local planning authorities to produce annual Monitoring Reports (MRs) relating to Local Plans. According to Government guidance, these need to include the findings of SA monitoring.
AONB	Area of Outstanding Natural Beauty. A landscape area of high natural beauty which has special status, and within which major development will not be permitted, unless there are exceptional circumstances. Designated under the 1949 National Parks and Access to Countryside Act.
Compatibility Analysis	The comparison of the vision and strategic objectives against the SA Framework.
Cumulative Effects	The effects that result from changes caused by a project, plan, programme or policy in association with other past, present or reasonably foreseeable future plans and actions. Cumulative effects are specifically noted in the SEA Directive in order to emphasise the need for broad and comprehensive information regarding the effects.
EqlA	Equality Impact Assessment - a process of analysing a proposed or existing service, strategy, policy or project. The aim is to identify any effect or likely effect on different groups within the community. The outcome is to make sure that, as far as possible, any negative consequences for minority groups are eliminated or minimised and opportunities for promoting equality are maximised.
Green Infrastructure	Green Infrastructure (GI) is a network of high quality green and blue spaces and other environmental features. It is designed and managed as a multifunctional resource capable of delivering a wide range of environmental and quality of life benefits (ecosystem services) for local communities. Green Infrastructure includes parks, open spaces, playing fields, woodlands, wetlands, grasslands, river and canal corridors allotments and private gardens.
HIA	Health Impact Assessment - is a practical approach that determines how a proposal will affect people's health. Recommendations to 'increase the positive' and 'decrease the negative' aspects of the proposal are produced to inform decision-makers.
HRA	Habitats Regulations Assessment - The European Directive (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna (the Habitats Directive) protects habitats and species of European nature conservation importance. The Habitats Directive establishes a network of internationally important sites designated for their ecological status. These are referred to as Natura 2000 sites or European Sites, and comprise Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).
Indicator	A means by which change in a system or to an objective can be measured.
LEP	Local Enterprise Partnership
Mitigation	Measures to avoid, reduce or offset the significant adverse effects of the plan on sustainability.
Monitoring	Activities undertaken after the decision is made to adopt the plan or programme to examine its implementation. For example, monitoring to examine whether the significant sustainability effects occur as predicted or to establish whether mitigation measures are implemented.
Objective	A statement of what is intended, specifying the desired direction of change.
SA	Sustainability Appraisal - A process by which the economic, social and environmental impacts of a project, strategy or plan are assessed.
SA Framework	The SA Framework provides the basis by which the sustainability effects of the emerging development planning document will be described, analysed and compared. It includes a number of sustainability objectives, elaborated by 'decision-aiding questions'.
Scoping	The process of deciding the scope and level of detail of the SEA. This also includes defining the environmental / sustainability effects and alternatives that need to be considered, the assessment methods to be used, the structure and contents of the

- Environmental / Sustainability Report.
- Screening** The process of deciding whether a plan or programme requires SEA or an Appropriate Assessment.
- SEA** Strategic Environmental Assessment - systematic method of considering the likely effects on the environment of policies, plans and programmes.
- SEA Directive** Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment".
- SFRA** Strategic Flood Risk Assessment - Detailed and robust assessment of the extent and nature of the risk of flooding in an area and its implications for land use planning. Can set the criteria for the submission of planning applications in the future and for guiding subsequent development control decisions. SFRA's inform sustainability appraisal.
- Sustainability Appraisal** A systematic assessment process designed to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of spatial development planning documents.
- SSSI** Site of Special Scientific Interest - Areas of high quality habitat (or geological features) of regional, national or international nature conservation importance, designated by English Nature.
- Target** A specified desired end, stated usually within a specified time-scale.

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The Cheltenham Plan

**INTEGRATED APPRAISAL
(Sustainability Appraisal; Strategic
Environmental Assessment; Health Impact
Assessment & Equality Impact
Assessment)**

November 2017

Appendices

Cheltenham Borough Council

The Cheltenham Plan: Regulation 19

INTEGRATED APPRAISAL (IA)

Sustainability Appraisal (SA); Strategic Environmental Assessment (SEA); Health Impact Assessment (HIA); Equality Impact Assessment (EqIA)

Appendices

- I Statement of Compliance with SEA Directive & Regulations**
- II Cheltenham Borough Local Plan IA Final Scoping Report**
- III Baseline Information**
- IV Plans and Programmes Review**
- V IA Consultation Representations and Responses (2016 &**
- VI 2017)**
- VII IA Compatibility Analysis of Vision and Objectives**
- VII IA of Site Options (2016 & updated 2017)**
- I Equalities Impact Assessment (EqIA) Screening Report (2016 & Updated 2017)**
 - Appendix I of Appendix VIII - EqIA Plans and Programmes Review**
 - Appendix II of Appendix VIII - EqIA Screening Summary Assessment**

Please note that Appendices II, III & IV are available on the Council's website

Appendix I: Statement on Compliance with SEA Directive & Regulations

The EU SEA Directive¹ (Annex 1) requires certain information to be provided in the Environmental Report. This requirement is implemented into UK legislation through the SEA Regulations (2004)². This is Appendix I of the Integrated (Sustainability) Report that constitutes the Environmental Report as required by the SEA Directive and the UK SEA Regulations.

This Appendix I sets out how the requirements for SEA have been met and signposts where this information is found in the Integrated (Sustainability) Appraisal Report (November 2017) accompanying the Draft Cheltenham Plan on Regulation 19 consultation –and in accordance with paragraph 165 of the National Planning Policy Framework (2012)³.

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans 	Section 1 Introduction	<ul style="list-style-type: none"> Sets out the vision and main objectives of Draft Cheltenham Borough Local Plan.
	Section 3 Context & Baseline	<ul style="list-style-type: none"> Summarises the relationship with other relevant plans and the implications for the Draft Cheltenham Borough Local Plan.
<ul style="list-style-type: none"> The relevant aspects of the current state of the environment and the likely evolution thereof without the implementation of the plan 	Section 3 Context & Baseline	<ul style="list-style-type: none"> Summarises the relevant baseline conditions for sustainability (including the state of relevant environmental aspects) in the Cheltenham Borough Plan area, and likely evolution without the Plan.
<ul style="list-style-type: none"> The environmental characteristics of the area likely to be affected 	Section 3 Context & Baseline	<ul style="list-style-type: none"> Summarised in Section 3 of Main IA Report.
<ul style="list-style-type: none"> Any existing environmental problems which are relevant to the 	Section 3 Context &	<ul style="list-style-type: none"> Summarises existing sustainability (including environmental problems) for the Cheltenham Borough Plan area.

¹ <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

² <http://www.parliament.uk/documents/post/postpn223.pdf>

³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
plan including, in particular, those in relation to any areas of a particular environmental importance	Baseline	
<ul style="list-style-type: none"> The environmental protection objectives relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation 	Section 2 IA Methods Section 3 Context & Baseline	<ul style="list-style-type: none"> Provides the summary of objectives for sustainability in the Cheltenham Borough Plan area (including environmental objectives) and the implications of these objectives for the Draft Cheltenham Borough Local Plan. Detailed IA Framework guiding assessment of effects against the Objectives.
<ul style="list-style-type: none"> The likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects 	Section 2 IA Methods Table 2.1	<ul style="list-style-type: none"> Presents the IA Framework of objectives that shows which of the issues listed by the SEA Regulations are progressed by which IA objectives. This ensures that all of the issues are considered during the assessment of each element of the Draft Cheltenham Borough Local Plan. All policies and site allocations are assessed against IA objectives.
	Section 5 & 6 Appendices III to V	<ul style="list-style-type: none"> Summarises the likely significant effects of implementing the Draft Cheltenham Borough Local Plan Part 1 with details provided in the appendices. Where possible, an indication is given of whether the effect is likely to be cumulative, short, medium and long term
<ul style="list-style-type: none"> The measures envisaged to prevent, reduce and as fully as possible offset any significant 	Section 5 & 6 Appendices III to V	<ul style="list-style-type: none"> Where potential significant negative effects are predicted the IA has sought to provide suggestions for mitigation possibilities. These are provided in Section 5 of the IA Report and in the

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
adverse effects on the environment of implementing the plan		appraisal matrices (appendices).
<ul style="list-style-type: none"> ▪ An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information 	Sections 4, 5 & 6 Appendix VII Table 5.1	<ul style="list-style-type: none"> ▪ The potential site allocations were appraised through IA (Appendix VII). The reasons for progressing options & not taking others forward is set out in Table 5.1.
	Sections 2 & 3 Methods & Context, Baseline	<ul style="list-style-type: none"> ▪ Outlines how the assessment was undertaken – the appraisal methodology and difficulties encountered in compiling information are noted.
<ul style="list-style-type: none"> ▪ A description of the measures envisaged concerning monitoring 	Section 7	<ul style="list-style-type: none"> ▪ Provides measures proposed for monitoring the sustainability (and environmental) effects of the implementation of the Draft Cheltenham Borough Local Plan.
<ul style="list-style-type: none"> ▪ A non-technical summary of the information provided under the above headings 	Report preface (available separately)	<ul style="list-style-type: none"> ▪ Provides a non-technical summary.

**The Cheltenham Plan (Part One Preferred Options) Consultation (6 February to 20 March 2017)
Issues raised on the Sustainability Appraisal (SA) & Habitats Regulations Assessment (HRA) Reports (October 2016)
accompanying the draft Cheltenham Plan Part One Preferred Options published for public consultation October 2016**

Consultee	SA or HRA Issue Raised	Summary Draft Response
Environment Agency	Evidence: Previously advised that a Level 2 SFRA & Sequential Test, as well as a foul drainage infrastructure assessment (as part of an IDP), should be undertaken to inform site selection.	Noted. The SA used Defra Magic flood risk maps as evidence at this stage of the assessment and plan-making.
	Previously advised that we would advocate Local Plan Policy in relation to flood risk, land contamination and remediation, the Water Framework Directive (WFD), foul drainage provision, biodiversity and habitat creation, climate change, water use and resource, and renewable energy. We consider the Plan does not currently contain sufficient environmental protection and enhancement policies. Acknowledges the link to the JCS & its Policies.	SA Objective No 9 relates to water resources & quality, referring to water safeguarded & water protection zones.
	Concern re flood risk for sites CP023, CP068/69, CP038, CP075 It is unclear what Flood Zone information has been used to inform the Local Plan - flood risk has not been added to CP018, CP070 and CP085 for example. The Local Plan makes no reference to the standard of protection of the Cheltenham Flood Alleviation Scheme (FAS). Whilst this FAS does reduce flood risk in the town centre it should be noted that its presence cannot be relied upon to facilitate new development (i.e. the floodplain without the benefit of the defences should be assessed). Also, previously advised 5	The SA used Defra Magic flood risk maps as evidence at this stage of the assessment and plan-making.

	potential FASs in Cheltenham – need to be considered.	
	It is important that land contamination is also considered when allocating sites. Firstly, we would seek confirmation of what evidence base sources/ data sets have been used when considering site allocations.	SA Objective No 14 considered BMVL and greenfield/pdf, with any comments on contamination if known from previous use.
	All river waterbodies are not currently meeting the required status of good ecological quality under WFD. There are development sites proposed, particularly the larger ones such as Land at Arle Nurseries and Land at Leckhampton, where there will be good opportunities for ecological and water quality enhancement.	Specific reference to the quality status of waterbodies under WFD can be included in the next stage of plan-making and assessment. The SA recommended opportunities for biodiversity enhancement through policy wording, for example, CP037 & CP034 (Arle Nurseries) – more details can be considered at the next stage of plan-making and assessment.
	SA: no specific comments at this stage although any omissions in evidence, such as SFRA Level 2, should be reported in the SA.	Noted, with thanks.
	HRA: expect NE to lead on this but to note that EA referred to foul drainage infrastructure/IDP as part of the JCS process & will expect the CP to ensure appropriate & timely delivery.	Noted, with thanks.
Natural England	HRA Screening: NE does not agree with the conclusion of no likely significant effects with regard to the Cotswold Beechwoods Special Area of Conservation (SAC). The Cheltenham Plan area is approximately 5km from the Cotswold Beechwoods SAC. Whilst we note that the majority of the site allocations are over 10km from the Cotswold Beechwoods SAC, as yet there is no strategic understanding of where visitors come from and how they use the SAC, no established zone of influence for recreational pressure and no mitigation	The HRA of the Cheltenham Plan has to follow the HRA of the JCS. Any further discussions and surveys required in order to establish the nature and scale of impacts from recreational pressures arising through the JCS, together with agreement on an appropriate mitigation plan, will be taken into account at the next stage of plan-making and assessment.

	<p>plan. In combination impacts must also be considered. Without this information, it is not possible to reach a conclusion of no likely significant effects from the Cheltenham Plan based on distance alone.</p> <p>We welcome the plan's Local Green Space policy, particularly the identification of sites for Local Greenspace Designation. However, these local green spaces cannot be assumed to provide mitigation for recreational pressure on the SAC; the sites are local rather than strategic and have not been assessed or selected with this purpose in mind. In addition, there is an emphasis on the protection of existing sites rather than their improvement or the creation of new sites to absorb the additional need generated through growth. We therefore do not agree with the HRA's conclusion that the green space policies mitigate against additional recreational pressure on the Cotswold Beechwoods SAC to allow a conclusion of no likely significant effects.</p> <p>In the absence of visitor surveys, partnership discussions and an agreed mitigation plan, it is difficult to justify a conclusion of no likely significant effects on the Cotswold Beechwoods SAC as a result of the Cheltenham Plan. As a step towards this, we recommend that the plan goes further to secure the delivery of strategic green infrastructure.</p> <p>The examination of the JCS considered the issue of recreational impacts on the Cotswold Beechwoods SAC in some detail, through an addendum to its HRA (May 2015) and the subsequent production of a Statement of Cooperation between the JCS authorities and Natural England. All parties agreed that any significant effects of the JCS on the SAC due to</p>	
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	<p>increased recreation are capable of being addressed through mitigation. The JCS sets out a possible route for this mitigation, through green infrastructure and developer contributions for site management. It therefore puts the necessary hooks in place to allow this to happen, but further work is required to understand the issue and deliver appropriate mitigation.</p> <p>As part of the examination for the JCS, it was agreed that further discussions and surveys were required in order to establish the nature and scale of impacts and an appropriate mitigation plan needed to be agreed. The JCS authorities committed to working in partnership and Natural England to bring this about, but as of yet there has been no progress on this matter. We recommend that the Local Authorities now start this process.</p>	
<p>Historic England</p>	<p>HE does not consider that the JCS does, in itself, provides an adequate positive strategy, or policy, for the conservation, protection and enhancement of Cheltenham's historic environment – and HE recommends a specific heritage policy within the Cheltenham Local Plan.</p>	<p>Noted – matter for plan-making.</p>
<p>Highways England</p>	<p>The Draft Plan provides limited information on transport, beyond comments that some development sites are located with good access to the SRN. Whilst it aligns with the vision and land-use strategy of the JCS, a transport strategy has yet to be finalised for the JCS. HE not in a position to support an all-movement M5 J10 at this time, and further modelling / evidence is required.</p>	<p>Noted – matter for plan-making.</p>

	<p>Beyond simple site selection criteria, Highways England is not aware of any transport studies have been undertaken, beyond those informing the JCS development process. In terms of JCS modelling, this is still to be completed. Gaps remain in the Draft Plan and JCS transport evidence base at this time.</p>	
<p>Robert Hitchins Ltd</p>	<p>SA Report (October 2016) does not include a comparative assessment of potential sites & is not transparent. Table 5.1 sets out reasons for dismissing sites including SALA found option not deliverable or developable – no comparative assessment against the SA criteria.</p>	<p>The SA has an important role to play in plan-making by helping to identify, refine and assess reasonable alternatives. There is no definition in the SA Regulations for “reasonable alternatives” but Government guidance on SA/SEA advises this to mean suitable and deliverable within the plan period.</p> <p>It is the plan-making authority that is the primary decision-maker in relation to identifying what is to be regarded as a reasonable alternative. This was further confirmed in the High Court Judgment FoE v Welsh Ministers (March 2015) that the evaluation of which alternatives should be included is a matter primarily for the decision-making authority.</p> <p>Whilst the SA findings inform plan-making, they are not the sole source of information for decision-making. The SA is only required to carry out a (comparative) assessment using the SA objectives/criteria of those options that are considered to be reasonable. Table 5.1 sets out the reasons for selection or rejection of site options. Comparative assessment undertaken and reported in Appendix VII; summary findings to be included in main text to present explicitly that comparative assessment made.</p>

RPS Planning	SO41 – although JCS Inspector has motioned to remove from the Green Belt, the Council's SALA & SA (page 50) consider the site not deliverable or developable. The site should therefore be excluded from later stages of plan making.	Noted – matter for plan-making.
	Land at Leckhampton: could be increased from 200 to 370 homes and Land at Arle Nurseries reduced from 200 to 0 homes.	Noted – matter for plan-making.
Anne Griffiths	It is essential that the LP carries out a full Health Impact Assessment to address well recorded concerns are in respect of unacceptable levels of air or soil pollution, odours both alone or cumulatively. Improvements need to be to connectivity of the various transport modes, eg cycling, car, bus coach, and train by establishing a central transport hub to connect all modes of transport. Also, there is a need to improve radial pedestrian and cycle routes across the town, to encourage non-car based movement.	Noted and agreed. The SA Framework includes consideration of Health/Well-being (No 3), Transport & Traffic (Nos 5&6), Air Quality (No 7), Water (No 8) and Soils (No 14); and the SA considers the cumulative effects of the emerging elements of the draft Plan.
	This LP should ensure that the best quality land around Cheltenham which is protected to ensure that it continues to be used in agriculture, for food production and food security, as well as being used as a green buffer to improve air quality, by retaining the Green Belt and establishing Local Green Space, which will encourage access to the countryside.	Note and agreed.
Mary Nelson	When and how is air pollution to be recognised and tackled in the Local Plan? Cheltenham is already an AQMA, and is to be subjected to massive urban extensions. There is an unrealistic reliance upon modal	Noted – matter for plan-making. The SA Framework includes consideration of Health/Well-being (No 3), Transport & Traffic (Nos 5&6), and Air Quality (No 7).

	shift in the JCS evidence, which at best will only be around 4%. Cheltenham has a difficult road lay out, with no proper ring roads, and increased congestion from the urban extensions is a certainty.	

APPENDIX VI: COMPATIBILITY ANALYSIS SA OF THE DRAFT CHELTENHAM PLAN VISION AND OBJECTIVES

Key:

Neutral	○
Very Compatible	++
Compatible	+
Uncertain	?
Incompatible	-
Very Incompatible	--

Draft Cheltenham Borough Local Plan Vision Theme A:

“Cheltenham is a place where people live in strong, safe, healthy, well-served and well-connected communities”

IA No.	IA Objective	Compatibility Analysis
1	Ensure everyone has access to a high quality home that they can afford and that meets their needs.	++
2	Ensure the availability of employment land and premises to encourage inward investment and support the growth of existing businesses and the vitality of the town and its suburbs.	++
3	Support communities with inclusive design, promote healthy lifestyles and reduce inequalities in wellbeing and opportunity.	++
4	Improve provision and accessibility to services and facilities, including health and educational facilities.	++
5	Maximise the use of sustainable modes of transport and reduce the need to travel by car	++
6	To ensure safety and ease of access to the existing road network, and ensure that there is capacity to accommodate growth.	++
7	To reduce the contribution to climate change and reduce the contribution to atmospheric pollution, including greenhouse gases.	++
8	To reduce the demand for water, and maintain and improve the quality of water	++
9	To manage and reduce flood risk.	++
10	To safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats.	+
11	Protect and improve the quality of the townscape and the broader landscape setting.	+
12	To protect and enhance the area's distinctive historic environment, including known and potential archaeological sites, designated and non-designated heritage assets and their setting, in a manner appropriate to their significance.	+
13	To protect and enhance the area's distinctive qualities that form part of the attraction to and fondness for the area.	+
14	Minimise the use of natural resources including soil and greenfield land, protect safeguarded mineral resources, and soil quality.	+

Summary:

The Draft Cheltenham Borough Local Plan Vision Theme A is compatible with all of the IA Objectives, particularly those relating directly to settlements, settlement infrastructure and settlement connectivity.

IA Recommendation(s): No recommendation.

Draft Cheltenham Borough Local Plan Objectives Theme A:

- a) Recognise the local distinctiveness of Cheltenham's various neighbourhoods and deliver regeneration where appropriate;
- b) Ensure provision of sufficient housing land and other opportunities for residential development that meets the needs of the current and future population of the Borough;
- c) Understand what people need from the places where they live and work to help create socially sustainable communities via local models;
- d) Ensure that new communities are integrated with neighbouring communities to promote cohesion and reduce social isolation;
- e) Enable investment in schools, healthcare and other community facilities and meeting places in order to support new and existing communities;
- f) Increase opportunities for sport and active leisure, particularly in areas of under-provision;
- g) Ensure that places are designed in a way that is accessible to all and promotes walking, cycling and use of public transport;
- h) Support a network of neighbourhood centres that provide an appropriate range of local amenities to support sustainable communities; and
- i) Ensure that new development protects public safety and amenity and creates environments that contribute to reducing crime and fear of crime.

Draft Cheltenham LP Objectives (Theme A)	Integrated Appraisal Objectives													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
A	+	++	++	+	+	0	+	?	0	0	++	++	++	++
B	++	0	++	+	0	0	?	?	?	?	?	?	+	?
C	+	++	++	++	+	+	0	0	0	0	+	+	++	0
D	+	0	++	++	+	+	0	0	0	0	0	0	0	0
E	+	0	++	++	+	0	0	?	0	0	?	0	0	?
F	+	0	++	++	+	0	0	0	0	0	+	0	0	0
G	+	++	++	++	++	++	++	0	0	0	+	0	0	0
H	+	++	++	++	++	0	++	0	0	0	0	0	0	0
I	+	+	++	+	+	0	+	0	0	0	+	0	+	0

Summary:

The Draft Cheltenham Borough Local Plan Theme A Objectives are compatible with the majority of the IA Objectives, particularly IA Objectives relating to the provision of housing, employment and infrastructure and Objectives that seek to reduce inequalities. Some of the Theme A Objectives are very specific and therefore only relate to certain IA topics, as such these are likely to have a neutral effect on a number of other IA Objectives.

Overall, the IA found that each of the Theme A Objectives are compatible with at least one of all the IA Objectives which means that each Theme A objective is contributing to sustainable development to a certain extent. Given the complex inter-relationships between objectives, some uncertainties do exist; for example, the delivery of new housing has the potential to affect water resources and quality, flood risk, townscape, biodiversity and historic heritage settings. Positive effects will be dependent on further objectives that seek to minimise potential negative effects and maximise positive effects, for example objectives that seek to reduce demand for water resources and objectives that seek high quality design.

IA Recommendation(s): To reduce uncertainties, Theme A Objective B could be expanded to include wording that seeks to minimise effects on the natural environment whilst meeting housing needs. For example,

'Ensure provision of sufficient housing land and other opportunities for residential development that meets the needs of the current and future population of the Borough, whilst minimising the impacts of development on the natural environment'

Draft Cheltenham Borough Local Plan Vision Theme B:

“Cheltenham is a place with a prosperous and enterprising economy where education and employment opportunities are increasing and diversifying, where businesses choose to invest and where the benefits are felt by all”

IA No.	IA Objective	Compatibility Analysis
1	Ensure everyone has access to a high quality home that they can afford and that meets their needs.	0
2	Ensure the availability of employment land and premises to encourage inward investment and support the growth of existing businesses and the vitality of the town and its suburbs.	++
3	Support communities with inclusive design, promote healthy lifestyles and reduce inequalities in wellbeing and opportunity.	++
4	Improve provision and accessibility to services and facilities, including health and educational facilities.	++
5	Maximise the use of sustainable modes of transport and reduce the need to travel by car	0
6	To ensure safety and ease of access to the existing road network, and ensure that there is capacity to accommodate growth.	0
7	To reduce the contribution to climate change and reduce the contribution to atmospheric pollution, including greenhouse gases.	0
8	To reduce the demand for water, and maintain and improve the quality of water	0
9	To manage and reduce flood risk.	0
10	To safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats.	0
11	Protect and improve the quality of the townscape and the broader landscape setting.	0
12	To protect and enhance the area's distinctive historic environment, including known and potential archaeological sites, designated and non-designated heritage assets and their setting, in a manner appropriate to their significance.	0
13	To protect and enhance the area's distinctive qualities that form part of the attraction to and fondness for the area.	+

14	Minimise the use of natural resources including soil and greenfield land, protect safeguarded mineral resources, and soil quality.	0
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Summary:

The Draft Cheltenham Borough Local Plan Vision Theme B is very specific to the economy and employment and educational opportunities, as such the Theme B Vision is strongly compatible with IA Objectives relating to the economy and education, and can support a reduction in inequalities. Given that it is so specific however, it is unlikely to affect the majority of IA Objectives.

IA Recommendation(s): No recommendation.

Draft Cheltenham Borough Local Plan Objectives Theme B:

- a) Ensure provision of sufficient employment land and other opportunities for economic development to attract new businesses and to enable existing businesses to grow and develop within Cheltenham;
- b) Promote the development of adaptable and flexible employment space within Cheltenham so that sites and buildings can be re-used with minimal environmental impact;
- c) Assist in developing and maintaining an attractive retail offer in the town centre and other designated centres;
- d) Encourage the delivery of sustainable transport infrastructure, a range of transport options and better links across the Borough including parking provision and public transport;
- e) Encourage knowledge-intensive services businesses in high value sectors; and
- f) Support development of Cheltenham's educational facilities to ensure that the young people have access to a wide range of opportunities.

Draft Cheltenham LP Objectives (Theme B)	Integrated Appraisal Objectives													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
A	0	++	+	0	0	0	?	?	?	?	?	?	+	?
B	0	++	+	0	0	+	+	+	+	+	++	+	+	+

Draft Cheltenham LP Objectives (Theme B)	Integrated Appraisal Objectives													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
C	0	++	+	++	0	+	0	0	0	0	+	0	+	+
D	0	++	++	++	++	++	++	0	0	0	0	0	+	0
E	0	++	+	0	0	0	0	0	0	0	0	0	+	0
F	0	++	+	++	0	0	0	0	0	0	0	0	+	0

Summary:

The Draft Cheltenham Borough Local Plan Theme B Vision and Objectives are very specific to the economy and employment and educational opportunities, as such the Theme B Objectives are unlikely to have an effect on the majority of the IA Objectives. The Theme B Objectives are highly compatible with IA Objectives relating to the economy, employment and education, as well as IA Objectives to reduce inequalities. Theme B Objective B seeks to re-use buildings and minimize impacts on the environment, as this Objective encompasses environmental considerations it is considered compatible with the majority of IA Objectives.

Overall, the IA found that each of the Theme B Objectives are compatible with at least one of all the IA Objectives which means that each Theme B objective is contributing to sustainable development to a certain extent. Given the complex inter-relationships between objectives, some uncertainties do exist; for example, the delivery of new employment land has the potential to affect water resources and quality, flood risk, townscape, biodiversity and historic heritage settings. Positive effects will be dependent on further objectives that seek to minimize potential negative effects and maximize positive effects, for example objectives that seek to reduce demand for water resources and objectives that seek high quality design.

IA Recommendation(s): To reduce uncertainties, Theme B Objective A could be expanded to include wording that seeks to minimise effects on the natural environment whilst delivering new employment land. For example,

'Ensure provision of sufficient employment land and other opportunities for economic development to attract new businesses and to enable existing businesses to grow and develop within Cheltenham, whilst minimising the impacts of development on the natural environment'

Draft Cheltenham Borough Local Plan Vision Theme C:

“Cheltenham is a place where the quality and sustainability of our cultural assets and natural and built environment are valued and recognised locally, nationally and internationally and tourists choose to visit and return to”

IA No.	IA Objective	Compatibility Analysis
1	Ensure everyone has access to a high quality home that they can afford and that meets their needs.	+
2	Ensure the availability of employment land and premises to encourage inward investment and support the growth of existing businesses and the vitality of the town and its suburbs.	+
3	Support communities with inclusive design, promote healthy lifestyles and reduce inequalities in wellbeing and opportunity.	+
4	Improve provision and accessibility to services and facilities, including health and educational facilities.	+
5	Maximise the use of sustainable modes of transport and reduce the need to travel by car	+
6	To ensure safety and ease of access to the existing road network, and ensure that there is capacity to accommodate growth.	+
7	To reduce the contribution to climate change and reduce the contribution to atmospheric pollution, including greenhouse gases.	+
8	To reduce the demand for water, and maintain and improve the quality of water	++
9	To manage and reduce flood risk.	+
10	To safeguard and enhance biodiversity and improve connectivity between green spaces and functional habitats.	++
11	Protect and improve the quality of the townscape and the broader landscape setting.	++
12	To protect and enhance the area's distinctive historic environment, including known and potential archaeological sites, designated and non-designated heritage assets and their setting, in a manner appropriate to their significance.	++
13	To protect and enhance the area's distinctive qualities that form part of the attraction to and fondness for the area.	++

14	Minimise the use of natural resources including soil and greenfield land, protect safeguarded mineral resources, and soil quality.	++
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Summary:

The Draft Cheltenham Borough Local Plan Vision Theme C is compatible with all of the IA Objectives, particularly those relating to environmental considerations, which is not surprising given that the theme seeks to place value on quality and sustainability in both the natural and built environment.

IA Recommendation(s): No recommendation.

Draft Cheltenham Borough Local Plan Objectives Theme C:

- a) Conserve and enhance Cheltenham's architectural, townscape and landscape heritage, particularly within the town's conservation areas;
- b) Conserve, manage and enhance Cheltenham's natural environment and biodiversity;
- c) Support development of Cheltenham's sporting, cultural, arts and tourism infrastructure (including public art) to ensure that the Borough maintains its reputation as a cultural destination and continues to be an attractive place to visit;
- d) Address the challenge of climate change, ensuring that development meets high design and sustainability standards and is built to be adaptable over the long term;
- e) Create a walkable network of interconnected, multifunctional green spaces that link with the wider countryside;
- f) Support provision, maintenance and continued investment in a high quality public and private realm, including formal and informal green spaces and private gardens that contribute to local amenity and wildlife biodiversity; and
- g) Manage and reduce the risk of flooding within the Borough.

Draft Cheltenham LP Objectives (Theme C)	Integrated Appraisal Objectives													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
A	+	+	+	0	0	0	0	0	0	0	++	++	++	0
B	0	0	+	0	0	0	+	++	+	++	++	0	++	++
C	0	+	+	0	0	0	0	0	0	0	++	+	++	0
D	++	+	++	+	+	+	++	++	+	+	++	0	++	+
E	0	0	++	+	+	0	+	+	+	++	++	0	++	+
F	++	+	++	0	+	0	+	0	0	++	++	+	++	0
G	+	0	0	0	0	0	+	+	++	+	+	0	+	0

Summary:

The Draft Cheltenham Borough Local Plan Theme C Objectives are compatible with the majority of the IA Objectives, particularly IA Objectives relating to the protection and enhancement of the natural environment, and the promotion of healthy lifestyles. Some of the Theme C Objectives are very specific and therefore only relate to certain IA topics, as such these are likely to have a neutral effect on a number of other IA Objectives.

Overall, the IA found that each of the Theme C Objectives are compatible with at least one of all the IA Objectives which means that each Theme C objective is contributing to sustainable development to a certain extent.

IA Recommendation(s): No recommendation.

Appendix VII: SA of Site Options (October 2016 & October 2017)

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Cheltenham Borough Local Plan Site Options

All Saints	13
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Significance Key:

Categories of Significance		
Symbol	Meaning	Sustainability Effect
- -	Major Negative	Problematical and improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive
-	Minor negative	Potential sustainability issues: mitigation and/or negotiation possible
+	Minor positive	No sustainability constraints and development acceptable
++	Major Positive	Development encouraged as would resolve existing sustainability problem
?	Uncertain	Uncertain or Unknown Effects
0	Neutral	Neutral effect
- ?	It is also possible to have two symbols for an SA Objective. For example, A development could have the potential for a minor negative effect against SA Objective 10 (Biodiversity); however, there is an element of uncertainty until lower level assessments have been carried out.	
+ -	SA Objective 2, 5 & 11 consider more than one topic and as a result development at a site could have a different effect upon each topic considered. For example, against SA Objective 5 a site option might be located in close proximity to strategic footpaths / cycle routes with the potential for positive effects on access to sustainable transport modes, however it may also be located beyond reasonable walking distance to the nearest train station with the potential for negative effects on access to sustainable transport modes.	

Sustainability (Integrated) Appraisal Objectives Summary Key:

SA Objective	Description
1	Housing: The nature and significance of the effects against this SA Objective will primarily relate to capacity of the site to accommodate housing development, and the timescale for delivery. Those site that can be delivered in the immediate term are considered to have a significant positive effect as it addresses the backlog in housing delivery.
2	Economy, Employment and Tourism: This SA Objective considers two separate topics. The nature and significance of the effects against this SA Objective will primarily relate to: a) the capacity of the site to accommodate employment land, and the potential loss of existing employment; and b) the distance of the site option from existing employment areas.
3	Healthy Communities: The nature and significance of the effects against this SA Objective will primarily relate to neighbouring land uses and access to green/open space, or the loss of green/open space as a result of development.
4	Access to Services and Facilities: The nature and significance of the effects against this SA Objective will primarily relate to the accessibility of a range of services and facilities including; supermarket, post office, library, primary school, secondary school, children's centre, GP, Pharmacy, A&E/MIU and fitness centre.
5	Access to Sustainable Transport Modes: This SA Objective considers two separate topics. The nature and significance of the effects against this SA Objective will primarily relate to: a) access to existing modes of public transport; and b) access to existing strategic pedestrian and cycle routes.
6	Traffic: The nature and significance of the effects against this SA Objective will primarily relate to traffic impacts, road capacity and site access.
7	Air Quality and Climate Change: The nature and significance of the effects against this SA Objective will primarily relate to emissions.
8	Water Resources and Quality: The nature and significance of the effects against this SA Objective will depend on whether the site option lies within a Surface Water Safeguard Zone, Groundwater Safeguard Zone, Groundwater Source Protection Zone, Groundwater Vulnerability Zone or Water Protection Zone.
9	Flooding: The nature and significance of the effects against this SA Objective will primarily relate to flood risk.
10	Biodiversity: The nature and significance of the effects against this SA Objective will primarily relate to potential effects on designated biodiversity.
11	Landscapes and Townscapes: This SA Objective considers two separate topics. The nature and significance of the effects against this SA Objective will primarily relate to a) the landscape sensitivity of the site option and whether it is located within the AONB, and b) whether the site option is located within the Green Belt.
12	Historic Environment: The nature and significance of the effects against this SA Objective will primarily relate to designated heritage assets and their settings.
13	Cultural Heritage: The nature and significance of the effects against this SA Objective will primarily relate to
14	Land and Soils: The nature and significance of the effects against this SA Objective will primarily relate to the loss of best and most versatile agricultural land, and the nature of the site as either greenfield land or previously developed land.

SA Summary Table																		
Site Option	SA Objective																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
ALL SAINTS																		
CP071: Bences Timber Yard, St Johns Ave.	+	+	++	+	+	+	+	0?	0?	-	+	+	+	+	0	?	++	
CP072: Sherborne Place Car Park	+	+	++	+	+	+	+	0?	0?	-	+	+	+	+	0	?	++	
CP073: Axiom, Winchcombe St	++	+	++	+	+	+	+	-?	-?	-	+	+	++	+	+	?	++	
CP095: St James's St Car Park	+	+	++	+	+	+	+	-?	0?	-	+	+	+	+	0	?	++	
BATTLEDOWN																		
CP024: Castle Dream Stud, Mill Lane	+	0	--	-	--	--	+	0?	0?	0	+	+	+	--	+	0	?	-
CP025: Land at Mill Lane	+	0	--	-	--	--	+	0?	0?	0	+	+	+	--	+	0	?	-
CP026: Land north of Greenway Lane	+	0	--	+	--	+	+	0?	0?	0	+	+	+	--	+	0	?	-
CP027: Land south of Greenway Lane	+	0	--	+	--	+	+	0?	0?	-	+	-	--	+	0	?	-	
CP028: Land adjacent to Orchard Cottages	+	0	--	-	-	+	+	-?	0?	0	+	+	--	+	0	?	-	
CP029: Land south of Glenfall Way	+	0	--	+	-	+	+	0?	0?	-	+	+	--	+	0	?	-	
CP064: King Alfred Way 1 & 2	++	++	++	+	-?	+	+	-?	-?	0	+	+	++	+	0	?	++	
CP065: St Edwards Car Park, London Rd	+	+	++	+	-	+	+	0?	0?	-	+	+	+	+	0	?	++	
CP100: Battledown	++ ?	++ ?	+	+	--?	+	+	-?	-?	0	+	+	--	+	-	?	-	
BENHALL & THE REDDINGS																		
CP043: Land at The Reddings, north of Branch Rd	++	++	++	+	--?	-	++	--?	--?	0	+	+	-	--	0	?	-	

SA Summary Table																		
Site Option	SA Objective																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
CP044: Land at The Reddings, south of Branch Rd	++ ?	++ ?	+	+	-- ?	--	++	-- ?	-- ?	0	+	+	+	-	--	0	?	-
CP045: Land at the Hayloft (west), The Reddings/Badgeworth Rd	++	++	--	--	-- ?	--	+	-- ?	-- ?	0	+	+	+	-	--	0	?	-
CP046: Land at the Hayloft (east), south of The Reddings	++	++	+	--	-- ?	--	+	-- ?	-- ?	0	+	+	+	-	--	0	?	-
CP047: Flowerdale Farm, The Reddings	+	++	+	+	--	-	+	-- ?	-- ?	0	+	+	+	-	--	0	?	-
CP048: Land at Stansby Mobile Home & Caravan Pk, The Reddings	++	++	+	+	-- ?	-	++	-- ?	-- ?	0	+	+	+	+	--	0	?	+
CP049: Land west of Grovesfield Way, The Reddings	+	+	++	+	-	-	++	- ?	- ?	0	+	+	+	-	--	0	?	-
CP050: Land off Grovesfield Way, The Reddings	+	+	++	+	--	-	++	- ?	- ?	0	+	+	+	-	--	0	?	-
CP051: Land r/o Shakespeare Cottages, The Reddings	+	+	++	+	--	-	++	- ?	- ?	0	+	+	+	-	--	0	?	-
CHARLTON KINGS																		
CP030: Land off Timbercombe Lane	+	0	++	+	-	+	+	- ?	0 ?	0	+	-	-	--	+	0	?	-
CHARLTON PARK																		
CP063: Reeves Field, Old Bath Rd	+	++	++	+	-	+	+	0 ?	0 ?	-	+	+	+	-	+	0	?	-
CP102: Spirax Sarco HQ, Charlton House	++	++	++	+	-- ?	+	+	- ?	- ?	-	-	+	+	+	+	0	?	+
COLLEGE																		
CP074: Rodney Rd Car Park, Rodney Rd	+	+	++	+	+	+	+	0 ?	0 ?	-	--	+	+	+	+	0	?	++
CP094: Sandford Lido Car Park	+ ?	+ ?	++	+	+	+	+	- ?	0 ?	-	-	+	+	+	+	0	?	++
HESTER'S WAY																		

SA Summary Table																		
Site Option	SA Objective																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
CP037: Land at Fiddler's Green, adjacent to Hayden	++	++	++	-	-- ?	+	+	-- ?	-- ?	0	+	+	+	-	+	0	?	-
CP038: Land at Golden Valley, Pheasant Lane	++	++	++	+	-- ?	-	++	-- ?	-- ?	-	0	+	+	-	--	0	?	-
CP039: Land north of Bamfurlong Lane	++	++	++	+	-- ?	--	++	-- ?	-- ?	0	+	+	+	-	--	0	?	-
CP040: Briarfields Motel and Touring Park, Bamfurlong Lane	++	++	++	+	-- ?	-	++	-- ?	-- ?	0	+	+	+	+	--	0	?	+
CP041: Land between A40 and Bamfurlong Lane (east)	+	+	++	+	--	-	++	- ?	- ?	0	+	+	+	++	--	0	?	+
CP042: Land between A40 and Bamfurlong Lane (west)	++	++	++	+	-- ?	-	++	-- ?	-- ?	0	+	+	+	-	--	0	?	-
LANSDOWN																		
CP075: Royal Well & Municipal Offices	+	+	++	+	+	+	+	0 ?	0 ?	-	-	+	+	+	+	0	?	+
CP076: St Georges House, Bayshill Rd	++	+	++	+	+	+	+	0 ?	0 ?	0	+	+	+	+	+	+	?	+
CP077: Land at St Georges Place / St James Square	0	+	++	+	+	+	++	0 ?	0 ?	0	--	+	+	++	+	0	?	+
CP078: Rivershill House, St Georges Rd	++	+	++	+	+	+	++	0 ?	0 ?	0	+	+	+	+	+	0	?	++
CP081: Land at Chester Walk Car Park	+	+	++	+	+	+	+	0 ?	0 ?	-	+	+	+	+	+	0	?	++
CP082: Rear of High St Car Park	+	+	++	+	+	+	+	0 ?	0 ?	-	+	+	+	+	+	0	?	++
CP096: St Georges Rd Car Park	+	+	++	+	+	+	+	- ?	0 ?	0	+	+	+	+	+	0	?	++
LECKHAMPTON																		
CP031: Land off Leckhampton Rd	+	+	--	+	-	+	+	- ?	0 ?	-	+	+	+	--	+	0	?	-
CP098: Land south of Collum End Rise	++ ?	++ ?	--	+	+	+	+	- ?	- ?	-	+	+	+	--	--	0	?	-

SA Summary Table																	
Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
OAKLEY																	
CP023: Priors Farm Fields (land at Oakley)	++	0	++	--	- ?	+	+	- ?	- ?	0	+	+	+	+	-	?	-
CP069: Cakebridge Place	+ ?	+ ?	++	+	-	+	+	0 ?	0 ?	-	--	+ ?	+	+	0	?	++
CP070: Land at Prestbury Rd	+	+	++	+	-	+	+	0 ?	0 ?	-	+	+ ?	++	+	0	?	++
CP105: Land at Whaddon Rd	++	0	++	+	-	+	+	0 ?	0 ?	-	0	+ ?	+	+	0	?	++
PARK																	
CP061: Land at Lansdown Rd (Gloucestershire Constabulary HQ)	++	++	+	+	- ?	++	+	-- ?	-- ?	-	+	+ ?	+	+	-	?	++
CP062: Commercial St Car Park	+	+	++	+	+	+	+	0 ?	0 ?	-	+	+ ?	+	+	0	?	+
CP092: Park Campus	++	++	++	+	- ?	+	+	- ?	- ?	-	+	+ ?	+ -	+	-	?	+
CP097: Bath Terrace Car Park	+	+	++	+	+	+	+	- ?	0 ?	-	+	+ ?	+	+	0	?	+
PITTVILLE																	
CP066: Ellerslie Care Home, Albert Rd	++	+	++	+	-	+	+	- ?	- ?	0	+	+ ?	+	+	0	?	++
CP067: Prestbury Rd / Windsor St 1	+	+	++	+	-	+	+	0 ?	0 ?	-	--	+ ?	++	+	0	?	++
CP068: Prestbury Rd / Windsor St 2	+	+	++	+	-	+	+	0 ?	0 ?	-	--	+ ?	+	+	0	?	++
CP088: Pittville School, New Barn Lane	++	0	++	+	-- ?	+	+	-- ?	-- ?	-	+	+ ?	-	+	0	?	-
CP089: Pittville Campus	++	+	++	+	- ?	+	+	-- ?	-- ?	-	+	+ ?	+	+	0	?	++
CP090: Land adjacent to Ellerslie, Albert Rd	++	0	++	+	-	+	+	- ?	- ?	0	+	+ ?	-	+	0	?	-
PRESTBURY																	

SA Summary Table																		
Site Option	SA Objective																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
CP009: Hunting Butts Farm, east of railway cutting	++	++	++	-	-- ?	+	+	-- ?	-- ?	0	+	+	+	+ -	--	0	?	+ -
CP010: Land south of Hunting Butts Farm, Swindon Lane	++	++	++	+	-- ?	+	+	-- ?	-- ?	0	+	+	+	-	--	0	?	-
CP011: The Paddocks, Swindon Lane	+	++	++	+	--	+	+	-- ?	-- ?	0	+	+	+	-	--	0	?	-
CP012: Land at Hunting Butts (east), Evesham Rd	++	++	++	-	-- ?	+	+	-- ?	-- ?	0	+	+	+	-	--	0	?	-
CP013: Cheltenham Racecourse (north)	0	++	++	-	-- ?	+	+	-- ?	-- ?	0	0	+	+	+	--	0	?	++
CP014: Cheltenham Racecourse (south)	++	++	++	+	- ?	+	+	-- ?	-- ?	0	+	+	+	+	--	0	?	++
CP015: Land off New Barn Lane 1 (south of Racecourse)	+	0	++	+	--	+	+	- ?	- ?	0	+	-	-	-	--	0	?	-
CP016: Land off New Barn Lane 2 (south of Racecourse)	+	0	+	+	--	+	+	- ?	- ?	0	+	+	+	-	--	0	?	-
CP017: Land off New Barn Lane 3 (south of Racecourse)	++	0	+	+	-- ?	+	+	-- ?	-- ?	0	+	+	+	-	--	0	?	-
CP018: Land east of Cheltenham Racecourse 1, Lake St	++	++	--	-	- ?	+	+	- ?	- ?	0	0	+	+	--	--	-	?	-
CP019: Land east of Cheltenham Racecourse 2, Park Lane	+	++	--	+	--	-	+	0 ?	0 ?	0	+	+	+	--	--	0	?	-
CP020: Land north of Cheltenham Racecourse	++ ?	++ ?	--	-	-- ?	-	+	-- ?	-- ?	0	+	+	+	--	--	-	?	-
CP021: Land between Cheltenham Racecourse and B4632	++ ?	++ ?	--	-	-- ?	+	+	- ?	- ?	0	+	+	+	--	--	-	?	-
CP022: Land at Prestbury	++	0	--	+	-- ?	+	+	- ?	- ?	-	0	+	+	--	--	-	?	-
CP099: Land at Swindon Lane (adjacent to dismantled line)	+	++	+	+	-	+	+	-- ?	-- ?	0	+	+	+	-	--	0	?	-

SPRINGBANK

SA Summary Table																	
Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP034: Arle Nursery and allotments, Old Gloucester Rd	++	++	++	+	- ?	+	+	-- ?	-- ?	-	-	+	-	--	-	?	-
CP035: Land at Old Gloucester Rd	++	++	+	+	- ?	-	+	-- ?	-- ?	-	0	+	-	--	-	?	-
CP036: Land at Fiddler's Green, Fidler's Green Lane	++	++	++	-	- ?	+	+	-- ?	-- ?	-	0	+	-	+	0	?	-
CP052: Springbank Shopping Centre	+	+	++	+	+	+	+	- ?	- ?	-	+	+	+	+	0	?	++
CP053: Land adjacent to former Goat and Bicycle Public House	+	+	+	+	+	+	--	- ?	- ?	0	+	+	++	+	0	?	++
St MARKS																	
CP054: Land and buildings at Coronation Square	++	+	++	+	+	+	--	-- ?	-- ?	-	+	+	+	+	0	?	++
CP055: Community Centre & Scout Hut, Brooklyn Rd	+	+	+	+	+	+	--	- ?	- ?	-	+	+	+	+	0	?	+
CP056: Rowanfield Exchange, Devon Avenue	++	+	++	+	-	+	--	0 ?	0 ?	-	+	+	+	+	0	?	+
CP086: Former Monkscroft Primary School	+	++	++	+	+	+	+	-- ?	-- ?	-	+	+	-	+	0	?	+
CP087: Land at Stone Crescent	+	0	+	+	-	+	--	0 ?	0 ?	0	+	+	-	+	0	?	-
St PAULS																	
CP083: Henrietta St Car Park, St Margarets Rd	+	+	++	+	+	+	+	0 ?	0 ?	-	+	+	+	+	0	?	++
CP084: 47 - 51 Swindon Rd	+	+	++	+	+	+	+	0 ?	0 ?	-	+	+	+	+	0	?	++
CP091: Hardwick Site, St Pauls Rd	++ ?	++ ?	++	+	+	+	++	- ?	- ?	-	+	+	+	+	0	?	+
CP101: North Place and Portland St	++	++	++	+	+	+	+	- ?	- ?	-	+	+	+	+	+	?	++
St PETERS																	

SA Summary Table																		
Site Option	SA Objective																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
CP057: Christ College Site B	++	++	++	+	- ?	+	--	- ?	- ?	-	+	+	+	-	+	0	?	-
CP058: Outer West, Land at Tewkesbury Rd	0	++	++	+	+	+	++	- ?	- ?	-	-	+	+	++	+	+	?	++
CP060: Cheltenham Spa Railway Station	++	++	++	+	-	- ?	++	++	-- ?	-- ?	0	+	-	+	+	+	0	?
CP080: Land adjoining Great Western Rd	+ ?	+ ?	++	+	+	+	++	0 ?	0 ?	-	--	+ ?	+	+	-	-	?	++
SWINDON VILLAGE																		
CP001: Land at Hyde Lane, Hyde Lane	++	0	+	+	- ?	+	+	- ?	- ?	0	+	+	+	-	--	0	?	-
CP002: Land at Hyde Farm (west section)	++	++	+	+	-- ?	+	+	- ?	- ?	0	0	+	+	-	--	0	?	-
CP003: Land off Brockhampton Lane	++	0	+	+	-	+	+	0 ?	0 ?	0	+	+	+	--	+	0	?	-
CP004: Land at Hunting Butts (west)	++	0	++	+	-- ?	+	+	-- ?	-- ?	0	+	+	+	-	--	0	?	-
CP005: Land at Hunting Butts (south), Swindon Lane	++	++	++	+	- ?	+	+	-- ?	-- ?	0	+	+	+	-	--	0	?	-
CP006: Land at Hunting Butts (central) west of railway cutting	++	++	+	+	-- ?	+	+	-- ?	-- ?	0	+	+	+	-	--	0	?	-
CP007: Land at Hyde Farm (east section)	++	++	+	+	-- ?	+	+	-- ?	-- ?	0	0	+	+	-	--	0	?	-
CP008: Blooms Garden Centre, Evesham Rd	0	++	--	+	-- ?	-	+	-- ?	-- ?	0	--	+	+	-	--	0	?	++
CP059: The Folley, Gardner's Lane	++	++	++	+	+	+	+	- ?	- ?	0	-	+	+	-	+	0	?	-
CP085: Land adjoining Kynance, Church Rd	+	0	++	+	-	+	+	- ?	0 ?	-	0	-	-	-	+	0	?	-
CP093: Depot	++	++	++	+	-- ?	+	+	- ?	- ?	-	+	+	+	++	+	0	?	++
UP HATHERLEY																		

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SA Summary Table																	
Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP032: Land at Sunnyfield Lane (south), Up Hatherley Way	+	0	--	+	-	+	+	-?	-?	0	+	+	-	--	0	?	-
CP033: Land at Sunnyfield Lane (north), Up Hatherley Way	+	0	+	+	-	+	+	-?	-?	0	+	-?	-	--	0	?	-
ADDITIONAL SITES																	
BATTLEDOWN																	
S117: Land adjacent to Longfield, Charlton Kings	+	+	+	+	--	+	+	0?	0?	0	0	+	--	+	0	?	-
BENHALL & THE REDDINGS																	
S122: Land rear of Nuffield Hospital, Hatherley Lane	++	+	++	+	-	+	++	-?	-?	0	+	+	+	+	0	?	++
CHARLTON KINGS																	
S114: Land adj. to Timbercombe Farm, Little Herberts Rd	+	+	++	+	--	+	+	0?	0?	0	+	+	--	+	0	?	-
S115: Land to rear of 291-297 Cirencester Rd	+	+	++	+	--	+	+	0?	0?	0	+	+	--	+	0	?	-
S121: The Bredons, Harp Hill	++	+	--	-	--	--	+	0?	0?	-	+	+	--	+	0	?	-
CHARLTON PARK																	
S116: The East Gloucestershire Club, Old Bath Rd	++	++	+	+	-	+	+	0?	0?	-	+	+	+	+	0	?	++
COLLEGE																	
S119: Karenza, Naunton Parade	+	0	++	+	+	+	+	0?	0	-	+	+	+	+	0	?	+
OAKLEY																	
S113: Premiere Products, Bouncers Lane	++	++	++	+	-?	+	+	-?	-?	-	+	+	+	+	+	?	++
PITTVILLE																	
S123: 100-102 Prestbury Rd	++	+	--	+	--	+	+	0?	0?	-	0	+	+	+	0	?	++
PRESTBURY																	

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SA Summary Table																			
Site Option	SA Objective																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14					
S124: Park Corner & Land to West of Park Corner, Bowbridge Lane	+	++	--	+	-	+	+	0?	0?	0	+	+	+	-	--	0?	?	-	
S125: Land North West of Racecourse	++	0	+	+	--?	+	+	--?	--?	0	0	+	+	-	--	0	?	+	-
S126: Land South West of Racecourse	++	0	++	-	--?	+	+	--?	--?	0	+	+	+	-	--	0	?	+	-
EMPLOYMENT SITE OPTIONS																			
E1: Land south of Jessop Avenue, Town Centre	0	+	++	+	++	+	++	0	0	-	--	+	+	+	0?	?	++		
E2: Land south of Hatherley Lane, The Reddings	0	+	+	+	+	+	++	-?	-?	0	+	+	+	+	0	?	++		
E3: Land north-west of Grovefield Way, The Reddings	0	++	+	-	+	--	++	--?	--?	0	+	+	+	-	--	0	?	-	
NEW SITES: OCTOBER 2017																			
Land off Oakhurst Rise	++	0	+	+	+	+	+	-	0	0	+	+	+	-	+	-	?	-	
Lansdown Industrial Estate	++	0?	++	+	+	++	+	-?	-	-	0	+	+	+	0	?	+		
Leckhampton	++	0	+	+	+	+	+	-	-	0	+	+	+	0	+	0	?	-	

Cheltenham Borough Local Plan Housing and Employment Site Options

All Saints

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP071: Bences Timber Yard, St Johns Ave.	+	+	++	+	+	+	+	0?	0?	-	+	+	+	+	0	?	++

Summary:

The Council Sites Assessment has identified that site CP071 has the capacity to accommodate 20 new dwellings in the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.47 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of existing public open space, including Robert Harvey House and Belmont Road Flats Amenity Greenspace. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. It is also located within 800m of most of the services and facilities identified within the Council's accessibility assessment¹. Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to secondary and higher education, a children centre and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections at this site could significantly enhance the identified positive effects.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until lower level assessments have been completed.

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; with the potential for a minor positive effect against SA Objective 9.

¹ Gloucestershire County Council

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity², and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use as a timber yard, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site was not assessed in the GCT JCS Landscape Sensitivity Study³, and it is not located within or adjacent to the AONB. The site is brownfield land in the urban area, currently used as a timber yard. It is considered therefore that there is the potential for a minor long-term positive effect on townscape (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located within the Central Conservation Area, and lies adjacent to a Listed Building. Mitigation provided through the GCT JCS, and available at the project level, should ensure sensitive and responsive design that respects the historic townscape, and that development does not significantly affect designated heritage assets or their settings. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. It is considered therefore that taking mitigation into account there is the potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP072: Sherborne Place Car Park	+	+	++	+	+	+	+	0?	0?	-	+	+	+	+	0	?	++

Summary:

The Council Sites Assessment has identified that site CP072 has the capacity to accommodate 11 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.25 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Sandford Park. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. It is also located within 800m of most of the services and facilities identified within the Council's accessibility

² JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

³ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

assessment⁴. Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to secondary and higher education, a children centre and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections at this site could significantly enhance the identified positive effects.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until lower level assessments have been completed.

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity⁵, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use as a car park, it is considered that there are potential opportunities to enhance biodiversity on site. As such there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site was not assessed in the GCT JCS Landscape Sensitivity Study⁶, and it is not located within or adjacent to the AONB. The site is brownfield land in the urban area, currently used as a car park. It is considered therefore that there is the potential for a minor long-term positive effect on townscape (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located within the Central Conservation Area, and lies adjacent to a Listed Buildings. Mitigation provided through the GCT JCS, and available at the project level, should ensure sensitive and responsive design that respects the historic townscape, and that development does not

⁴ Gloucestershire County Council

⁵ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

⁶ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

significantly affect designated heritage assets or their settings. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. It is considered therefore that taking mitigation into account there is the potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP073: Axiom, Winchcombe St	++	+	++	+	+	+	+	- ?	- ?	-	+	+ ?	++	+	+	?	++

Summary:

The Council Sites Assessment has identified that site CP073 has the capacity to accommodate 7 new dwellings within the early stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 0.07 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of existing public open space, including Robert Harvey House, Belmont Road Flats Amenity Greenspace and Fairview OS. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. It is also located within 800m of most of the services and facilities identified within the Council's accessibility assessment⁷. Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to secondary and higher education, a children centre and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections at this site could significantly enhance the identified positive effects.

Highways Development Management comments⁸ identify that there are access issues at this site. Development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects. However given the potential access issues it is considered that there is the potential for a residual minor negative effect against SA Objectives 6 and 7, with an element of uncertainty until lower level assessments have been completed.

⁷ Gloucestershire County Council

⁸ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site however is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity⁹, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. It is considered that there are potential opportunities to enhance biodiversity on site, and as such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site was not assessed in the GCT JCS Landscape Sensitivity Study¹⁰, and it is not located within or adjacent to the AONB. The site is brownfield land in the urban area, containing a derelict Community Arts and Music Venue. Given the derelict nature of the site, it is considered therefore that there is the potential for a major long-term positive effect on townscape (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located within the Central Conservation Area, and the Axiom Building is a local non-designated heritage asset. Mitigation provided through the GCT JCS, and available at the project level, should ensure sensitive and responsive design that respects the historic townscape. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Development has the potential to bring the derelict building back into use and thus secure ongoing management and maintenance. As such, it is considered that there is the potential for a minor long-term positive effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP095: St James's St Car Park	+	+	++	+	+	+	+	- ?	0 ?	-	+	+ ?	+	+	0	?	++
Summary:																	

⁹ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

¹⁰ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-ics.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The Council Sites Assessment has identified that site CP095 has the capacity to accommodate 17 new dwellings in the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.51 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of existing public open space, including Sandford Park, and Oxford and Priory Gardens. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. It is also located within 800m of most of the services and facilities identified within the Council's accessibility assessment¹¹. Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to secondary education, a children centre and/or A&E could enhance the significance of the positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections at this site could significantly enhance the identified positive effects.

Development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Development Management comments¹² further identify that the loss of parking on site may need consideration. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 7, with an element of uncertainty until lower level assessments have been completed, however given that the site has poor access, it is considered that there is still the potential for a minor negative effect against SA Objective 6 with an element of uncertainty until lower level assessments have been completed.

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of a Deciduous Woodland Priority Habitat. Brownfield land is considered to have the potential to support a large amount of biodiversity¹³, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use as a car park, it is considered that there are potential opportunities to enhance biodiversity on site, which could further support the existing priority habitats. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

¹¹ Gloucestershire County Council

¹² Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

¹³ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

This site was not assessed in the GCT JCS Landscape Sensitivity Study¹⁴, and it is not located within or adjacent to the AONB. The site is brownfield land in the urban area, currently used as a car park. It is considered therefore that there is the potential for a minor long-term positive effect on townscape (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located within the Central Conservation Area, and lies adjacent to a Listed Building. Mitigation provided through the GCT JCS, and available at the project level, should ensure sensitive and responsive design that respects the historic townscape, and that development does not significantly affect designated heritage assets or their settings. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. It is considered therefore that, after mitigation, there is the potential for a residual neutral effect against SA Objective 12.

¹⁴ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-ics.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

Battledown

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP024: Castle Dream Stud, Mill Lane	+	0	--	-	--	--	+	0?	0?	0	+	+	?	+	0	?	-

Summary:

The Council Sites Assessment has identified that site CP024 has the capacity to accommodate 1 new dwelling in the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1.

The site is surrounded by compatible land uses, however it is not located within 300m of existing public open space. As such, it is considered that there is the potential for a minor negative effect against SA Objective 3. Given the size of the site it is also unlikely that new open space could be provided with development to mitigate the identified negative effect. The site is not located within 800m of an existing employment area with the potential for a major negative effect against SA Objective 2b. The site is also located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment¹⁵, and development may increase reliance on the private vehicle. Potential for a major negative effect against SA Objective 4. Given the capacity of the site, development is unlikely to deliver any significant improvements to provisions in this area.

The site is not located within a reasonable walking distance (800m) of either a bus stop or train station. Development at this site could increase reliance on the private vehicle with the potential for a major negative effect against SA Objective 5a. The site is however located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could also improve accessibility at this site.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until lower level assessments have been completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of Deciduous Woodland, and Wood-pasture and Parkland Priority Habitats. The Cheltenham Local Plan can support habitat enhancement on site through appropriate policy wording, and there is the opportunity to provide linkages with the existing priority habitats south east of the site. As such, it is considered that there is the

¹⁵ Gloucestershire County Council

potential for a minor positive effect against SA Objective 10 with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study¹⁶, however it is located wholly within the AONB. The site is greenfield land in a rural setting. It is considered that there is the potential for a major long-term negative effect on landscapes (SA Objective 11a) through development in a sensitive landscape area and previously undeveloped area. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site lies in close proximity to the Glenfall House Registered Park and Garden; however given the capacity of the site to accommodate 1 dwelling, and mitigation provided through the GCT JCS, it is considered unlikely that development will lead to any significant negative effects. Potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
CP025: Land at Mill Lane	+	0	--	-	--	--	+	0?	0?	0	+	+	?	--	+	0	?	+

Summary:

The Council Sites Assessment has identified that site CP025 has the capacity to accommodate 8 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1.

The site is surrounded by compatible land uses, however it is not located within 300m of existing public open space. As such, it is considered that there is the potential for a minor negative effect against SA Objective 3. Given the size of the site it is also unlikely that new open space could be provided with development to mitigate the identified negative effect. The site is not located within 800m of an existing employment area with the potential for a major negative effect against SA Objective 2b. It is also located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment¹⁷, and development may increase reliance on the private vehicle. Potential for a major negative effect against SA Objective 4. Given the capacity of the site, development is unlikely to deliver any significant improvements to provisions in this area.

The site is not located within a reasonable walking distance (800m) of either a bus stop or train station. Development at this site could increase reliance on the private vehicle with the potential for a major negative effect against SA Objective 5a. The site is however located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could improve accessibility at this site.

¹⁶ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

¹⁷ Gloucestershire County Council

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until lower level assessments have been completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of a Deciduous Woodland Priority Habitat. The Cheltenham Local Plan can support habitat enhancement on site through appropriate policy wording, and there is the opportunity to provide linkages with the existing priority habitats south east of the site, particularly in combination with development at site option CP024. As such, it is considered that there is the potential for a minor positive effect against SA Objective 10 with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study¹⁸, however it is located wholly within the AONB. The site is greenfield land in a rural setting. It is considered that there is the potential for a major long-term negative effect on landscapes (SA Objective 11a) through development in a sensitive landscape area and previously undeveloped area. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site lies in close proximity to Glenfall House Registered Park and Garden, in a rural area with little built development surrounding it. Development is considered to have the potential to alter the setting of designated heritage assets. However, given the capacity of the site, and mitigation provided through the GCT JCS, it is considered unlikely that development will lead to any significant effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that appropriate site level assessments are carried out prior to development. Taking mitigation into account therefore, it is considered that there is the potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
CP026: Land north of Greenway Lane	+	0	--	+	--	+	+	0?	0?	0	+	+	?	--	+	0	?	-
Summary:																		

¹⁸ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-ics.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The Council Sites Assessment has identified that site CP026 has the capacity to accommodate 40 new dwellings in the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1.

The site is surrounded by compatible land uses, and is located within 300m of Ryeworth Cricket Club. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is not located within 800m of an existing employment area with the potential for a major negative effect against SA Objective 2b. The site is also located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment¹⁹, and development may increase reliance on the private vehicle. Potential for a major negative effect against SA Objective 4. Given the capacity of the site, development is unlikely to deliver any significant improvements to provisions in this area.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections at this site could significantly enhance the identified positive effects.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until lower level assessments have been completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located adjacent to a Deciduous Woodland Priority Habitat. The Cheltenham Local Plan can, through appropriate policy wording; support habitat enhancement on site, and support opportunities to provide linkages with the adjacent priority habitat. As such, it is considered that there is the potential for a minor positive effect against SA Objective 10 with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study²⁰, however it is located wholly within the AONB. The site is predominantly greenfield land adjacent to low density housing. It is considered that there is the potential for a major long-term negative effect on landscapes (SA Objective 11a) through development in a sensitive landscape area and previously undeveloped area. The Cheltenham Local Plan, through appropriate policy wording, should ensure that development retains the existing mature trees on site. As the site is predominantly greenfield land it is

¹⁹ Gloucestershire County Council

²⁰ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-ics.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets, however the Battledown Camp Scheduled Monument is located less than 500m north of the site. Given the capacity of the site, and mitigation provided through the GCT JCS, development is not considered likely to lead to any significant effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that appropriate site level assessments are carried out prior to development. Taking mitigation into account it is considered that there is the potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP027: Land south of Greenway Lane	+	0	--	+	--	+	+	0?	0?	-	+	-	--	+	0	?	-

Summary:

The Council Sites Assessment has identified that site CP027 has the capacity to accommodate 30 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1.

The site is surrounded by compatible land uses, and is located within 300m of Ryeworth Cricket Club. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is not located within 800m of an existing employment area with the potential for a major negative effect against SA Objective 2b. The site is also located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment²¹, and development may increase reliance on the private vehicle. Potential for a major negative effect against SA Objective 4. Given the capacity of the site, development is unlikely to deliver any significant improvements to provisions in this area.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections at this site could significantly enhance the identified positive effects.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until lower level assessments have been completed.

²¹ Gloucestershire County Council

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The majority of the site is a BAP Priority Habitat of Deciduous Woodland, which extends beyond the site past Greenway Lane. The site is also located within 200m of a non-statutory nature reserve in Ryeworth. The Cheltenham Local Plan, through appropriate policy wording can; support the enhancement of the habitats, and strengthen GI corridors between the woodland habitat and the non-statutory nature reserve. However, development at the site is likely to result in the loss of areas of Priority Habitat, and as such is considered to have the potential for a minor long-term negative effect against SA Objective 10.

The site was not assessed in the GCT JCS Landscape Sensitivity Study²², however it is located wholly within the AONB. The site is greenfield land and contains mature trees and hedgerows. It is considered that there is the potential for a major long-term negative effect on landscapes (SA Objective 11a) through development in a sensitive landscape area and previously undeveloped area. The Cheltenham Local Plan, through appropriate policy wording, should ensure that development retains the existing mature trees on site. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets, however the Battledown Camp Scheduled Monument is located less than 600m north of the site. Given the capacity of the site, and mitigation provided through the GCT JCS, development is not considered likely to lead to any significant effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that appropriate site level assessments are carried out prior to development. Taking mitigation into account it is considered that there is the potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP028: Land adjacent to Orchard Cottages	+	0	--	-	-	+	+	- ?	0 ?	0	+	+ ?	--	+	0	?	-

Summary:

The Council Sites Assessment has identified that site CP028 has the capacity to accommodate 10 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1.

The site is surrounded by compatible land uses, however it is not located within 300m of existing public open space. As such, it is considered that there is the potential for a minor negative effect against SA Objective 3. Given the size of the site it is also unlikely that new open space could be provided

²² GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-ics.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

with development to mitigate the identified negative effect. The site is not located within 800m of an existing employment area with the potential for a major negative effect against SA Objective 2b. The site is located within 800m of some of the services and facilities identified within the Council's accessibility assessment²³, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this is considered unlikely. Potential for a residual minor negative effect against SA Objective 4.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections at this site could significantly enhance the identified positive effects.

Development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 7, with an element of uncertainty until lower level assessments have been completed, however given the site has poor access it is considered that there is still the potential for a minor negative effect against SA Objective 6 with an element of uncertainty until site level assessments arise.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of Deciduous Woodland Priority Habitat in the north west and south of the site. The Cheltenham Local Plan can, through appropriate policy wording; support habitat enhancement on site, and support opportunities to create linkages between the two woodland habitats. As such, it is considered that there is the potential for a minor positive effect against SA Objective 10 with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study²⁴, however it is located wholly within the AONB. The site is greenfield land and contains trees. It is considered that there is the potential for a major long-term negative effect on landscapes (SA Objective 11a) through development in a sensitive landscape area and previously undeveloped area. Any development proposals for the site should seek to retain the existing trees. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

²³ Gloucestershire County Council

²⁴ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-ics.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
CP029: Land south of Glenfall Way	+	0	--	+	-	+	+	0?	0?	-	+	+	?	--	+	0	?	-

Summary:

The Council Sites Assessment has identified that site CP029 has the capacity to accommodate 15 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1.

The site is surrounded by compatible land uses, and is located within 300m of existing public open space, including Lawrence Close Green Space and Hartlebury Way Open Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is not located within 800m of an existing employment area with the potential for a major negative effect against SA Objective 2b. The site is located within 800m of some of the services and facilities identified within the Council's accessibility assessment²⁵, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this is considered unlikely. Potential for a residual minor negative effect against SA Objective 4.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections at this site could significantly enhance the identified positive effects.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until lower level assessments have been completed.

The site partially overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site contains a small area of Deciduous Woodland Priority Habitat that extends east of the site. The Cheltenham Local Plan can, through appropriate policy wording; ensure that development retains the existing Priority Habitat on site, and support habitat enhancement on site. As such, it

²⁵ Gloucestershire County Council

is considered that there is the potential for a minor positive effect against SA Objective 10 with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study²⁶, however it is located wholly within the AONB. The site is greenfield land and contains trees. It is considered that there is the potential for a major long-term negative effect on landscapes (SA Objective 11a) through development in a sensitive landscape area and previously undeveloped area. The Cheltenham Local Plan, through appropriate policy wording, should ensure that development retains the existing mature trees on site. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP064: King Alfred Way 1 & 2	++	++	++	+	- ?	+	+	- ?	- ?	0	+	+	++	+	0	?	+

Summary:

The Council Sites Assessment has identified that site CP064 has the capacity to accommodate 86 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 1.71 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The northern section of the site is a previous landfill site and as such decontamination and remediation measures may be required prior to development to ensure that there are no negative effects on health. The Cheltenham Local Plan can, through appropriate policy wording, ensure that appropriate site level assessments are carried out prior to development, and that appropriate remediation measures are undertaken if necessary. If the appropriate policy mitigation is put into place, it is considered that there is the potential for a residual neutral effect. The site is located within 300m of Queen Elizabeth II Public Green Space. As such, it is considered that after mitigation, there is the potential for a minor positive effect against SA Objective 3.

The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is located within 800m of some of the services and facilities identified within the Council's accessibility assessment²⁷, however unless development

²⁶ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

²⁷ Gloucestershire County Council

provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this may be possible. Potential for a residual minor negative effect against SA Objective 4 with an element of uncertainty until project level details arise.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections at this site could significantly enhance the identified positive effects.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Although mitigation is provided through the GCT JCS and Cheltenham Local Plan, given the higher capacity of the site, it is considered that there is the potential for residual minor negative effects against SA Objectives 6 and 7, with an element of uncertainty until site level assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity²⁸, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. It is considered that there are potential opportunities to enhance biodiversity on site, and as such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study²⁹, and it is not located within or adjacent to the AONB. The whole site is brownfield land containing a mix of occupied and vacant buildings in an established industrial site. It is considered that there is the potential for a major positive effect on landscapes (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located adjacent to the Central Conservation Area. Mitigation provided through the GCT JCS should ensure sensitive and responsive design that respects the historic townscape, and that development does not lead to any significant negative effects. The Cheltenham Local Plan can,

²⁸ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

²⁹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-ics.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP065: St Edwards Car Park, London Rd	+	+	++	+	-	+	+	0?	0?	-	+	+	+	+	0	?	++

Summary:

The Council Sites Assessment has identified that site CP065 has the capacity to accommodate 6 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.14 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Whitefriars Car Park Amenity Green Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is located within 800m of some of the services and facilities identified within the Council's accessibility assessment³⁰, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this is considered unlikely. Potential for a residual minor negative effect against SA Objective 4.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections at this site could significantly enhance the identified positive effects.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Development Management comments³¹ further identify that the loss of parking on site may need consideration. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, and available at the project level, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The site partially overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

³⁰ Gloucestershire County Council

³¹ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

The site does not contain any designated (or non-designated) biodiversity, however it is located adjacent to a Deciduous Woodland Priority Habitat. Brownfield land is considered to have the potential to support a large amount of biodiversity³², and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the current use of the site as a car park, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study³³, and it is not located within or adjacent to the AONB. The site is brownfield land currently used as car parking supporting the local neighbourhood centre. It is considered that there is the potential for a minor long-term positive effect on landscapes (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The boundary walls and gate piers to St Edwards Middle School form part of the existing access to the site, and are Grade II Listed. However, given the capacity of the site, and mitigation provided through the GCT JCS, development is not considered likely to lead to any significant effects. Taking mitigation into account therefore, it is considered that there is the potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
CP100: Battledown	++ ?	++ ?	+	+	-- ?	+	+	- ?	- ?	0	+	+	+	--	+	-	?	?

Summary:

The site is assessed as not suitable, available or achievable within the SALA, however the Council Sites Assessment has identified that site CP100 has the capacity to accommodate 277 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 14.68 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a. At this stage however to reflect the findings of the SALA there is an element of uncertainty.

The site is surrounded by compatible land uses, and is located within 300m of Priors Farm Public Green Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. It should be noted however that Priors Farm Public Green Space is also being considered for development as part of site option CP023.

³² JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

³³ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-ics.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The site is located within 800m of an existing employment area with the potential for a minor positive effect against SA Objective 2b. The site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment³⁴ however, and development may increase reliance on the private vehicle. Potential for a major negative effect against SA Objective 4. Given the capacity of the site there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections at this site could significantly enhance the identified positive effects.

There is uncertainty regarding access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Although mitigation is provided through the GCT JCS and Cheltenham Local Plan, given the higher capacity of the site, it is considered that there is the potential for residual minor negative effects against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within a area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site contains an area of Deciduous Woodland Priority Habitat. The Cheltenham Local Plan can, through appropriate policy wording; ensure that development retains the existing Priority Habitat on site, support habitat enhancement on site, and support the creation of GI linkages with further woodland habitats to the south east of the site. As such, it is considered that there is the potential for a minor positive effect against SA Objective 10 with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study³⁵, however it is located wholly within the AONB. The site is predominantly greenfield land adjacent to the urban area. It is considered that there is the potential for a major long-term negative effect on landscapes (SA Objective 11a) through development in a sensitive landscape area and previously undeveloped area. As the site is contains areas of greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located adjacent to Hewlett's Reservoir, which, along with the pavilion, boundary walls and gate piers are all Listed. The site is also located within 200m of the Battledown Camp Scheduled Monument, and within 500m of Glenfall House Registered Park and Garden. Mitigation provided

³⁴ Gloucestershire County Council

³⁵ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-ics.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

through the GCT JCS should ensure that development would not lead to any significant negative effects, however given the capacity of the site, there is the potential to alter the setting of designated heritage assets. As such, it is considered that there is the potential for a residual minor long-term negative effect against SA Objective 12.

Benhall and The Reddings

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP043: Land at The Reddings, north of Branch Rd	++	++	++	+	-- ?	-	++	-- ?	-- ?	0	+	+	-	--	0	?	-

Summary:

The Council Sites Assessment has identified that site CP043 has the capacity to accommodate 202 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 8 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of existing public open space, including Chalford Avenue, Barrington Avenue and Springfield Close Open Spaces and The Chase Amenity Green Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment³⁶, and development may increase reliance on the private vehicle. Potential for a major negative effect against SA Objective 4. Given the capacity of the site there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.

The site is located within 800m of a bus stop and given this distance, development at the site is considered less likely to contribute to a reduced reliance on the private vehicle with the potential for a minor negative effect against SA Objective 5a. The site is located however within 400m of both PRoWs and a Sustrans National Cycle Route, and as such development has opportunities to promote these modes of transport with the potential for a major long-term positive effect against SA Objective 5b.

There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the M5 and A40). Development is likely to exacerbate air quality issues in this area also. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site contains a BAP Priority Habitat of Traditional Orchards along its northern border. The Cheltenham Local Plan can, through appropriate policy wording; ensure that development retains the existing Priority Habitat on site, and support habitat enhancement on site. As such, it is considered that

³⁶ Gloucestershire County Council

there is the potential for a minor positive effect against SA Objective 10 with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study³⁷ as of medium-low landscape sensitivity. The site is entirely greenfield land and contains trees. It is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. Any development proposal for the site should seek to retain the existing trees. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP044: Land at The Reddings, south of Branch Rd	++ ?	++ ?	+	+	-- ?	--	++	-- ?	-- ?	0	+	+ ?	-	--	0	?	

Summary:

The site is assessed as not suitable, available or achievable within the SALA, however the Council Sites Assessment has identified that site CP044 has the capacity to accommodate 168 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 6.66 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a. At this stage however to reflect the findings of the SALA there is an element of uncertainty.

The site is surrounded by compatible land uses, and is located within 300m of existing public open space, including Chalford Avenue, Barrington Avenue and Springfield Close Open Spaces and The Chase Amenity Green Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 800m of an existing employment area with the potential for a minor positive effect against SA Objective 2b. The site is however located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment³⁸, and development may increase reliance on the private vehicle in this respect. Potential for a major negative effect against SA Objective 4. Given the capacity of the site there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.

³⁷ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

³⁸ Gloucestershire County Council

The site is not located within a reasonable walking distance (800m) of either a bus stop or train station. Development at this site could increase reliance on the private vehicle with the potential for a major negative effect against SA Objective 5a. The site is located however within 400m of both PRoWs and a Sustrans National Cycle Route, and as such development has opportunities to promote these modes of transport with the potential for a major long-term positive effect against SA Objective 5b.

There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the M5). Development is likely to exacerbate air quality issues in this area also. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

In the centre of the site there is a BAP Priority Habitat of Traditional Orchards which extends to its northern border. The Cheltenham Local Plan can, through appropriate policy wording; ensure that development retains the existing Priority Habitat on site, and support habitat enhancement on site. As such, it is considered that there is the potential for a minor positive effect against SA Objective 10 with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study³⁹ as of medium-low landscape sensitivity. The site is entirely greenfield land and contains trees. It is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. Any development proposal for the site should seek to retain the existing trees. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site lies adjacent to Manor House; a local non-designated heritage asset. Mitigation provided through the GCT JCS should ensure that development will not lead to any significant effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Taking into account the available and potential mitigation and capacity of the site, it is considered that there is the potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14

³⁹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-ics.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

CP045: Land at the Hayloft (west), The Reddings/Badgeworth Rd	++	++	--	--	-- ?	--	+	-- ?	-- ?	0	+	+ ?	-	--	0	?	-
<p>Summary: The Council Sites Assessment has identified that site CP045 has the capacity to accommodate 58 new dwellings in the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 1.76 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.</p> <p>The site is located adjacent to a railway line, and mitigation will be required to reduce the associated negative effects on health, including noise pollution. The site is also not located within 300m of existing public open space. As such, it is considered that there is the potential for a major negative effect against SA Objective 3. The site is not located within 800m of an existing employment area with the potential for a major negative effect against SA Objective 2b. However, this should be considered alongside the provision of employment on site, which can mitigate the negative effects to some degree. The site is also located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment⁴⁰, and development may increase reliance on the private vehicle. Potential for a major negative effect against SA Objective 4. Given the capacity of the site there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.</p> <p>The site is not located within a reasonable walking distance (800m) of either a bus stop or train station. Development at this site could increase reliance on the private vehicle with the potential for a major negative effect against SA Objective 5a. The site is however located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could improve accessibility at the site.</p> <p>There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the M5). Development is likely to exacerbate air quality issues in this area also. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.</p> <p>The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.</p> <p>The site does not contain any designated (or non-designated) biodiversity, however it is located adjacent to a Deciduous Woodland Priority Habitat. The Cheltenham Local Plan can, through appropriate policy wording; support habitat enhancement on site, and support opportunities to create GI linkages with the woodland habitat. As such, it is considered that there is the potential for a minor positive effect against SA Objective 10 with an element of uncertainty until policy mitigation and site level assessments have been completed.</p>																	

⁴⁰ Gloucestershire County Council

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study⁴¹ as of medium-low landscape sensitivity. The site is greenfield and garden land and contains trees. It is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. Any development proposal for the site should seek to retain the existing trees. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site lies adjacent to Manor House; a local non-designated heritage asset. Mitigation provided through the GCT JCS should ensure that development will not lead to any significant effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Taking into account the available and potential mitigation, and capacity of the site, it is considered that there is the potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP046: Land at the Hayloft (east), south of The Reddings	++	++	+	--	-- ?	--	+	-- ?	-- ?	0	+	+ ?	-	--	0	?	-

Summary:

The Council Sites Assessment has identified that site CP046 has the capacity to accommodate 55 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 1.66 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is located adjacent to a railway line, and mitigation will be required to reduce the associated negative effects on health, including noise pollution. The site is also not located within 300m of existing public open space. As such, it is considered that there is the potential for a major negative effect against SA Objective 3. The site is located within 800m of an existing employment area with the potential for a minor positive effect against SA Objective 2b. The site is however located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment⁴², and development may increase reliance on the private vehicle. Potential for a major negative effect against SA Objective 4. Given the capacity of the site there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.

The site is not located within a reasonable walking distance (800m) of either a bus stop or train station. Development at this site could increase reliance on the private vehicle with the potential for a major negative effect against SA Objective 5a. The site is however located within 400m of a

⁴¹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

⁴² Gloucestershire County Council

PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could improve accessibility at this site.

The site has poor access, and development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the M5). Development is likely to exacerbate air quality issues in this area also. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The western end of the site contains a BAP Priority Habitat of Deciduous Woodland. The Cheltenham Local Plan can, through appropriate policy wording; ensure that development retains the existing Priority Habitat on site, and support habitat enhancement on site. As such, it is considered that there is the potential for a minor positive effect against SA Objective 10 with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study⁴³ as of medium-low landscape sensitivity. The site is greenfield and garden land and contains trees. It is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. Any development proposal for the site should seek to retain the existing trees. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
CP047: Flowerdale Farm, The Reddings	+	++	+	+	--	-	+	-- ?	-- ?	0	+	+	+	-	--	0	?	-
Summary:																		

⁴³ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-ics.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The Council Sites Assessment has identified that site CP047 has the capacity to accommodate 49 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 1.47 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is located adjacent to a railway line, and mitigation will be required to reduce the associated negative effects on health, including noise pollution. Mitigation provided through the GCT JCS, and available at the project level, should ensure that there will be no significant negative effects. The site is located within 300m of public open space, including Chalford Avenue, Barrington Avenue and Springfield Close Open Spaces and The Chase Amenity Green Space. As such, it is considered that there is the potential after mitigation, for a minor positive effect against SA Objective 3.

The site is located within 800m of an existing employment area with the potential for a minor positive effect against SA Objective 2b. The site is however located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment⁴⁴, and development may increase reliance on the private vehicle. Potential for a major negative effect against SA Objective 4. Given the capacity of the site, development is unlikely to deliver any significant improvements to provisions in this area.

The site is located within 800m of a bus stop and given this distance, development at the site is considered less likely to contribute to a reduced reliance on the private vehicle with the potential for a minor negative effect against SA Objective 5a. The site is located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could improve accessibility at this site

The site has poor access, and development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the M5). Development is likely to exacerbate air quality issues in this area also. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. The Cheltenham Local Plan can support the enhancement of features, through appropriate policy wording. It is considered that there are potential opportunities to enhance biodiversity on site, and as such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

⁴⁴ Gloucestershire County Council

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study⁴⁵ as of medium-low landscape sensitivity. The site is predominantly greenfield and garden land and contains trees. It is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. Any development proposal for the site should seek to retain the existing trees. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP048: Land at Stansby Mobile Home & Caravan Pk, The Reddings	++	++	+	+	-- ?	-	++	-- ?	-- ?	0	+	+	+	--	0	?	+

Summary:

The Council Sites Assessment has identified that site CP048 has the capacity to accommodate 59 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 1.78 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is located adjacent to a railway line, as such mitigation will be required to reduce the associated negative effects on health, including noise pollution. Mitigation provided through the GCT JCS, and available at the project level, should ensure that there will be no significant negative effect. The Cheltenham Local Plan can, through appropriate policy wording, ensure that appropriate site level assessments, and remediation measures if necessary, are carried out prior to development. The site is located within 300m of public open space, including Chalford Avenue, Barrington Avenue and Springfield Close Open Spaces and The Chase Amenity Green Space. As such, it is considered that there is the potential after mitigation, for a minor positive effect against SA Objective 3.

The site is located within 800m of an existing employment area with the potential for a minor positive effect against SA Objective 2b. The site is however located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment⁴⁶, and development may increase reliance on the private vehicle. Potential for a major negative effect against SA Objective 4. Given the capacity of the site there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.

⁴⁵ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

⁴⁶ Gloucestershire County Council

The site is located within 800m of a bus stop and given this distance, development at the site is considered less likely to contribute to a reduced reliance on the private vehicle with the potential for a minor negative effect against SA Objective 5a. The site is however located within 400m of both PRoWs and a Sustrans National Cycle Route, and as such development has opportunities to promote these modes of transport with the potential for a major long-term positive effect against SA Objective 5b.

There is poor access to the site⁴⁷, and development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the M5). Development is likely to exacerbate air quality issues in this area also. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity⁴⁸, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. It is considered that there are potential opportunities to enhance biodiversity on site, and as such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study⁴⁹ as of medium-low landscape sensitivity. The site is predominantly brownfield land, currently used as a caravan park. It is considered that there is the potential for a minor long-term positive effect on landscapes (SA Objective 11a) through the regeneration of this land. Any development proposal for the site should also seek to retain the existing trees. As the site is predominantly brownfield land it is also considered to have the potential for a minor positive effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

⁴⁷ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/CheltplanO2015/listRespondents>

⁴⁸ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

⁴⁹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-ics.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP049: Land west of Grovefield Way, The Reddings	+	+	++	+	-	-	++	- ?	- ?	0	+	+ ?	-	--	0	?	-

Summary:

The Council Sites Assessment has identified that site CP049 has the capacity to accommodate 27 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.8 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of existing public open space, including Chalford Avenue, Barrington Avenue and Springfield Close Open Spaces and The Chase Amenity Green Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is located within 800m of one of the services and facilities identified within the Council's accessibility assessment⁵⁰, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this is considered unlikely. Potential for a residual minor negative effect against SA Objective 4.

The site is located within 800m of a bus stop and given this distance, development at the site is considered less likely to contribute to a reduced reliance on the private vehicle with the potential for a minor negative effect against SA Objective 5a. The site is however located within 400m of both PRoWs and a Sustrans National Cycle Route, and as such development has opportunities to promote these modes of transport with the potential for major long-term positive effect against SA Objective 5b.

There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the M5 and A40). Development is likely to exacerbate air quality issues in this area also. Highways Development Management comments⁵¹ further identify that visibility to Grovefield Way appears restricted. However, given the lower capacity of the site, and mitigation provided through the GCT JCS and Cheltenham Local Plan, and available at the project level, it is considered that there is the potential for a residual minor negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

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⁵⁰ Gloucestershire County Council

⁵¹ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. The Cheltenham Local Plan can support the enhancement of features, through appropriate policy wording. It is considered that there are potential opportunities to enhance biodiversity on site, and as such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study⁵² as of medium-low landscape sensitivity. The site is entirely greenfield land and as such, it is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective														1		
	1	2	3	4	5	6	7	8	9	10	11	12	13				
CP050: Land off Grovefield Way, The Reddings	+	+	++	+	--	-	++	-?	-?	0	+	+	-	--	0	?	1

Summary:

The Council Sites Assessment has identified that site CP050 has the capacity to accommodate 12 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.34 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of existing public open space, including Chalford Avenue, Barrington Avenue and Springfield Close Open Spaces and The Chase Amenity Green Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. However, the site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment⁵³, and development may increase reliance on the private vehicle in this respect. Potential for a major negative effect against SA Objective 4. Given the capacity of the site, development is unlikely to deliver any significant improvements to provisions in this area.

⁵² GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

⁵³ Gloucestershire County Council

The site is located within 800m of a bus stop and given this distance, development at the site is considered less likely to contribute to a reduced reliance on the private vehicle with the potential for a minor negative effect against SA Objective 5a. The site is also located within 400m of both PRoWs and a Sustrans National Cycle Route, and as such development has opportunities to promote these modes of transport with the potential for a major long-term positive effect against SA Objective 5b.

There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the M5 and A40). Development is likely to exacerbate air quality issues in this area also. Development Management comments⁵⁴ further identify that visibility to Grovefield Way appears restricted. However, given the lower capacity of the site, and mitigation provided through the GCT JCS and Cheltenham Local Plan, it is considered that there is the potential for a residual minor negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. The Cheltenham Local Plan can support the enhancement of features, through appropriate policy wording. It is considered that there are potential opportunities to enhance biodiversity on site, and as such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study⁵⁵ as of medium-low landscape sensitivity. The site is entirely greenfield land and contains trees and hedgerows. It is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. Any development proposal for the site should seek to retain the existing trees and hedgerows where possible. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

⁵⁴ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

⁵⁵ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-ics.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP051: Land r/o Shakespeare Cottages, The Reddings	+	+	++	+	--	-	++	- ?	- ?	0	+	+ ?	-	--	0	?	-

Summary:

The Council Sites Assessment has identified that site CP051 has the capacity to accommodate 9 new dwellings in the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.26 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of existing public open space, including Chalford Avenue, Barrington Avenue and Springfield Close Open Spaces and The Chase Amenity Green Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment⁵⁶, and development may increase reliance on the private vehicle. Potential for a major negative effect against SA Objective 4. Given the capacity of the site, development is unlikely to deliver any significant improvements to provisions in this area.

The site is located within 800m of a bus stop and given this distance, development at the site is considered less likely to contribute to a reduced reliance on the private vehicle with the potential for a minor negative effect against SA Objective 5a. The site is however located within 400m of both PRoWs and a Sustrans National Cycle Route, and as such development has opportunities to promote these modes of transport with the potential for major long-term positive effect against SA Objective 5b.

The site has poor access, and development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the M5 and A40). Development is likely to exacerbate air quality issues in this area also. However, given the low capacity of the site for new development, and mitigation provided through the GCT JCS and Cheltenham Local Plan, it is considered that there is the potential for a residual minor negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. The Cheltenham Local Plan can support the enhancement of features, through appropriate policy wording. It is considered that there are potential

⁵⁶ Gloucestershire County Council

opportunities to enhance biodiversity on site, and as such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study⁵⁷ as of medium-low landscape sensitivity. The site contains areas of previously developed land, however it is predominantly greenfield land and contains trees. It is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a largely undeveloped area. Any development proposal for the site should seek to retain the existing trees. As the site is predominantly greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

⁵⁷ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-ics.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

Charlton Kings

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP030: Land off Timbercombe Lane	+	0	++	+	-	+	+	- ?	0 ?	0	+	-	--	+	0	?	-

Summary:

The Council Sites Assessment has identified that site CP030 has the capacity to accommodate 24 new dwellings in the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1.

The site is surrounded by compatible land uses, and is located within 300m of Little Herberts Green Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is located within 800m of one of the services and facilities identified within the Council's accessibility assessment⁵⁸, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this is considered unlikely. Potential for a residual minor negative effect against SA Objective 4.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance accessibility at this site.

Development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 7, with an element of uncertainty until lower level assessments have been completed, however given that the site has very poor access, it is considered that there is still the potential for a minor negative effect against SA Objective 6 with an element of uncertainty until lower level assessments have been completed. It should be noted that Highways Development Management comments⁵⁹ identify that they are unlikely to support development at this site given the very poor access.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

⁵⁸ Gloucestershire County Council

⁵⁹ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

The site is greenfield land located in between a Local Nature Reserve just north of the site, and priority habitats of Deciduous Woodland to the south of the site. Tree corridors run through the site connecting to the woodland, and development at the site could therefore lead to fragmentation of GI corridors connecting the two biodiversity sites. As such, it is considered that there is the potential for a minor long-term negative effect against SA Objective 10.

The site was not assessed in the GCT JCS Landscape Sensitivity Study⁶⁰, however it is located wholly within the AONB. The site is greenfield land containing trees, and the Council's Sites Assessment identifies that it plays an important part in the setting of the escarpment. It is considered that there is the potential for a major long-term negative effect on landscapes (SA Objective 11a) through development in a sensitive landscape area and previously undeveloped area. Any development proposals for the site should seek to retain the existing trees on site. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site lies adjacent to the Grade II Listed Cheltenham Park Hotel, Mitigation provided through the GCT JCS should ensure that development does not lead to any significant effects. Taking into account the available mitigation and the capacity of the site, it is considered that there is the potential for a residual neutral effect against SA Objective 12.

⁶⁰ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-ics.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

Charlton Park

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP063: Reeves Field, Old Bath Rd	+	++	++	+	-	+	+	0?	0?	-	+	+	-	+	0	?	-

Summary:

The Council Sites Assessment has identified that site CP063 has the capacity to accommodate 40 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 4.52 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located adjacent to Sandford Mill Cox's Meadow Public Green Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is located within 800m of one of the services and facilities identified within the Council's accessibility assessment⁶¹, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this is considered unlikely. Potential for a residual minor negative effect against SA Objective 4.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance accessibility at the site.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located in between Deciduous Woodland Priority Habitats. Trees that border the site may provide GI connections between the two habitats. The Cheltenham Local Plan can, through appropriate policy

⁶¹ Gloucestershire County Council

wording, ensure that development retains and enhances these GI connections, with the potential for a minor long-term positive effect against SA Objective 10 with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study⁶², and it is not located within or adjacent to the AONB. The site is greenfield land and used as private sports pitches by Cheltenham College. The site is located within the Central Conservation Area and the Council's Sites Assessment identifies that there are key views to the scarp across the site. It is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a sensitive historic townscape and previously undeveloped area. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located adjacent to the Grade II Listed Thirstaine Hall, which includes Listed boundary walls and gates. There are further designated Listed Buildings and non-designated heritage assets located along the A40 (Old Bath Road). The site is also located within the Central Conservation Area. Mitigation provided through the GCT JCS should ensure sensitive and responsive design that respects the historic townscape, and that development will not lead to any significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Taking into account the available and potential mitigation, and the capacity of the site, it is considered that there is the potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP102: Spirax Sarco HQ, Charlton House	++	++	++	+	-- ?	+	+	- ?	- ?	-	-	+ ?	+	+	0	?	+

Summary:

The site has not been assessed through the SALA, however the Council Sites Assessment has identified that site CP102 has the capacity to accommodate 63 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 2 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Sandford Mill Cox's Meadow and Charlton Park. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is however located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment⁶³, and development may increase reliance on the private vehicle. Potential for a major negative effect against SA Objective 4. Given the capacity of the site there is the potential for development to enhance service and facility provisions in this area,

⁶² GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

⁶³ Gloucestershire County Council

which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance accessibility at this site.

There is existing access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Although mitigation is provided through the GCT JCS and Cheltenham Local Plan, given the higher capacity of the site, it is considered that there is the potential for residual minor negative effects against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The area of the site that is south of the River Chelt is located within an area of flood risk, and is a significant proportion of the site. Mitigation is likely to be difficult and/or expensive; development therefore is considered to have the potential for a minor negative effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located adjacent to a Deciduous Woodland Priority Habitat. Brownfield land is considered to have the potential to support a large amount of biodiversity⁶⁴, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use, it is considered that there are potential opportunities to enhance biodiversity on site, which could further support the existing priority habitats. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study⁶⁵, and it is not located within or adjacent to the AONB. The site is predominantly brownfield land containing the Spirax Sarco Headquarters and car parking. It is considered that there is the potential for a minor long-term positive effect on landscapes (SA Objective 11a) through regeneration of this land. As the site is predominantly brownfield land it is also considered to have the potential for a minor positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site contains the Grade II Listed Charlton House, and is located adjacent to more Listed Buildings in the north, east and south of the site. Mitigation provided through the GCT JCS should ensure that development will not lead to any significant negative effects, and that the Listed Building is retained in development. Should Spirax Sarco relocate then development has the potential to secure ongoing management and maintenance the

⁶⁴ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

⁶⁵ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-ics.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

designated heritage asset. Taking into account the available mitigation and capacity of the site, it is considered that there is the potential for a residual neutral effect against SA Objective 12.

College

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP074: Rodney Rd Car Park, Rodney Rd	+	+	++	+	+	+	+	0?	0?	-	--	+	+	+	0	?	++
<p>Summary: The Council Sites Assessment has identified that site CP074 has the capacity to accommodate 22 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.25 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.</p> <p>The site is surrounded by compatible land uses, and is located within 300m of Sandford Park, Imperial Gardens and Montpellier Gardens. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is also located within 800m of most of the services and facilities identified within the Council's accessibility assessment⁶⁶. Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to secondary education, a children centre and/or A&E could enhance the significance of the identified positive effects.</p> <p>The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance accessibility at this site.</p> <p>There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Development Management comments⁶⁷ further identify that the loss of parking on site may need consideration. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.</p> <p>The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is also located wholly within Flood Risk Zone 3; development therefore has the potential for a major long-term negative effect against SA Objective 9.</p>																	

⁶⁶ Gloucestershire County Council

⁶⁷ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of a Deciduous Woodland Priority Habitat. Brownfield land is considered to have the potential to support a large amount of biodiversity⁶⁸, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use as a car park, it is considered that there are potential opportunities to enhance biodiversity on site, which could further support the existing priority habitats. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site was not assessed in the GCT JCS Landscape Sensitivity Study⁶⁹, and it is not located within or adjacent to the AONB. The site is brownfield land in the urban area, currently used as a car park. It is considered that there is the potential for a minor long-term positive effect on townscape (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located within the Central Conservation Area, and adjacent to the Grade II Listed Oriel Villas, it is also surrounded by numerous other Listed Buildings. Mitigation provided through the GCT JCS should ensure that development will not lead to any significant effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Taking into account the potential and available mitigation, and the capacity of the site, it is considered overall that there is the potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP094: Sandford Lido Car Park	+ ?	+ ?	++	+	+	+	+	- ?	0 ?	-	-	+ ?	+	+	0	?	+

Summary:

The site is assessed as not suitable, available or achievable within the SALA, however the Council Sites Assessment has identified that site CP094 has the capacity to accommodate 10 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.27 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a. At this stage however to reflect the findings of the SALA there is an element of uncertainty.

The site is located adjacent to a hospital and as such there may be minor short-term negative effects on health during the construction phases of development at this site, mitigation will be required to minimise the effects. The site is however located adjacent to Sandford Park. As such, it is considered that there is the potential for a minor negative effect against SA Objective 3 in the short-term, however in the longer-term it is considered overall that there is the potential for a minor positive effect.

⁶⁸ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

⁶⁹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-ics.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is also located within 800m of most of the services and facilities identified within the Council's accessibility assessment⁷⁰. Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to secondary education, a children centre, a major supermarket and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections at this site could enhance the identified positive effects.

Development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Development Management comments⁷¹ further identify that the loss of parking on site may need consideration. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 7, with an element of uncertainty until lower level assessments have been completed, however given that the site has poor access, it is considered that there is still the potential for a minor negative effect against SA Objective 6 with an element of uncertainty until lower level assessments have been completed.

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The majority of the site is located within Flood Risk Zone 2, mitigation is likely to be difficult and/or expensive; development is therefore considered have the potential for a minor negative effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity⁷², and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use as a car park, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

⁷⁰ Gloucestershire County Council

⁷¹ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

⁷² JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

This site was not assessed in the GCT JCS Landscape Sensitivity Study⁷³, and it is not located within or adjacent to the AONB. The site is brownfield land in the urban area, currently used as a car park. It is considered therefore that there is the potential for a minor long-term positive effect on townscape (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located within the Central Conservation Area and adjacent to Sandford Lido, a local non-designated heritage asset. It is also in close proximity to further designated Listed Buildings along Keynsham Road and College Baths Road. Mitigation provided through the GCT JCS should ensure that development will not lead to any significant effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Taking into account the potential and available mitigation and the capacity of the site, it is considered overall that there is the potential for a residual neutral effect against SA Objective 12.

⁷³ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-ics.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

Hester's Way

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP037: Land at Fiddler's Green, adjacent to Hayden	++	++	++	-	-- ?	+	+	-- ?	-- ?	0	+	+	-	+	0	?	-
<p>Summary: The Council Sites Assessment has identified that site CP037 has the capacity to accommodate 347 new dwellings in the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 18.34 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.</p> <p>Although the site is located within 300m of Open Space, including Fiddlers Green Lane Public Green Space, it is also adjacent to Hayden Sewerage Works and covered by a Cordon Sanitaire (identified in the existing Local Plan as a Development Exclusion Zone). As such it is considered that there is the potential for a minor negative effect on health (SA Objective 3).</p> <p>The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is however located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment⁷⁴, and development may increase reliance on the private vehicle in this respect. Potential for a major negative effect against SA Objective 4. Given the capacity of the site there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.</p> <p>The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections at this site could enhance the identified positive effects.</p> <p>There is no satisfactory access to the site, and development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the M5, B4063 and B4634). Development is likely to exacerbate air quality issues in this area also. Highways Development Management comments⁷⁵ identify that there are capacity issues at Arle Court roundabout and the potential additional network congestion, modelling and links need consideration. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.</p>																	

⁷⁴ Gloucestershire County Council

⁷⁵ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of Lowland Meadow Priority Habitats. The Cheltenham Local Plan can support habitat enhancement on site through appropriate policy wording. As such, it is considered that there is the potential for a minor positive effect against SA Objective 10 with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study⁷⁶ as of medium-low landscape sensitivity. The site is entirely greenfield land. It is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. It should be noted that given the size of this site, the negative effects are considered to be of greater significance than at the surrounding smaller greenfield sites. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
CP038: Land at Golden Valley, Pheasant Lane	++	++	++	+	-- ?	-	++	-- ?	-- ?	-	0	+	-	--	0	?	-

Summary:
The Council Sites Assessment has identified that site CP038 has the capacity to accommodate 212 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 11.23 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of existing public open space, including Meadow and Nunny Close Open Space, Coburn Gardens, Caine Square and Golden Valley Open Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3.

⁷⁶ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-ics.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is however located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment⁷⁷, and development may increase reliance on the private vehicle in this respect. Potential for a major negative effect against SA Objective 4. Given the capacity of the site there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.

The site is located within 800m of a bus stop and given this distance, development at the site is considered less likely to contribute to a reduced reliance on the private vehicle with the potential for a minor negative effect against SA Objective 5a. The site is located within 400m of both PRowS and a Sustrans National Cycle Route, and as such development has opportunities to promote these modes of transport with the potential for a major long-term positive effect against SA Objective 5b.

There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the M5, B4063 and B4634). Development is likely to exacerbate air quality issues in this area also. Highways Development Management comments⁷⁸ identify that there are capacity issues at Arle Court roundabout and the potential additional network congestion, modelling and links need consideration. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The north west corner of the site lies partially over a minor aquifer of intermediate vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The northern border of the site is located within an area of flood risk, however development could avoid this area of the site, and mitigation provided through the Local Plan and higher level JCS is considered sufficient to ensure that there will be no significant negative effects; potential for a residual neutral effect against SA Objective 9.

The site contains an area of Traditional Orchard Priority Habitat. The Cheltenham Local Plan can, through appropriate policy wording; ensure that development retains the existing Priority Habitat on site, support habitat enhancement on site, and support the creation of GI linkages with further woodland habitats in the wider area. As such, it is considered that there is the potential for a minor positive effect against SA Objective 10 with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study⁷⁹ as of medium to medium-low landscape sensitivity. The site is predominantly greenfield land and contains trees and hedgerows. It is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a largely undeveloped area. Any development proposal

⁷⁷ Gloucestershire County Council

⁷⁸ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

⁷⁹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-ics.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

for the site should also seek to retain the existing trees and hedgerows. As the site is predominantly greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site is located adjacent to The Old Chapel; a local non-designated heritage asset. Given the capacity of the site it is considered that development has the potential to alter the setting of the non-designated heritage asset, however mitigation provided through the GCT JCS, and available at the project level, should ensure that it will not lead to any significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Taking account of the potential and available mitigation it is considered that there is the potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP039: Land north of Bamfurlong Lane	++	++	++	+	-- ?	--	++	-- ?	-- ?	0	+	+	-	--	0	?	-

Summary:

The Council Sites Assessment has identified that site CP039 has the capacity to accommodate 179 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 7.11 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Chalford Avenue Open Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. However, the site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment⁸⁰, and development may increase reliance on the private vehicle in this respect. Potential for a major negative effect against SA Objective 4. Given the capacity of the site there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.

The site is not located within a reasonable walking distance (800m) of either a bus stop or train station. Development at this site could increase reliance on the private vehicle with the potential for a major negative effect against SA Objective 5a. The site is however located within 400m of both PRowS and a Sustrans National Cycle Route, and as such development has opportunities to promote these modes of transport with the potential for a major long-term positive effect against SA Objective 5b.

⁸⁰ Gloucestershire County Council

There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the M5, A40, B4063 and B4634). Development is likely to exacerbate air quality issues in this area also. Highways Development Management comments⁸¹ identify that there are capacity issues at Arle Court roundabout and the potential additional network congestion, modelling and links need consideration. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of Traditional Orchard Priority Habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity⁸², and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. As such, it is considered that there is the potential for a minor positive effect against SA Objective 10 with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study⁸³ as of medium-low landscape sensitivity. The site contains areas of previously developed land (scrapyard with ancillary buildings and parking, and kennels), however it is predominantly greenfield land. As such, it is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a largely undeveloped area. As the site is predominantly greenfield land it is also considered to have the potential for minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site contains The Old Chapel; a local non-designated heritage asset. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. As such, it is considered that there is the potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14

⁸¹ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze

<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

⁸² JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

⁸³ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

CP040: Briarfields Motel and Touring Park, Bamfurlong Lane	++	++	++	+	-- ?	-	++	-- ?	-- ?	0	+	+ ?	+	--	0	?	+
<p>Summary: The Council Sites Assessment has identified that site CP040 has the capacity to accommodate 65 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 1.96 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.</p> <p>The site is surrounded by compatible land uses, and is located within 300m of Golden Valley and Chalford Avenue Open Spaces. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. However, the site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment⁸⁴, and development may increase reliance on the private vehicle in this respect. Potential for a major negative effect against SA Objective 4. Given the capacity of the site there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.</p> <p>The site is located within 800m of a bus stop and given this distance, development at the site is considered less likely to contribute to a reduced reliance on the private vehicle with the potential for a minor negative effect against SA Objective 5a. The site is however located within 400m of both PRoWs and a Sustrans National Cycle Route, and as such development has opportunities to promote these modes of transport with the potential for major long-term positive effect against SA Objective 5b.</p> <p>There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the M5, A40, B4063 and B4634). Development is likely to exacerbate air quality issues in this area also. Highways Development Management comments⁸⁵ identify that there are capacity issues at Arle Court roundabout and the potential additional network congestion, modelling and links need consideration. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.</p> <p>The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.</p>																	

⁸⁴ Gloucestershire County Council

⁸⁵ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of Traditional Orchard and Deciduous Woodland Priority Habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity⁸⁶, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use as a motel and touring park, it is considered that there are potential opportunities to enhance biodiversity on site, which could further support the existing priority habitats. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site was not assessed in the GCT JCS Landscape Sensitivity Study⁸⁷, and it is not located within or adjacent to the AONB. The site is predominantly brownfield land and contains a Motel and Touring Park. It is considered that there is the potential for a minor long-term positive effect on landscapes (SA Objective 11a) through the regeneration of this land. As the site is predominantly brownfield land it is also considered to have the potential for a minor positive effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective														14		
	1	2	3	4	5	6	7	8	9	10	11	12	13				
CP041: Land between A40 and Bamfurlong Lane (east)	+	+	++	+	--	-	++	-?	-?	0	+	+	++	--	0	?	+

Summary:

The Council Sites Assessment has identified that site CP041 has the capacity to accommodate 33 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.98 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Golden Valley and Meadow and Nunny Close Open Spaces. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. However, the site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment⁸⁸, and development may increase reliance on the private vehicle in this respect.

⁸⁶ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

⁸⁷ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

⁸⁸ Gloucestershire County Council

Potential for a major negative effect against SA Objective 4. Given the capacity of the site, development is unlikely to deliver any significant improvements to provisions in this area.

The site is located within 800m of a bus stop and given this distance, development at the site is considered less likely to contribute to a reduced reliance on the private vehicle with the potential for a minor negative effect against SA Objective 5a. The site is however located within 400m of both PRow and a Sustrans National Cycle Route, and as such development has opportunities to promote these modes of transport with the potential for a major long-term positive effect against SA Objective 5b.

There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the M5, A40, B4063 and B4634). Development is likely to exacerbate air quality issues in this area also. Highways Development Management comments⁸⁹ identify that there are capacity issues at Arle Court roundabout and the potential additional network congestion, modelling and links need consideration. Given the lower capacity of the site however, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered that there is the potential for a residual minor negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within a area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of Deciduous Woodland Priority Habitat. Brownfield land is considered to have the potential to support a large amount of biodiversity⁹⁰, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current industrial use, it is considered that there are potential opportunities to enhance biodiversity on site, which could further support the existing priority habitats. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site was not assessed in the GCT JCS Landscape Sensitivity Study⁹¹, and it is not located within or adjacent to the AONB. The site is predominantly brownfield land in industrial use. It is considered therefore that there is the potential for a major long-term positive effect on landscapes (SA Objective 11a) through the regeneration of this land and removal of industrial buildings. It should be noted that there is a large group of trees in the south west corner of the site, and development should seek to retain these. As the site is predominantly brownfield land it is also considered to have the potential

⁸⁹ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
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⁹⁰ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

⁹¹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-ics.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

for a minor positive effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP042: Land between A40 and Bamfurlong Lane (west)	++	++	++	+	-- ?	-	++	-- ?	-- ?	0	+	+	-	--	0	?	-

Summary:

The Council Sites Assessment has identified that site CP042 has the capacity to accommodate 124 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 4.92 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Golden Valley and Chalford Avenue Open Spaces. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. However, the site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment⁹², and development may increase reliance on the private vehicle in this respect. Potential for major negative effect against SA Objective 4. Given the capacity of the site there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.

The site is located within 800m of a bus stop and given this distance, development at the site is considered less likely to contribute to a reduced reliance on the private vehicle with the potential for a minor negative effect against SA Objective 5a. The site is however located within 400m of both PRow's and a Sustrans National Cycle Route, and as such development has opportunities to promote these modes of transport with the potential for a major long-term positive effect against SA Objective 5b.

The site has poor access, and development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the M5, A40, B4063 and B4634). Development is likely to exacerbate air quality issues in this area also. Highways Development Management comments⁹³ identify that there are capacity issues at Arle Court roundabout and the potential additional network

⁹² Gloucestershire County Council

⁹³ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

congestion, modelling and links need consideration. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site contains an area of Deciduous Woodland Priority Habitat that extends east of the site. The Cheltenham Local Plan can, through appropriate policy wording; ensure that development retains the existing Priority Habitat on site, and support habitat enhancement on site. As such, it is considered that there is the potential for a minor positive effect against SA Objective 10 with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study⁹⁴ as of medium-low landscape sensitivity. The site contains some brownfield land however it is predominantly greenfield. Development therefore has the potential for minor negative effects on landscapes through development in a previously undeveloped area. As the site is predominantly Greenfield land is also has the potential for minor negative effects on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

⁹⁴ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-ics.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

Lansdown

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP075: Royal Well & Municipal Offices	+	+	++	+	+	+	+	0?	0?	-	-	+	+	+	0	?	+

Summary:

The Council Sites Assessment has identified that site CP075 has the capacity to accommodate 36 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.86 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Imperial Gardens, and Chelt Walk Public Green Spaces. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is also located within 800m of most of the services and facilities identified within the Council's accessibility assessment⁹⁵. Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to secondary education, a children centre and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance accessibility at this site.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. A large section of the site is located within an area of flood risk, mitigation is likely to be difficult and/or expensive; it is therefore considered that development has the potential for a minor negative effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of a Deciduous Woodland Priority Habitat. Brownfield land is considered to have the potential to support a large amount of biodiversity⁹⁶, and the Cheltenham Local Plan can support

⁹⁵ Gloucestershire County Council

⁹⁶ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current brownfield uses, it is considered that there are potential opportunities to enhance biodiversity on site, which could further support the existing priority habitats. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site was not assessed in the GCT JCS Landscape Sensitivity Study⁹⁷, and it is not located within or adjacent to the AONB. The site is predominantly brownfield land currently in use as council offices, bus station, car park and open space. It is considered that there is the potential for a minor long-term positive effect on townscape (SA Objective 11a) through the regeneration of this land. It should also be noted that there are trees in the centre of the site, and development should seek to retain these. As the site is predominantly brownfield land it is also considered to have the potential for a minor positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site contains the Grade II* Listed Promenade, and is surrounded by further Listed Buildings and located within the Central Conservation Area. Mitigation provided through the GCT JCS, and available at the project level, should ensure sensitive and responsive design that respects the historic townscape, and should ensure that development will not lead to any significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Taking into account the potential and available mitigation, and the capacity of the site, it is considered that there is the potential for a residual neutral effect against SA Objective 12.

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Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP076: St Georges House, Bayshill Rd	++	+	++	+	+	+	+	0?	0?	0	+	+	+	+	+	?	++

Summary:

The Council Sites Assessment has identified that site CP076 has the capacity to accommodate 48 new dwellings within the early stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 0.38 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Chelt Walk, Imperial Gardens, and Montpellier Gardens. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is also located within 800m of most of the services and facilities identified

⁹⁷ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-ics.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

within the Council's accessibility assessment⁹⁸. Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to secondary education, a children centre and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance accessibility at this site.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of a Deciduous Woodland Priority Habitat. Brownfield land is considered to have the potential to support a large amount of biodiversity⁹⁹, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current brownfield uses, it is considered that there are potential opportunities to enhance biodiversity on site, which could further support the existing priority habitats. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site was not assessed in the GCT JCS Landscape Sensitivity Study¹⁰⁰, and it is not located within or adjacent to the AONB. The site is brownfield within the urban area, previously used as offices but now vacant. It is considered that there is the potential for a minor long-term positive effect on townscape (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site contains the Grade II Listed Kraft Foods Ltd offices, and the Grade II Listed St Georges House. It is also surrounded by more Listed Buildings and located within the Central Conservation Area. Mitigation provided through the GCT JCS, and available at the project level, should ensure sensitive

⁹⁸ Gloucestershire County Council

⁹⁹ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

¹⁰⁰ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

and responsive design that respects the historic townscape, and should ensure that development will not lead to any significant negative effects. Given the vacant nature of the site, development has the opportunity to secure the future management and maintenance of these buildings which is considered to have the potential for a minor long-term positive effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP077: Land at St Georges Place / St James Square	0	+	++	+	+	+	++	0?	0?	0	--	+?	++	+	0	?	++

Summary:

The Council Sites Assessment has identified that site CP077 has the capacity to accommodate 0.66 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Chelt Walk, and Imperial Gardens. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is also located within 800m of most of the services and facilities identified within the Council's accessibility assessment¹⁰¹. Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to secondary education, a children centre and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of both PRowS and a Sustrans National Cycle Route, and as such development has opportunities to promote these modes of transport with the potential for a major long-term positive effect against SA Objective 5b.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Highways Development Management comments¹⁰² also identify that the loss of parking on site would require further assessment of parking provision. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, and available at the project level, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is located wholly within Flood Risk Zone 3; development therefore has the potential for a major long-term negative effect against SA Objective 9.

¹⁰¹ Gloucestershire County Council

¹⁰² Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of a Deciduous Woodland Priority Habitat. Brownfield land is considered to have the potential to support a large amount of biodiversity¹⁰³, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current brownfield uses, it is considered that there are potential opportunities to enhance biodiversity on site, which could further support the existing priority habitats. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site was not assessed in the GCT JCS Landscape Sensitivity Study¹⁰⁴, and it is not located within or adjacent to the AONB. The site is brownfield land in the urban area, currently used as a temporary car park, and containing vacant and derelict buildings. Given the derelict nature of the site, it is considered therefore that there is the potential for a major long-term positive effect on townscape (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located within the Central Conservation Area, and is surrounded by designated Listed Buildings and local non-designated heritage assets (e.g. the former fire station). Mitigation provided through the GCT JCS, and available at the project level, should ensure sensitive and responsive design that respects the historic townscape, and should ensure that development will not lead to any significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Taking into account the potential and available mitigation and the capacity of the site it is considered that there is the potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP078: Rivershill House, St Georges Rd	++	+	++	+	+	+	++	0?	0?	0	+	+?	+	+	0	?	++

Summary:

The Council Sites Assessment has identified that site CP078 has the capacity to accommodate 44 new dwellings within the early stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 0.42 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Honeybourne Line, and Chelt Walk Public Green Spaces. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area

¹⁰³ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

¹⁰⁴ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

with the potential for a major positive effect against SA Objective 2b. The site is also located within 800m of most of the services and facilities identified within the Council's accessibility assessment¹⁰⁵. Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to secondary education, a children centre and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of both PRowS and a Sustrans National Cycle Route, and as such development has opportunities to promote these modes of transport with the potential for a major long-term positive effect against SA Objective 5b.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of a Deciduous Woodland Priority Habitat. Brownfield land is considered to have the potential to support a large amount of biodiversity¹⁰⁶, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current brownfield uses, it is considered that there are potential opportunities to enhance biodiversity on site, which could further support the existing priority habitats. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site was not assessed in the GCT JCS Landscape Sensitivity Study¹⁰⁷, and it is not located within or adjacent to the AONB. The site is brownfield land in the urban area, containing a vacant office building. It is considered that there is the potential for a minor long-term positive effect on townscape (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

¹⁰⁵ Gloucestershire County Council

¹⁰⁶ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

¹⁰⁷ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The site is adjacent to numerous designated Listed Buildings and local non-designated heritage assets. The site is also located within the Central Conservation Area. Mitigation provided through the GCT JCS, and available at the project level, should ensure sensitive and responsive design that respects the historic townscape, and should ensure that development will not lead to any significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Taking into account the potential and available mitigation and the capacity of the site, it is considered that there is the potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP081: Land at Chester Walk Car Park	+	+	++	+	+	+	+	0?	0?	-	+	+	+	+	0	?	++

Summary:

The Council Sites Assessment has identified that site CP081 has the capacity to accommodate 14 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.2 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of existing public open space, including The Promenade, Royal Well Open Space, Beech House and Hanna Court Green Spaces and High Street Bowling Green. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is also located within 800m of most of the services and facilities identified within the Council's accessibility assessment¹⁰⁸. Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to secondary education, children centre and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections at this site could significantly enhance the identified positive effects.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Highways Development Management comments¹⁰⁹ also identify that due to the potential loss of parking on site, further parking provision assessment would be required. However, given the low capacity of the site, and the mitigation available through the

¹⁰⁸ Gloucestershire County Council

¹⁰⁹ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity¹¹⁰, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use as a car park, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site was not assessed in the GCT JCS Landscape Sensitivity Study¹¹¹, and it is not located within or adjacent to the AONB. The site is brownfield land in the urban area, currently used as a car park. It is considered that there is the potential for a minor long-term positive effect on townscape (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11.

The site is located adjacent to numerous Listed Buildings, including the Grade I Listed St Mary's Church. It is also located within the Central Conservation Area. Mitigation provided through the GCT JCS, and available at the project level, should ensure sensitive and responsive design that respects the historic townscape, and should ensure that development does not lead to any significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Taking account of the potential and available mitigation and the capacity of the site, it is considered that there is the potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP082: Rear of High St Car Park	+	+	++	+	+	+	+	0?	0?	-	+	+?	+	+	0	?	++
Summary:																	

¹¹⁰ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

¹¹¹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The Council Sites Assessment has identified that site CP082 has the capacity to accommodate 17 new dwellings in the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.2 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of existing public open space, including The Promenade, Royal Well Open Space, Beech House and Hanna Court Green Spaces and High Street Bowling Green. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is also located within 800m of most of the services and facilities identified within the Council's accessibility assessment¹¹². Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to secondary education, a children centre and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance accessibility at this site.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Development Management comments¹¹³ further identify that the loss of parking on site may need consideration. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity¹¹⁴, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use as a car park, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

¹¹² Gloucestershire County Council

¹¹³ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze

<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

¹¹⁴ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

This site was not assessed in the GCT JCS Landscape Sensitivity Study¹¹⁵, and it is not located within or adjacent to the AONB. The site is brownfield land in the urban area, currently used as a car park. It is considered that there is the potential for a minor long-term positive effect on townscape (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located adjacent to numerous Listed Buildings, including the Grade I Listed St Mary's Church. It is also located within the Central Conservation Area. Mitigation provided through the GCT JCS, and available at the project level, should ensure sensitive and responsive design that respects the historic townscape, and should ensure that development does not lead to any significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Taking account of the potential and available mitigation and the capacity of the site, it is considered that there is the potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP096: St Georges Rd Car Park	+	+	++	+	+	+	+	- ?	0 ?	0	+	+ ?	+	+	0	?	+

Summary:

The Council Sites Assessment has identified that site CP096 has the capacity to accommodate 9 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.26 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Chelt Walk, Imperial Gardens, and Montpellier Gardens. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is also located within 800m of most of the services and facilities identified within the Council's accessibility assessment¹¹⁶. Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to secondary education, a children centre and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections at this site could enhance the identified positive effects.

¹¹⁵ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

¹¹⁶ Gloucestershire County Council

Development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Development Management comments¹¹⁷ further identify that the loss of parking on site may need consideration. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 7, with an element of uncertainty until lower level assessments have been completed, however given that the site has no satisfactory access, it is considered that there is still the potential for a minor negative effect against SA Objective 6 with an element of uncertainty until lower level assessments have been completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of a Deciduous Woodland Priority Habitat. Brownfield land is considered to have the potential to support a large amount of biodiversity¹¹⁸, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current brownfield uses, it is considered that there are potential opportunities to enhance biodiversity on site, which could further support the existing priority habitats. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site was not assessed in the GCT JCS Landscape Sensitivity Study¹¹⁹, and it is not located within or adjacent to the AONB. The site is brownfield land in the urban area, currently used as a car park. It is considered that there is the potential for a minor long-term positive effect on townscape (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11

The site is adjacent to numerous designated Listed Buildings and a local non-designated heritage asset. The site is also located within the Central Conservation Area. Mitigation provided through the GCT JCS, and available at the project level, should ensure sensitive and responsive design that respects the historic townscape, and should ensure that development will not lead to any significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Taking into account the potential and available mitigation and the capacity of the site, it is considered that there is the potential for a residual neutral effect against SA Objective 12.

¹¹⁷ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

¹¹⁸ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

¹¹⁹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

Leckhampton

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP031: Land off Leckhampton Rd	+	+	--	+	-	+	+	- ?	0 ?	-	+	+ ?	--	+	0	?	-

Summary:

The Council Sites Assessment has identified that site CP031 has the capacity to accommodate 15 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.6 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of existing public open space, including The Tramway Green Corridor, Undercliff Avenue Open Space, Daisy Bank Field and Leckhampton Hill. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3.

The site is not located within 800m of an existing employment area with the potential for a major negative effect against SA Objective 2b. However, this should be considered alongside the provision of employment on site, which can mitigate the negative effects to some degree. The site is located within 800m of some of the services and facilities identified within the Council's accessibility assessment¹²⁰, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this is considered unlikely. Potential for a residual minor negative effect against SA Objective 4.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the accessibility at this site.

Development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 7, with an element of uncertainty until lower level assessments have been completed, however given that the site has poor access, it is considered that there is still the potential for a minor negative effect against SA Objective 6 with an element of uncertainty until lower level assessments have been completed.

¹²⁰ Gloucestershire County Council

The whole site overlies a major aquifer of low vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of Wood-pasture and Parkland Priority Habitats. The Cheltenham Local Plan can support habitat enhancement on site through appropriate policy wording. As such, it is considered that there is the potential for a minor positive effect against SA Objective 10 with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study¹²¹, it is greenfield land located adjacent to the AONB. Development therefore has the potential to affect the setting of the AONB and mitigation may be difficult as the AONB slopes steeply uphill south of the site. It is therefore considered that there is the potential for a residual major long-term negative effect on landscapes (SA Objective 11a) through development in a sensitive landscape area and previously undeveloped area. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
CP098: Land south of Collum End Rise	++ ?	++ ?	--	+	+	+	+	- ?	- ?	-	+	+ ?	--	--	0	?	-

Summary:

The site is assessed as not suitable, available or achievable within the SALA, however the Council Sites Assessment has identified that site CP098 has the capacity to accommodate 62 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 3.29 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a. At this stage however to reflect the findings of the SALA there is an element of uncertainty.

The site is surrounded by compatible land uses, and is located within 300m of existing public open space, including The Tramway Green Corridor and Undercliff Avenue Open Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3.

¹²¹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The site is not located within 800m of an existing employment area with the potential for a major negative effect against SA Objective 2b. However, this should be considered alongside the provision of employment on site, which can mitigate the negative effects to some degree. The site is however located within 800m of most of the services and facilities identified within the Council's accessibility assessment¹²². Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to secondary and higher education, a GP surgery, pharmacy and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is no satisfactory access to the site, and development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Development Management comments¹²³ further identify that there are potential access issues if linked to Church Road. Although mitigation is provided through the GCT JCS and Cheltenham Local Plan, given the higher capacity of the site, it is considered that there is the potential for residual minor negative effects against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The whole site overlies a major aquifer of low vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of Deciduous Woodland, and Wood-pasture and Parkland Priority Habitats. The Cheltenham Local Plan can support habitat enhancement on site through appropriate policy wording. As such, it is considered that there is the potential for a minor positive effect against SA Objective 10 with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study¹²⁴, however it is located wholly within the AONB. The site is greenfield land and contains trees. It is considered that there is the potential for a major long-term negative effect on landscapes (SA Objective 11a) through development in a sensitive landscape area and previously undeveloped area. Any development proposals for the site should seek to retain the

¹²² Gloucestershire County Council

¹²³ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

¹²⁴ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

existing trees. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site is located adjacent to the Grade II* Listed Leckhampton Court and Grade II* Listed St Peters Church. The site is also located within 250m of the Moated Site and Fishponds at Church Farm Scheduled Monument. Mitigation provided through the GCT JCS should ensure that development would not lead to any significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Taking into account the potential and available mitigation and capacity of the site, it is considered that there is the potential for a residual neutral effect against SA Objective 12.

Oakley

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP023: Priors Farm Fields (land at Oakley)	++	0	++	--	- ?	+	+	- ?	- ?	0	+	+	--	+	-	?	-
<p>Summary: The Council Sites Assessment has identified that site CP023 has the capacity to accommodate 126 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1.</p> <p>The site is surrounded by compatible land uses, however development at the site could result in the loss of Priors Farm Public Green Space. There are further areas of open space in close proximity to the site (Priors Farm Estate Amenity Greenspace), however the green space on site is the largest space in this area of the Borough. As such, it is considered that development at this site has the potential for a major negative effect against SA Objective 3. The potential effects could be mitigated if development retains the existing Public Green Space designated area.</p> <p>The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is located within 800m of some of the services and facilities identified within the Council's accessibility assessment¹²⁵, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this may be possible. Potential for a residual minor negative effect against SA Objective 4 with an element of uncertainty until project level details arise.</p> <p>The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance accessibility at this site.</p> <p>The site has poor access, and development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Highways Development Management comments¹²⁶ also identify that capacity analysis at nearby junctions may be required. Although mitigation is provided through the GCT JCS and Cheltenham Local Plan, given the higher capacity of the site, it is considered that there is the potential for residual minor negative effects against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.</p>																	

¹²⁵ Gloucestershire County Council

¹²⁶ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is also not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of Deciduous Woodland Priority Habitats. The Cheltenham Local Plan can support habitat enhancement on site through appropriate policy wording, and there is the opportunity to provide linkages with the existing priority habitats. As such, it is considered that there is the potential for a minor positive effect against SA Objective 10 with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study¹²⁷, however the Council's Sites Assessment identifies that it borders the AONB to the east and that the eastern part of the site has an important role in the setting of the AONB. Development therefore has the potential to affect the AONB setting. The site is entirely greenfield land and contains Priors Farm Playing Field and Public Green Space. It is considered that there is the potential for a major long-term negative effect on landscapes (SA Objective 11a) through development in a sensitive landscape area and previously undeveloped area. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located adjacent to Bouncer's Lane Cemetery Registered Park and Garden, which also contains Listed Buildings. Development has the potential alter the setting of the designated heritage asset as development encroaches further from the existing urban area enclosing the cemetery, on its southern and south eastern borders. Mitigation provided through the GCT JCS should ensure that development does not lead to any significant negative effects, however given the capacity of the site, it is considered that there is the potential for a residual minor long-term negative effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP069: Cakebridge Place	+?	+?	++	+	-	+	+	0?	0?	-	--	+?	+	+	0	?	++

Summary:

The site is assessed as not suitable, available or achievable within the SALA, however the Council Sites Assessment has identified that site CP069 has the capacity to accommodate 16 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.55 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a. At this stage however to reflect the findings of the SALA there is an element of uncertainty.

¹²⁷ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The site is surrounded by compatible land uses, and is located within 300m of Pittville Crescent, and Whaddon Road Public Green Spaces. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is located within 800m of some of the services and facilities identified within the Council's accessibility assessment¹²⁸, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this is considered unlikely. Potential for a residual minor negative effect against SA Objective 4.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance accessibility at this site.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site lies wholly within Flood Risk Zone 2, mitigation is likely to be difficult and/or expensive; it is therefore considered at this stage that there is the potential for a major long-term negative effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity¹²⁹, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study¹³⁰, and it is not located within or adjacent to the AONB. The site is brownfield land containing pre-fabricated bungalows within the urban area. Development is considered to have the potential for a minor long-term positive effect on the landscape (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a

¹²⁸ Gloucestershire County Council

¹²⁹ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

¹³⁰ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located adjacent to a local non-designated heritage asset. Mitigation provided through the GCT JCS should ensure that development will not lead to any significant negative effects. Taking account of the available mitigation and the low capacity of the site, it is considered that there is the potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP070: Land at Prestbury Rd	+	+	++	+	-	+	+	0?	0?	-	+	+	++	+	0	?	++

Summary:

The Council Sites Assessment has identified that site CP070 has the capacity to accommodate 8 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.23 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Pittville Crescent, Pittville Circus, and Whaddon Road Public Green Spaces. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is located within 800m of some of the services and facilities identified within the Council's accessibility assessment¹³¹, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this is considered unlikely. Potential for a residual minor negative effect against SA Objective 4.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

¹³¹ Gloucestershire County Council

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity¹³², and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current industrial uses, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study¹³³, and it is not located within or adjacent to the AONB. The site is brownfield land within the urban area currently in industrial use. Given its use; development is considered to have the potential for a major long-term positive effect on townscapes (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site contains two local non-designated heritage assets; 83 Prestbury Road and Tomds and Bliss Ltd. It is assumed that development can retain these assets, and the Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. As such, it is considered that there is the potential for residual neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP105: Land at Whaddon Rd	++	0	++	+	-	+	+	0?	0?	-	0	+	+	+	0	?	++

Summary:

The Council Sites Assessment has identified that site CP105 has the capacity to accommodate 7 new dwellings within the early stages of the plan period with the potential for a major long-term positive effect against SA Objective 1.

The site is surrounded by compatible land uses, and is located within 300m of Pittville Crescent, Pittville Circus, and Whaddon Road Public Green Spaces. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an

¹³² JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

¹³³ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

existing employment area with the potential for a major positive effect against SA Objective 2b. The site is located within 800m of some of the services and facilities identified within the Council's accessibility assessment¹³⁴, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this is considered unlikely. Potential for a residual minor negative effect against SA Objective 4.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is uncertainty regarding access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Highways Development Management comments¹³⁵ also identify that an assessment of the impact of loss of parking on site may be required. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, and at the project level, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. A small part of the site is located within an area of flood risk, however development could avoid this area of the site, and mitigation provided through the Local Plan and higher level JCS is considered sufficient to ensure that there will be no significant negative effects; potential for a residual neutral effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity¹³⁶, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use as a car park, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study¹³⁷, and it is not located within or adjacent to the AONB. The site is brownfield land within the urban area currently used as a car park. Development is considered to have the potential for a minor long-term positive effect on

¹³⁴ Gloucestershire County Council

¹³⁵ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

¹³⁶ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

¹³⁷ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

townscapes (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located adjacent to local non-designated heritage assets. Mitigation provided through the GCT JCS should ensure that development will not lead to any significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Taking account of the potential and available mitigation and the low capacity of the site, it is considered that there is the potential for a residual neutral effect against SA Objective 12.

Park

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP061: Land at Lansdown Rd (Gloucestershire Constabulary HQ)	++	++	+	+	- ?	++	+	-- ?	-- ?	-	+	+ ?	+	+	-	?	++
<p>Summary: The Council Sites Assessment has identified that site CP061 has the capacity to accommodate 90 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 1.28 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.</p> <p>The site is surrounded by compatible land uses, and is located within 300m of Hatherley Court, and Hatherley Park. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 800m of an existing employment area with the potential for a minor positive effect against SA Objective 2b. The site is located within 800m of some of the services and facilities identified within the Council's accessibility assessment¹³⁸, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this may be possible. Potential for a residual minor negative effect against SA Objective 4 with an element of uncertainty until project level details arise.</p> <p>The site is located within 400m of a bus stop and within 800m of Cheltenham Spa train station. Given the accessibility of the site to public transport modes it is considered that there is the potential to reduce reliance on the private vehicle with the potential for a major positive effect against SA Objective 5a. The site is also located within 400m of a Sustrans National Cycle Route with the potential for a minor long-term positive effect against SA Objective 5b. Development at this site that improves access to PRoWs can significantly enhance the identified positive effects.</p> <p>There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A40). Development is likely to exacerbate air quality issues in this area also. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.</p> <p>The site partially overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.</p>																	

¹³⁸ Gloucestershire County Council

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of a Deciduous Woodland Priority Habitat. Brownfield land is considered to have the potential to support a large amount of biodiversity¹³⁹, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use, it is considered that there are potential opportunities to enhance biodiversity on site, which could further support the existing priority habitats. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study¹⁴⁰, and it is not located within or adjacent to the AONB. The site is brownfield land within the urban area containing the Gloucestershire Constabulary headquarters. It is considered that there is the potential for a minor long-term positive effect on townscapes (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site contains a local non-designated heritage asset (Wilton House) and is adjacent to Listed Buildings. The site is also located within the Central Conservation Area. It is assumed that development can retain the local heritage asset on site, and mitigation provided through the GCT JCS should ensure sensitive and responsive development that respects the historic townscape, and that development will not lead to any significant negative effects on designated heritage. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Despite this, given that the site is located within the Conservation it is considered that there is the potential for minor residual negative effect against SA Objective 12.

Site Option	SA Objective														14		
	1	2	3	4	5	6	7	8	9	10	11	12	13				
CP062: Commercial St Car Park	+	+	++	+	+	+	+	0?	0?	-	+	+	+	+	0	?	++

Summary:

The Council Sites Assessment has identified that site CP062 has the capacity to accommodate 8 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.08 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Public Open Space, including Bath Road Public Greenspace. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is also located within 800m of most of the services and facilities

¹³⁹ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

¹⁴⁰ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

identified within the Council's accessibility assessment¹⁴¹. Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to educational facilities, a children centre and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Development Management comments¹⁴² further identify that the loss of parking on site may need consideration. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, and available at the project level, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity¹⁴³, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use as a car park, it is considered that there are potential opportunities to enhance biodiversity on site. As such there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study¹⁴⁴, and it is not located within or adjacent to the AONB. The site is brownfield land within the urban area currently used as a car park. Development is considered to have the potential for a minor long-term positive effect on townscapes (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

¹⁴¹ Gloucestershire County Council

¹⁴² Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

¹⁴³ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

¹⁴⁴ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The site is located within the Central Conservation Area and adjacent to the Grade II Listed Old School Court. Mitigation provided through the GCT JCS should ensure sensitive and responsive design that respects the historic townscape and that development will not lead to any significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Taking account of the potential and available mitigation, and the low capacity of the site, it is considered that there is the potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
CP092: Park Campus	++	++	++	+	- ?	+	+	- ?	- ?	-	+	+	+	-	-	?	+	-

Summary:

The site has not been assessed through the SALA, however the Council Sites Assessment has identified that site CP092 has the capacity to accommodate 300 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 11.92 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Hatherley Park. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is located within 800m of some of the services and facilities identified within the Council's accessibility assessment¹⁴⁵, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this may be possible. Potential for a residual minor negative effect against SA Objective 4 with an element of uncertainty until project level details arise.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is no satisfactory access to the site, and development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Development Management comments¹⁴⁶ further identify that there are potential capacity issues at Moorend Park Road, Norwood roundabout and Lansdown Road / Texaco. Although mitigation is provided through the GCT JCS and Cheltenham

¹⁴⁵ Gloucestershire County Council

¹⁴⁶ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

Local Plan, given the higher capacity of the site, it is considered that there is the potential for residual minor negative effects against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The site partially overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site contains an area of Deciduous Woodland Priority Habitat that extends east of the site. The Cheltenham Local Plan can, through appropriate policy wording; ensure that development retains the existing Priority Habitat on site, and support habitat enhancement on site. As such, it is considered that there is the potential for a minor positive effect against SA Objective 10 with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study¹⁴⁷, and it is not located within or adjacent to the AONB. The site is a mixture of greenfield and brownfield land (in a near even split) within the urban area. There is the potential for minor long-term positive effects on landscapes / townscapes through the regeneration of brownfield land, and also the potential for minor long-term negative effects through development in previously undeveloped areas. Overall it considered that there is the potential for both minor positive and minor negative effects against SA Objective 11a and SA Objective 14. The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11

The site contains numerous Listed Buildings and a local non-designated heritage asset. It is also located within the Central Conservation Area. It is assumed that development at the site could retain the designated and non-designated heritage assets on site. Mitigation provided through the GC JCS should ensure sensitive and responsive design that respects the historic townscape, and that development will not lead to any significant negative effects. However, given the capacity of the site to accommodate 300 dwellings, it is considered that there is the potential for a residual minor long-term negative effect against SA Objective 12 as development is likely to alter the setting of these assets.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP097: Bath Terrace Car Park	+	+	++	+	+	+	+	- ?	0 ?	-	+	+ ?	+	+	0	?	++

Summary:

The Council Sites Assessment has identified that site CP097 has the capacity to accommodate 13 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.36 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

¹⁴⁷ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The site is surrounded by compatible land uses, and is located within 300m of existing Public Open Space, including Bath Road Public Greenspace. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is also located within 800m of most of the services and facilities identified within the Council's accessibility assessment¹⁴⁸. Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to secondary education, a children centre and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

Development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Development Management comments¹⁴⁹ further identify that the loss of parking on site may need consideration. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 7, with an element of uncertainty until lower level assessments have been completed, however given that the site has no satisfactory access, it is considered that there is still the potential for a minor negative effect against SA Objective 6 with an element of uncertainty until lower level assessments have been completed.

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity¹⁵⁰, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use as a car park, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

¹⁴⁸ Gloucestershire County Council

¹⁴⁹ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze

<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

¹⁵⁰ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

The site was not assessed in the GCT JCS Landscape Sensitivity Study¹⁵¹, and it is not located within or adjacent to the AONB. The site is brownfield land within the urban area currently used as a car park. Development is considered to have the potential for a minor long-term positive effect on townscapes (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located adjacent to two local non-designated heritage assets; The Old Mission Hall and 5 Upper Bath Street. It is also located within the Central Conservation Area. Mitigation provided through the GCT JCS should ensure sensitive and responsive design that respects the historic townscape, and that development will not lead to any significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Taking account of the potential and available mitigation and the capacity of the site, it is considered that there is the potential for a residual neutral effect against SA Objective 12.

¹⁵¹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

Pittville

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP066: Ellerslie Care Home, Albert Rd	++	+	++	+	-	+	+	- ?	- ?	0	+	+	+	+	0	?	++

Summary:

The Council Sites Assessment has identified that site CP066 has the capacity to accommodate 14 new dwellings within the early stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 0.6 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located adjacent to Pittville Park. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is located within 800m of some of the services and facilities identified within the Council's accessibility assessment¹⁵², however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this is considered unlikely. Potential for a residual minor negative effect against SA Objective 4.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A435). Development is likely to exacerbate air quality issues in this area also. However, given the lower capacity of the site, and mitigation provided through the GCT JCS and Cheltenham Local Plan, it is considered that there is the potential for a residual minor negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of a Wood-pasture and Parkland Priority Habitat. Brownfield land is considered to have the potential to support a large amount of biodiversity¹⁵³, and the Cheltenham Local Plan can support

¹⁵² Gloucestershire County Council

¹⁵³ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Development can enhance supporting habitats on site, and provide appropriate contributions towards the positive management of the Priority Habitat as an urban park. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study¹⁵⁴, and it is not located within or adjacent to the AONB. The site is brownfield land within the urban area previously used as a Care Home (Ellerslie House). Development is considered to have the potential for a minor long-term positive effect on townscapes (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site contains a local non-designated heritage asset (Ellerslie House) and it is assumed that this would be retained on site in development. The site is located within the Central Conservation Area and adjacent to Pittville Park Registered Park and Garden. Mitigation provided through the GCT JCS should ensure sensitive and responsive design that respects the historic townscape, and that development will not lead to any significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Taking account of the potential and available mitigation and the low capacity of the site it is considered that there is the potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP067: Prestbury Rd / Windsor St 1	+	+	++	+	-	+	+	0?	0?	-	--	+	++	+	0	?	++

Summary:

The Council Sites Assessment has identified that site CP067 has the capacity to accommodate 29 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.7 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Pittville Park, Pittville Crescent and Whaddon Road Public Green Spaces. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is located within 800m of some of the services and facilities identified within the Council's accessibility assessment¹⁵⁵, however unless development provides significant contributions to new or improved

¹⁵⁴ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

¹⁵⁵ Gloucestershire County Council

provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this is considered unlikely. Potential for a residual minor negative effect against SA Objective 4.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. It should be noted that a culvert also runs through the site, and development may need to mitigate any potential effects on water arising from disturbance to this area. The site lies wholly within Flood Risk Zone 2, mitigation is likely to be difficult and/or expensive; it is therefore considered at this stage that there is the potential for a major long-term negative effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity¹⁵⁶, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current uses, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study¹⁵⁷, and it is not located within or adjacent to the AONB. The site is brownfield land within the urban area currently used for employment/commercial purposes. Given the nature of buildings on site (which look industrial) and its current use, development is considered to have the potential for a major long-term positive effect on townscapes (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located adjacent to a local non-designated heritage asset (Fox and Hounds). Mitigation provided through the GCT JCS should ensure that development will not lead to any significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local

¹⁵⁶ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

¹⁵⁷ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Taking into account the potential and available mitigation, and the low capacity of the site, it is considered that there is the potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP068: Prestbury Rd / Windsor St 2	+	+	++	+	-	+	+	0?	0?	-	--	+?	+	+	0	?	++

Summary:

The Council Sites Assessment has identified that site CP068 has the capacity to accommodate 7 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.16 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Pittville Crescent and Whaddon Road Public Green Spaces. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is located within 800m of some of the services and facilities identified within the Council's accessibility assessment¹⁵⁸, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this is considered unlikely. Potential for a residual minor negative effect against SA Objective 4.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site lies wholly within Flood Risk Zone 2, mitigation is likely to be difficult and/or expensive; it is therefore considered at this stage that there is the potential for a major long-term negative effect against SA Objective 9.

¹⁵⁸ Gloucestershire County Council

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity¹⁵⁹, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use as a garage, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study¹⁶⁰, and it is not located within or adjacent to the AONB. The site is brownfield land within the urban area currently used as a motor garage. Given its current use, development is considered to have the potential for a minor long-term positive effect on townscapes (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located adjacent to a Grade II Listed Building (74 Prestbury Road). Mitigation provided through the GCT JCS should ensure that development will not lead to any significant negative effects. Taking account of the available mitigation, and low capacity of the site, it is considered that there is the potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP088: Pittville School, New Barn Lane	++	0	++	+	-- ?	+	+	-- ?	-- ?	-	+	+	-	+	0	?	1

Summary:

The Council Sites Assessment has identified that site CP088 has the capacity to accommodate 56 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1.

The site is surrounded by compatible land uses, and is located adjacent to Starvehall Farm Greenspace. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. However, the site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment¹⁶¹, and development may increase reliance on the private vehicle in this respect. Potential for a major negative effect against SA Objective 4. Given the capacity of the site there is the potential for development to enhance service and facility provisions in this

¹⁵⁹ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

¹⁶⁰ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

¹⁶¹ Gloucestershire County Council

area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance accessibility at this site.

There is uncertainty regarding access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A435). Development is likely to exacerbate air quality issues in this area also. Highways Development Management comments¹⁶² further identify that modelling of the local network may be required. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site partially overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. The Cheltenham Local Plan can support the enhancement of features, through appropriate policy wording. It is considered that there are potential opportunities to enhance biodiversity on site, and as such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study¹⁶³, and it is not located within or adjacent to the AONB. The site is entirely greenfield land providing sports playing fields to Pittville School. It is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site lies adjacent to the Central Conservation Area. Mitigation provided through the GCT JCS should ensure sensitive and responsive design that respects the historic townscape. Taking account of the available mitigation and capacity of the site, it is considered that there is the potential for a residual neutral effect against SA Objective 12.

¹⁶² Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

¹⁶³ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP089: Pittville Campus	++	+	++	+	- ?	+	+	-- ?	-- ?	-	+	+ ?	+	+	0	?	++

Summary:

The Council Sites Assessment has identified that site CP089 has the capacity to accommodate 71 new dwellings within the early stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 0.31 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Pittville Park. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is located within 800m of some of the services and facilities identified within the Council's accessibility assessment¹⁶⁴, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this may be possible. Potential for a residual minor negative effect against SA Objective 4 with an element of uncertainty until project level details arise.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is uncertainty regarding access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A435). Development is likely to exacerbate air quality issues in this area also. Highways Development Management comments¹⁶⁵ further identify that modelling of the local network may be required. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site partially overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

¹⁶⁴ Gloucestershire County Council

¹⁶⁵ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity¹⁶⁶, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study¹⁶⁷, and it is not located within or adjacent to the AONB. The site is brownfield land within the urban area, previously used for educational purposes. Development is considered to have the potential for a minor long-term positive effect on townscapes (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site lies adjacent to the Central Conservation Area along the southern boundary, and is located in close proximity to the Grade I Listed Pittville Pump Rooms. Mitigation provided through the GCT JCS and Local Plan, and available at the project level, should ensure sensitive and responsive design that respects the historic townscape. Taking account of the available mitigation and capacity of the site, it is considered that there is the potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP090: Land adjacent to Ellerslie, Albert Rd	++	0	++	+	-	+	+	-?	-?	0	+	+	-	+	0	?	-

Summary:

The Council Sites Assessment has identified that site CP090 has the capacity to accommodate 11 new dwellings within the early stages of the plan period with the potential for a major long-term positive effect against SA Objective 1.

The site is surrounded by compatible land uses, and is located adjacent to Pittville Park. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is located within 800m of some of the services and facilities identified within the Council's accessibility assessment¹⁶⁸,

¹⁶⁶ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

¹⁶⁷ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

¹⁶⁸ Gloucestershire County Council

however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this is considered unlikely. Potential for a residual minor negative effect against SA Objective 4.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is uncertainty regarding access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A435). Development is likely to exacerbate air quality issues in this area also. However, given the lower capacity of the site, and mitigation provided through the GCT JCS and Cheltenham Local Plan, it is considered that there is the potential for a residual minor negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of a Wood-pasture and Parkland Priority Habitat. The site is greenfield land and as such would require appropriate site level assessment to ensure that development provides the necessary mitigation for any supporting habitats on site. Development could also provide contributions towards the positive management of the Priority Habitat as an urban park. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study¹⁶⁹, and it is not located within or adjacent to the AONB. The site is entirely greenfield land and located within the urban area. It is considered however that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site lies within the Central Conservation Area, adjacent to Pittville Park Registered Park and Garden and the local non-designated heritage asset Ellerslie House. Mitigation provided through the GCT JCS should ensure sensitive and responsive design that respects the historic townscape, and that development will not lead to any significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Taking

¹⁶⁹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

account of the potential and available mitigation and the low capacity of the site, it is considered that there is the potential for a residual neutral effect against SA Objective 12.

Prestbury

Site Option	SA Objective																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
CP009: Hunting Butts Farm, east of railway cutting	++	++	++	-	-- ?	+	+	-- ?	-- ?	0	+	+ ?	+ -	--	0	?	+	-

Summary:

The Council Sites Assessment has identified that site CP009 has the capacity to accommodate 95 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 5.01 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, however it is not located within 300m of existing public open space. As such, it is considered that there is the potential for a minor negative effect against SA Objective 3. Given the size of the site it is also unlikely that new open space could be provided with development to mitigate the identified negative effect. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. However, the site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment¹⁷⁰, and development may increase reliance on the private vehicle in this respect. Potential for a major negative effect against SA Objective 4. Given the capacity of the site however, there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

The site has poor access, and development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A435). Development is likely to exacerbate air quality issues in this area also. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

¹⁷⁰ Gloucestershire County Council

The site does not contain any designated (or non-designated) biodiversity, however it is located adjacent to Deciduous Woodland Priority Habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity¹⁷¹, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study¹⁷² as of medium to low landscape sensitivity. The site is a mixture of greenfield and brownfield land in a roughly 50/50 split. Regeneration at the site is considered to have the potential for a minor positive effect on landscapes, however it is also considered that there is the potential for a minor long-term negative effect on landscapes through development in previously undeveloped areas. It should also be noted that the Council's Sites Assessment has identified that the ridgeline on site is of significant importance. Overall it is considered that there is the potential for both minor positive and minor negative effects against SA Objective 11a and SA Objective 14. The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective														14		
	1	2	3	4	5	6	7	8	9	10	11	12	13				
CP010: Land south of Hunting Butts Farm, Swindon Lane	++	++	++	+	-- ?	+	+	-- ?	-- ?	0	+	+	-	--	0	?	1

Summary:

The Council Sites Assessment has identified that site CP010 has the capacity to accommodate 177 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 9.35 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Pittville Park. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. However, the site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment¹⁷³, and development may increase reliance on the private vehicle. Potential for a major negative effect against SA Objective 4. Given

¹⁷¹ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

¹⁷² GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

¹⁷³ Gloucestershire County Council

the capacity of the site there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A435). Development is likely to exacerbate air quality issues in this area also. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located adjacent to a Deciduous Woodland Priority Habitat. The site is relatively large expanse of greenfield land; policy mitigation provided through the Cheltenham Local Plan can ensure the appropriate assessment of biodiversity value on site, and any necessary mitigation for supporting habitats particularly around the woodland Priority Habitat. Local policies can also seek to enhance biodiversity features and habitats on site with the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study¹⁷⁴ as of medium to low landscape sensitivity. The site is entirely greenfield land and as such it is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. It should also be noted that the Council's Sites Assessment has identified that the ridgeline on site is of significant importance. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

¹⁷⁴ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP011: The Paddocks, Swindon Lane	+	++	++	+	--	+	+	-- ?	-- ?	0	+	+ ?	-	--	0	?	-

Summary:

The Council Sites Assessment has identified that site CP011 has the capacity to accommodate 34 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 1.79 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of St Nicholas Drive Open Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. However, the site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment¹⁷⁵, and development may increase reliance on the private vehicle in this respect. Potential for a major negative effect against SA Objective 4. Given the capacity of the site, development is unlikely to deliver any significant improvements to provisions in this area.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of PRoWs with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A435). Development is likely to exacerbate air quality issues in this area also. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. The Cheltenham Local Plan can support the enhancement of any existing features on site, through appropriate policy wording. It is considered that there are therefore potential opportunities to enhance biodiversity on site, and as such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

¹⁷⁵ Gloucestershire County Council

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study¹⁷⁶ as of medium to low landscape sensitivity. The site contains some brownfield land (residential unit), however it is predominantly greenfield land. It is therefore considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. As the site is predominantly greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP012: Land at Hunting Butts (east), Evesham Rd	++	++	++	-	-- ?	+	+	-- ?	-- ?	0	+	+	-	--	0	?	-

Summary:

The Council Sites Assessment has identified that site CP012 has the capacity to accommodate 220 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 11.64 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, however it is not located within 300m of existing public open space. As such, it is considered that there is the potential for a minor negative effect against SA Objective 3. Given the size of the site however there is the potential for new open space to be provided as part of development which could mitigate the identified effects. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. However, the site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment¹⁷⁷, and development may increase reliance on the private vehicle. Potential for a major negative effect against SA Objective 4. Given the capacity of the site there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

¹⁷⁶ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

¹⁷⁷ Gloucestershire County Council

There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A435). Development is likely to exacerbate air quality issues in this area also. Highways Development Management comments¹⁷⁸ further identify that modelling may be required at the racecourse roundabout. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located adjacent to a Deciduous Woodland Priority Habitat in the north west corner. The site is relatively large expanse of greenfield land; policy mitigation provided through the Cheltenham Local Plan can ensure the appropriate assessment of biodiversity value on site, and any necessary mitigation for supporting habitats particularly around the woodland Priority Habitat. Local policies can also seek to enhance biodiversity features and habitats on site with the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study¹⁷⁹ as of medium to low landscape sensitivity. The site is predominantly greenfield land although it does contain roads and is used as an overflow carpark for the Racecourse. It is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a largely undeveloped area. As the site is predominantly greenfield land it is also considered to have the potential for a minor negative effect on land and sc (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP013: Cheltenham Racecourse (north)	0	++	++	-	-- ?	+	+	-- ?	-- ?	0	0	+ ?	+	--	0	?	++
Summary:																	

¹⁷⁸ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

¹⁷⁹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The Council Sites Assessment has identified that site CP013 has the capacity to accommodate 22.9 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, however it is not located within 300m of existing public open space. As such, it is considered that there is the potential for a minor negative effect against SA Objective 3. Given the size of the site however there is the potential to provide new open space as part of development which could mitigate the identified effects.

The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. However, the site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment¹⁸⁰, and development may increase reliance on the private vehicle in this respect. Potential for a major negative effect against SA Objective 4. Given the capacity of the site there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A435). Development is likely to exacerbate air quality issues in this area also. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The north east border of the site is located within an area of flood risk, however development could avoid this area of the site, and mitigation provided through the Local Plan and higher level JCS is considered sufficient to ensure that there will be no significant negative effects; potential for a residual neutral effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of a Deciduous Woodland Priority Habitat in the north east. Brownfield land is considered to have the potential to support a large amount of biodiversity¹⁸¹, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

¹⁸⁰ Gloucestershire County Council

¹⁸¹ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study¹⁸² as of low landscape sensitivity. The site is previously developed land containing a variety of buildings (including Grandstands, Centaur, livery stables and accommodation) and car parking, development could regenerate this area with the potential for a minor positive effect on landscapes (SA Objective 11a). As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP014: Cheltenham Racecourse (south)	++	++	++	+	- ?	+	+	-- ?	-- ?	0	+	+ ?	+	--	0	?	++

Summary:

The Council Sites Assessment has identified that site CP014 has the capacity to accommodate 116 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 6.13 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of existing public open space, including Starvehall Farm Greenspace and Apple Orchard Open Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is located within 800m of one of the services and facilities identified within the Council's accessibility assessment¹⁸³, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this may be possible. Potential for a residual minor negative effect against SA Objective 4 with an element of uncertainty until project level details arise.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

¹⁸² GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

¹⁸³ Gloucestershire County Council

There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A435). Development is likely to exacerbate air quality issues in this area also. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of a Traditional Orchard Priority Habitat in the east. Brownfield land is considered to have the potential to support a large amount of biodiversity¹⁸⁴, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study¹⁸⁵, and it is not located within or adjacent to the AONB. The site is brownfield land located between the existing residential area and the Racecourse, and is predominantly used for parking. Development is considered to have the potential for a minor long-term positive effect on the landscape (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP015: Land off New Barn Lane 1 (south of Racecourse)	+	0	++	+	--	+	+	- ?	- ?	0	+	-	-	--	0	?	-
Summary:																	
The Council Sites Assessment has identified that site CP015 has the capacity to accommodate 35 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1.																	

¹⁸⁴ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

¹⁸⁵ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The site is surrounded by compatible land uses, and is located within 300m of existing public open space, including Starvehall Farm Greenspace and Apple Orchard Open Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. However, the site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment¹⁸⁶, and development may increase reliance on the private vehicle in this respect. Potential for a major negative effect against SA Objective 4. Given the capacity of the site, development is unlikely to deliver any significant improvements to provisions in this area.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is no satisfactory access to the site, and development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A435). Development is likely to exacerbate air quality issues in this area also. Highways Development Management comments¹⁸⁷ further identify that visibility may be an issue. However, given the lower capacity of the site, and mitigation provided through the GCT JCS and Cheltenham Local Plan, and available at the project level, it is considered that there is the potential for a residual minor negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site contains a Traditional Orchard Priority Habitat. The Cheltenham Local Plan can, through appropriate policy wording; ensure that development retains the existing Priority Habitat on site, however this would significantly reduce the developable area of the site. As such it is considered that if development were to occur on site it is likely to result in at least the partial loss of a Priority Habitat with the potential for a minor negative effect against SA Objective 10. Should the site proceed as a preferred option for development then it is recommended that development proposals seek to provide offsite compensatory measures for any loss of Priority Habitat.

The site was not assessed in the GCT JCS Landscape Sensitivity Study¹⁸⁸, and is not located within or adjacent to the AONB. The site contains a small area of brownfield land (the land connecting the main part of the site to the B4075), however the majority of the site is greenfield land. As such it is

¹⁸⁶ Gloucestershire County Council

¹⁸⁷ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

¹⁸⁸ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. As the site is predominantly greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP016: Land off New Barn Lane 2 (south of Racecourse)	+	0	+	+	--	+	+	-?	-?	0	+	+?	-	--	0	?	-

Summary:

The Council Sites Assessment has identified that site CP016 has the capacity to accommodate 13 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1.

The site is surrounded by compatible land uses, and is located within 300m of existing public open space, including Starvehall Farm Greenspace and Apple Orchard Open Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 800m of an existing employment area with the potential for a minor positive effect against SA Objective 2b. However, the site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment¹⁸⁹, and development may increase reliance on the private vehicle in this respect. Potential for a major negative effect against SA Objective 4. Given the capacity of the site, development is unlikely to deliver any significant improvements to provisions in this area.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is no satisfactory access to the site, and development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A435). Development is likely to exacerbate air quality issues in this area also. Highways Development Management comments¹⁹⁰ further identify that visibility may be an issue. However, given the lower capacity of the site, and mitigation provided

¹⁸⁹ Gloucestershire County Council

¹⁹⁰ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

through the GCT JCS and Cheltenham Local Plan, it is considered that there is the potential for a residual minor negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located adjacent to a Traditional Orchard Priority Habitat in the west. The site is greenfield land; policy mitigation provided through the Cheltenham Local Plan can ensure the appropriate assessment of biodiversity value on site, and any necessary mitigation for supporting habitats. Local policies can also seek to enhance biodiversity features and habitats on site with the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study¹⁹¹, and it is not located within or adjacent to the AONB. The site is entirely greenfield land and as such it is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP017: Land off New Barn Lane 3 (south of Racecourse)	++	0	+	+	-- ?	+	+	-- ?	-- ?	0	+	+	-	--	0	?	-

Summary:

The Council Sites Assessment has identified that site CP017 has the capacity to accommodate 52 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1.

The site is surrounded by compatible land uses, and is located within 300m of existing public open space, including Starvehall Farm Greenspace and Apple Orchard Open Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 800m of an existing employment area with the potential for a minor positive effect against SA Objective 2b. However, the site is located

¹⁹¹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

beyond 800m to all of the services and facilities identified within the Council's accessibility assessment¹⁹², and development may increase reliance on the private vehicle in this respect. Potential for a major negative effect against SA Objective 4. Given the capacity of the site there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

The site has poor access, and development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A435). Development is likely to exacerbate air quality issues in this area also. Highways Development Management comments¹⁹³ further identify that visibility may be an issue. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of a Traditional Orchard Priority Habitat to the west. The site is greenfield land; policy mitigation provided through the Cheltenham Local Plan can ensure the appropriate assessment of biodiversity value on site, and any necessary mitigation for supporting habitats. Local policies can also seek to enhance biodiversity features and habitats on site with the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site was not assessed in the GCT JCS Landscape Sensitivity Study¹⁹⁴, and it is not located within or adjacent to the AONB. The site is entirely greenfield land and as such it is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

¹⁹² Gloucestershire County Council

¹⁹³ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

¹⁹⁴ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP018: Land east of Cheltenham Racecourse 1, Lake St	++	++	--	-	- ?	+	+	- ?	- ?	0	0	+ ?	--	--	-	?	-

Summary:

The Council Sites Assessment has identified that site CP018 has the capacity to accommodate 136 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 5.45 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of existing public open space, including Apple Orchard Open Space. Development at the site however could also result in the loss of informal open space. As such, it is considered that there is the potential for a minor negative effect against SA Objective 3. Development could retain and enhance the informal open space on site to mitigate the identified effects.

The site is not located within 800m of an existing employment area with the potential for a major negative effect against SA Objective 2b. However, this should be considered alongside the provision of employment on site, which can mitigate the negative effects to some degree. The site is located within 800m of one of the services and facilities identified within the Council's accessibility assessment¹⁹⁵, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this may be possible. Potential for a residual minor negative effect against SA Objective 4 with an element of uncertainty until project level details arise.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is no satisfactory access to the site, and development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Highways Development Management comments¹⁹⁶ further identify that constraints on Lake Street and the double mini roundabouts may restrict development to a small scale capacity. Although mitigation is provided through the GCT JCS and

¹⁹⁵ Gloucestershire County Council

¹⁹⁶ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

Cheltenham Local Plan, given the higher capacity of the site, it is considered that there is the potential for residual minor negative effects against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The south west corner of the site lies partially within an area of flood risk, however development could avoid this area of the site, and mitigation provided through the Local Plan and higher level JCS is considered sufficient to ensure that there will be no significant negative effects; potential for a residual neutral effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or Priority Habitats. The site is greenfield land; policy mitigation provided through the Cheltenham Local Plan can ensure the appropriate assessment of biodiversity value on site, and any necessary mitigation for identified features. Local policies can also seek to enhance biodiversity features and habitats on site with the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study¹⁹⁷ as of high-medium landscape sensitivity. The site is predominantly greenfield land and includes an area of informal open space. It is considered that there is the potential for a major long-term negative effect on landscapes (SA Objective 11a) through development in a sensitive landscape area and previously undeveloped area. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site is located adjacent to 3 Listed Buildings in the south east corner of the site, and in close proximity to the Moated Site Scheduled Monument (the north of the site). The site is also located within the Prestbury Conservation Area. Mitigation provided through the GCT JCS should ensure that development will not lead to any significant negative effects. Given the presence of the designated heritage assets and location of the site within a Conservation Area, it is considered that despite mitigation, there is still the potential for a residual minor negative effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP019: Land east of Cheltenham Racecourse 2, Park Lane	+	++	--	+	--	-	+	0?	0?	0	+	+?	--	--	0	?	-
Summary:																	

¹⁹⁷ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The Council Sites Assessment has identified that site CP019 has the capacity to accommodate 15 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 1.24 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of existing public open space, including Apple Orchard Open Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is not located within 800m of an existing employment area with the potential for a major negative effect against SA Objective 2b. However, this should be considered alongside the provision of employment on site, which can mitigate the negative effects to some degree. The site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment¹⁹⁸, and development may increase reliance on the private vehicle in this respect. Potential for a major negative effect against SA Objective 4. Given the capacity of the site, development is unlikely to deliver any significant improvements to provisions in this area.

The site is located within 800m of a bus stop and given this distance, development at the site is considered less likely to contribute to a reduced reliance on the private vehicle with the potential for a minor negative effect against SA Objective 5a. The site is however located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance accessibility at this site.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Highways Development Management comments¹⁹⁹ further identify that constraints on Lake Street and the double mini roundabouts may restrict development to a small scale capacity. Given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or Priority Habitats. The site is greenfield land; policy mitigation provided through the Cheltenham Local Plan can ensure the appropriate assessment of biodiversity value on site, and any necessary mitigation for identified features. Local policies can also seek to enhance biodiversity features and habitats on site with the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

¹⁹⁸ Gloucestershire County Council

¹⁹⁹ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study²⁰⁰ as of high-medium landscape sensitivity. The site is entirely greenfield land. It is considered that there is the potential for a major long-term negative effect on landscapes (SA Objective 11a) through development in a sensitive landscape area and previously undeveloped area. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site is located adjacent to the Moated Site Scheduled Monument. The site is considered to have a low capacity for housing, and mitigation provided through the GCT JCS should ensure that development will not lead to any significant negative effects. The Scheduled Monument has existing residential development along its southern edge, and as such it is considered that development at this site is unlikely to significantly alter its setting. It is considered therefore that there is the potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP020: Land north of Cheltenham Racecourse	++ ?	++ ?	--	-	-- ?	-	+	-- ?	-- ?	0	+	+	--	--	-	?	?

Summary:

The site is assessed as not suitable, available or achievable within the SALA, however the Council Sites Assessment has identified that site CP020 has the capacity to accommodate 362 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 19.15 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a. At this stage however to reflect the findings of the SALA there is an element of uncertainty.

The site is surrounded by compatible land uses, however it is not located within 300m of existing public open space. As such, it is considered that there is the potential for a minor negative effect against SA Objective 3. Given the size of the site however there is the potential to provide new open space as part of development which could mitigate the identified effects.

The site is not located within 800m of an existing employment area with the potential for a major negative effect against SA Objective 2b. However, this should be considered alongside the potential provision of employment on site, which can mitigate the negative effects to some degree. The site is also located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment²⁰¹, and development may increase reliance on the private vehicle in this respect. Potential for a major negative effect against SA Objective 4. Given the capacity of the site

²⁰⁰ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

²⁰¹ Gloucestershire County Council

there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.

The site is located within 800m of a bus stop and given this distance, development at the site is considered less likely to contribute to a reduced reliance on the private vehicle with the potential for a minor negative effect against SA Objective 5a. The site is however located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance accessibility at this site.

There is no satisfactory access to the site, and development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A435). Development is likely to exacerbate air quality issues in this area also. Highways Development Management comments²⁰² further identify that access through the racecourse is not desirable and there are no links to the public highway. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of Deciduous Woodland Priority Habitat in the west and north west. The site is greenfield land; policy mitigation provided through the Cheltenham Local Plan can ensure the appropriate assessment of biodiversity value on site, and any necessary mitigation for supporting habitats. Local policies can also seek to enhance biodiversity features and habitats on site with the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study²⁰³ as of medium and high-medium landscape sensitivity. The site is entirely greenfield land. It is considered that there is the potential for a major long-term negative effect on landscapes (SA Objective 11a) through development in a sensitive landscape area and previously undeveloped area. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site is located in close proximity to the Moated Site Scheduled Monument. Mitigation provided through the GCT JCS should ensure that development will not lead to any significant negative effects, however given the capacity of the site to accommodate 362 new dwellings, it is

²⁰² Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

²⁰³ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

considered that development will alter the northern setting of the Scheduled Monument, with the potential for a residual minor long-term negative effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP021: Land between Cheltenham Racecourse and B4632	++ ?	++ ?	--	-	-- ?	+	+	- ?	- ?	0	+	+ ?	--	--	-	?	-

Summary:

The site is assessed as not suitable, available or achievable within the SALA, however the Council Sites Assessment has identified that site CP021 has the capacity to accommodate 523 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 27.7 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a. At this stage however to reflect the findings of the SALA there is an element of uncertainty.

The site is surrounded by compatible land uses, however it is not located within 300m of existing public open space. As such, it is considered that there is the potential for a minor negative effect against SA Objective 3. Given the size of the site however there is the potential to provide new open space as part of development which could mitigate the identified effects. The site is not located within 800m of an existing employment area with the potential for a major negative effect against SA Objective 2b. However, this should be considered alongside the provision of employment on site, which can mitigate the negative effects to some degree. The site is also located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment²⁰⁴, and development may increase reliance on the private vehicle in this respect. Potential for a major negative effect against SA Objective 4. Given the capacity of the site there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Highways Development Management comments²⁰⁵ further identify that there is potential for issues at the High St / Noverton Lane junction and in accessing Spring Lane. Although mitigation is provided through the GCT JCS and Cheltenham Local Plan,

²⁰⁴ Gloucestershire County Council

²⁰⁵ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

given the higher capacity of the site, it is considered that there is the potential for residual minor negative effects against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or Priority Habitats. The site is predominantly greenfield land; policy mitigation provided through the Cheltenham Local Plan can ensure the appropriate assessment of biodiversity value on site, and any necessary mitigation for identified features. Local policies can also seek to enhance biodiversity features and habitats on site with the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study²⁰⁶ as of high-medium landscape sensitivity. Though the site does contain a few residential units, it is predominantly greenfield land. It is considered that there is the potential for a major long-term negative effect on landscapes (SA Objective 11a) through development in a sensitive landscape area and previously undeveloped area. As the site is predominantly greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site is located adjacent to the Moated Site Scheduled Monument. Mitigation provided through the GCT JCS should ensure that development will not lead to any significant negative effects, however given the capacity of the site to accommodate 523 new dwellings, it is considered that development will alter the northern setting of the Scheduled Monument, with the potential for a residual minor long-term negative effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP022: Land at Prestbury	++	0	--	+	-- ?	+	+	- ?	- ?	-	0	+	--	--	-	?	-
Summary:																	
The Council Sites Assessment has identified that site CP022 has the capacity to accommodate 200 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1.																	

²⁰⁶ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The site is surrounded by compatible land uses, and is located within 300m of Ann Goodrich Close Amenity Greenspace. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is not located within 800m of an existing employment area with the potential for a major negative effect against SA Objective 2b. The site is also located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment²⁰⁷, and development may increase reliance on the private vehicle in this respect. Potential for a major negative effect against SA Objective 4. Given the capacity of the site there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Highways Development Management comments²⁰⁸ further identify that there is potential for issues at the High St / Noverton Lane junction and in accessing Spring Lane. Although mitigation is provided through the GCT JCS and Cheltenham Local Plan, given the higher capacity of the site, it is considered that there is the potential for residual minor negative effects against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The site partially overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The southern boundary of the site lies partially within an area of flood risk, however development could avoid this area of the site, and mitigation provided through the Local Plan and higher level JCS is considered sufficient to ensure that there will be no significant negative effects; potential for a residual neutral effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or Priority Habitats. The site is predominantly greenfield land; policy mitigation provided through the Cheltenham Local Plan can ensure the appropriate assessment of biodiversity value on site, and any necessary mitigation for identified features. Local policies can also seek to enhance biodiversity features and habitats on site with the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

²⁰⁷ Gloucestershire County Council

²⁰⁸ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

The site was not assessed in the GCT JCS Landscape Sensitivity Study²⁰⁹, however the Council's Sites Assessment has identified that part of the site is prominent from escarpment and the site is an important setting to the AONB. The site is predominantly greenfield land and it is considered that there is the potential for a major long-term negative effect on landscapes (SA Objective 11a) through development in a sensitive landscape area and largely previously undeveloped area. As the site is predominantly greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site contains The Hayes; a Grade II Listed Building and is located adjacent to another Listed Buildings and local non-designated heritage assets. The site is also located within the Prestbury Conservation Area. It is assumed that any development proposal will retain the Listed Building on site. Mitigation provided through the GCT JCS should ensure that development will not lead to any significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Given the presence of the designated heritage assets and the location of the site within the Conservation Area, it is considered that development has the potential for a residual minor negative effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP099: Land at Swindon Lane (adjacent to dismantled line)	+	++	+	+	-	+	+	-- ?	-- ?	0	+	+	-	--	0	?	

Summary:

The Council Sites Assessment has identified that site CP099 has the capacity to accommodate 35 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 1.06 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Pittville Park. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 800m of an existing employment area with the potential for a minor positive effect against SA Objective 2b. The site is located within 800m of one of the services and facilities identified within the Council's accessibility assessment²¹⁰, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this is considered unlikely. Potential for a residual minor negative effect against SA Objective 4.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

²⁰⁹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

²¹⁰ Gloucestershire County Council

There is uncertainty regarding access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A435). Development is likely to exacerbate air quality issues in this area also. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or Priority Habitats. The site is greenfield land; policy mitigation provided through the Cheltenham Local Plan can ensure the appropriate assessment of biodiversity value on site, and any necessary mitigation for identified features. Local policies can also seek to enhance biodiversity features and habitats on site with the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study²¹¹ as of medium to low landscape sensitivity. The site is entirely greenfield land and as such it is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

²¹¹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

Springbank

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP034: Arle Nursery and allotments, Old Gloucester Rd	++	++	++	+	- ?	+	+	-- ?	-- ?	-	-	+ ?	-	--	-	?	-

Summary:

The Council Sites Assessment has identified that site CP034 has the capacity to accommodate 8.2 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Pilgrove Way Public Green Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is located within 800m of some of the services and facilities identified within the Council's accessibility assessment²¹², however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this may be possible. Potential for a residual minor negative effect against SA Objective 4 with an element of uncertainty until project level details arise.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the B4063 and B4634). Development is likely to exacerbate air quality issues in this area also. Highways Development Management comments²¹³ further identify that modelling may be required at Tewkesbury Road and Staverton cross roads. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The whole site overlies a minor aquifer of intermediate vulnerability; development therefore has the potential for a minor negative effect against SA objective 8. The majority of the site also lies within a flood risk area and mitigation is likely to be difficult and/or expensive; development therefore is considered to have the potential for a minor long-term negative effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of Deciduous Woodland and Traditional Orchard Priority Habitats in the north. The site is predominantly greenfield land; policy mitigation provided through the Cheltenham Local Plan can

²¹² Gloucestershire County Council

²¹³ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

ensure the appropriate assessment of biodiversity value on site, and any necessary mitigation for supporting habitats. Local policies can also seek to enhance biodiversity features and habitats on site with the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study²¹⁴ as of medium-low landscape sensitivity. The site contains areas of brownfield land (including roads running through allotments, and a plant nursery), however it is predominantly greenfield land (including allotments). It is considered therefore that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a largely undeveloped area. As the site is predominantly greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site is located adjacent to the Moat House moated site Scheduled Monument and two Listed Buildings. Mitigation provided through the GCT JCS should ensure that development would not lead to any significant negative effects. However, the site is situated on the Cheltenham administrative boundary and the Scheduled Monument is located within the neighbouring Tewkesbury Borough and in a rural setting. Given the capacity of the site it is considered that there is the potential for a residual minor long-term cross-boundary negative effect against SA Objective 12 as development is likely to alter the setting of the designated heritage assets.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP035: Land at Old Gloucester Rd	++	++	+	+	- ?	-	+	-- ?	-- ?	-	0	+ ?	-	--	-	?	-

Summary:

The Council Sites Assessment has identified that site CP035 has the capacity to accommodate 59 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 3.12 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Pilgrove Way Public Green Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 800m of an existing employment area with the potential for a minor positive effect against SA Objective 2b. The site is located within 800m of one of the services and facilities identified within the Council's accessibility assessment²¹⁵, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this may be possible. Potential for a residual minor negative effect against SA Objective 4 with an element of uncertainty until project level details arise.

²¹⁴ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

²¹⁵ Gloucestershire County Council

The site is located within 800m of a bus stop and given this distance, development at the site is considered less likely to contribute to a reduced reliance on the private vehicle with the potential for a minor negative effect against SA Objective 5a. The site is however located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance accessibility at this site.

There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the B4063 and B4634). Development is likely to exacerbate air quality issues in this area also. Highways Development Management comments²¹⁶ further identify that modelling may be required at Tewkesbury Road and Staverton cross roads. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site lies partially over / adjacent to a minor aquifer of intermediate vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The north east section of the site lies within an area of flood risk, however development could avoid this section of the site, and mitigation provided through the Local Plan and higher level JCS is considered sufficient to ensure that there will be no significant negative effects; potential for a residual neutral effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or Priority Habitats. The site is greenfield land; policy mitigation provided through the Cheltenham Local Plan can ensure the appropriate assessment of biodiversity value on site, and any necessary mitigation for identified features. Local policies can also seek to enhance biodiversity features and habitats on site with the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessment have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study²¹⁷ as of medium to medium-low landscape sensitivity. The site is entirely greenfield land and as such it is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site is located in close proximity to the Moat House moated site Scheduled Monument and two Listed Buildings. Mitigation provided through the GCT JCS should ensure that development would not lead to any significant negative effects. However, the site is situated on the Cheltenham administrative boundary and the Scheduled Monument is located within the neighbouring Tewkesbury Borough and in a rural setting. It is considered

²¹⁶ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

²¹⁷ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

that there is the potential for a residual minor long-term cross-boundary negative effect against SA Objective 12 as development is likely to alter the setting of the designated heritage assets. However, it should be noted that given the capacity of this site, the effects are considered of less significance than those identified at site CP034.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP036: Land at Fiddler's Green, Fidler's Green Lane	++	++	++	-	- ?	+	+	-- ?	-- ?	-	0	+	-	+	0	?	-

Summary:

The Council Sites Assessment has identified that site CP036 has the capacity to accommodate 662 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 25 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

Although the site is located within 300m of Pilgrove Way, Henley Road, and Fiddlers Green Lane Public Green Spaces, it is also covered by a Cordon Sanitaire (identified in the existing Local Plan as a Development Exclusion Zone). Development at the site therefore has the potential for a minor negative effect against SA Objective 3.

The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is located within 800m of some of the services and facilities identified within the Council's accessibility assessment²¹⁸, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this may be possible. Potential for a residual minor negative effect against SA Objective 4 with an element of uncertainty until project level details arise.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

The site has poor access, and development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the M5, B4063 and B4634). Development is likely to exacerbate air quality issues in this area also. Highways Development Management comments²¹⁹ identify that there are capacity issues at Arle Court roundabout and the potential additional network congestion, modelling and links need consideration. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

²¹⁸ Gloucestershire County Council

²¹⁹ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

The northern section of the site lies partially over a minor aquifer of intermediate vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The north east corner of the site is located within an area of flood risk, however development could avoid this area of the site, and mitigation provided through the Local Plan and higher level JCS is considered sufficient to ensure that there will be no significant negative effects; potential for a residual neutral effect against SA Objective 9.

The site contains an area of Deciduous Woodland Priority Habitat, and is adjacent to a Lowland Meadow Priority Habitat in the south. The Cheltenham Local Plan can, through appropriate policy wording; ensure that development retains the existing Priority Habitat on site, support habitat enhancement on site, and support the creation of GI linkages with meadow habitats to the south of the site. As such, it is considered that there is the potential for a minor positive effect against SA Objective 10 with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study²²⁰ as of medium to medium-low landscape sensitivity. The site is a large tract of predominantly greenfield land (there are a few farmsteads on the site) that stretches through Springbank ward and into the adjoining Hester's Way ward. It is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. It should also be noted that given the size of this site, the potential minor negative effects are considered to be of greater significance than the potential minor negative effects found at the surrounding smaller greenfield sites. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. The Moat House moated site Schedule Monument is in close proximity to the site, however the B4634 creates a barrier between the two sites, and as such development is not considered likely to lead to any significant negative effects. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP052: Springbank Shopping Centre	+	+	++	+	+	+	+	- ?	- ?	-	+	+ ?	+	+	0	?	++

Summary:

The Council Sites Assessment has identified that site CP052 has the capacity to accommodate 38 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.51 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

²²⁰ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The site is surrounded by compatible land uses, and is located within 300m of Welch Road, and Pilgrove Way Public Green Spaces. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is also located within 800m of most of the services and facilities identified within the Council's accessibility assessment²²¹. Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to secondary and higher education, a children centre and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the B4063 and B4634). Development is likely to exacerbate air quality issues in this area also. However, given the lower capacity of the site, and mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered that there is the potential for a residual minor negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The whole site lies over a minor aquifer of intermediate vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or Priority Habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity²²², and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study²²³, and it is not located within or adjacent to the AONB. The site is brownfield land located within the urban area, and is currently a largely vacant Neighbourhood Shopping Centre. It is considered that there is the potential for a minor long-term positive effect on townscapes (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also

²²¹ Gloucestershire County Council

²²² JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

²²³ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP053: Land adjacent to former Goat and Bicycle Public House	+	+	+	+	+	+	--	- ?	- ?	0	+	+ ?	++	+	0	?	++

Summary:

The Council Sites Assessment has identified that site CP053 has the capacity to accommodate 18 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.43 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of the Land off Springbank Road and Henley Road Public Green Spaces. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 800m of an existing employment area with the potential for a minor positive effect against SA Objective 2b. The site is also located within 800m of most of the services and facilities identified within the Council's accessibility assessment²²⁴. Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to higher education and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is located beyond reasonable walking distance (400m) to either a PRoW or Sustrans National Cycle Route. Development at this site is therefore less likely to promote walking and cycling unless significant improvements to the PRoW and Cycle Network are made. Potential for a major negative effect against SA Objective 5b.

There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the B4063 and B4634). Development is likely to exacerbate air quality issues in this area also. However, given the lower capacity of the site, and mitigation provided through the GCT JCS and Cheltenham Local Plan, it is considered that there is the potential for a residual minor negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

²²⁴ Gloucestershire County Council

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity²²⁵, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites vacant nature, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study²²⁶, and it is not located within or adjacent to the AONB. The site is vacant brownfield land located within the urban area. It is considered that given the vacant nature of the site, there is the potential for a major positive effect on townscapes (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

²²⁵ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

²²⁶ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

St Marks

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP054: Land and buildings at Coronation Square	++	+	++	+	+	+	--	-- ?	-- ?	-	+	+ ?	+	+	0	?	++

Summary:

The Council Sites Assessment has identified that site CP054 has the capacity to accommodate 68 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 0.4 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located adjacent to Coronation Square, and within 300m of King George V Public Green Space, and Hesters Way Park. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is also located within 800m of most of the services and facilities identified within the Council's accessibility assessment²²⁷. Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to a children centre and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is however located beyond reasonable walking distance (400m) to either a PRoW or Sustrans Nation Cycle Route. Development at this site is therefore less likely to promote walking and cycling unless significant improvements to the PRoW and Cycle Network are made. Potential for a major negative effect against SA Objective 5b.

There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A40). Development is likely to exacerbate air quality issues in this area also. Highways Development Management comments²²⁸ further identify that the potential impact at PE Way / GCHQ will require further assessment. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

²²⁷ Gloucestershire County Council

²²⁸ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity²²⁹, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study²³⁰, and it is not located within or adjacent to the AONB. The site is brownfield land within the urban area containing retail facilities which the Council's Sites Assessment identifies as largely underused. It is considered that there is the potential for a minor long-term positive effect on landscapes (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective														14		
	1	2	3	4	5	6	7	8	9	10	11	12	13				
CP055: Community Centre & Scout Hut, Brooklyn Rd	+	+	+	+	+	+	--	- ?	- ?	-	+	+ ?	+	+	0	?	+

Summary:
The Council Sites Assessment has identified that site CP055 has the capacity to accommodate 28 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.9 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Coronation Square, and King George V Public Green Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 800m of an existing employment area with the potential for a minor positive effect against SA Objective 2b. The site is also located within 800m of most of the services and facilities

²²⁹ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

²³⁰ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

identified within the Council's accessibility assessment²³¹. Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to secondary education, a children centre and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is however located beyond reasonable walking distance (400m) to either a PRoW or Sustrans National Cycle Route. Development at this site is therefore less likely to promote walking and cycling unless significant improvements to the PRoW and Cycle Network are made. Potential for a major negative effect against SA Objective 5b.

There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A40). Development is likely to exacerbate air quality issues in this area also. However, given the lower capacity of the site, and mitigation provided through the GCT JCS and Cheltenham Local Plan, it is considered that there is the potential for a residual minor negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or Priority Habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity²³², and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study²³³, and it is not located within or adjacent to the AONB. The site is predominantly brownfield land in use as a community centre and scout hut, although it does contain an area of greenfield which has also been submitted for consideration as a Local Green Space. As the site is predominantly previously developed land, it is considered that there is the potential for a minor long-term positive effect on landscapes (SA Objective 11a) through regeneration of this land. As the site is predominantly brownfield land it is also considered to have the potential for a minor positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

²³¹ Gloucestershire County Council

²³² JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

²³³ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The site is located adjacent to The Poets Conservation Area. Mitigation provided through the GCT JCS should ensure sensitive and responsive design that respects the historic townscape, with the potential for a residual neutral effect against SA Objective 12. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP056: Rowanfield Exchange, Devon Avenue	++	+	++	+	-	+	--	0?	0?	-	+	+	+	+	0	?	++

Summary:

The Council Sites Assessment has identified that site CP056 has the capacity to accommodate 17 new dwellings within the early stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 0.37 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of King George V Public Green Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for major positive effect against SA Objective 2b. The site is located within 800m of some of the services and facilities identified within the Council's accessibility assessment²³⁴, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this is considered unlikely. Potential for a residual minor negative effect against SA Objective 4.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is however located beyond reasonable walking distance (400m) to either a PRoW or Sustrans National Cycle Route. Development at this site is therefore less likely to promote walking and cycling unless significant improvements to the PRoW and Cycle Network are made. Potential for a major negative effect against SA Objective 5b.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

²³⁴ Gloucestershire County Council

The site partially overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or Priority Habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity²³⁵, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study²³⁶, and it is not located within or adjacent to the AONB. The site is brownfield land consisting of a neighbourhood centre, residential and associated garages. It is considered that there is the potential for a minor long-term positive effect on landscapes (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP086: Former Monkscroft Primary School	+	++	++	+	+	+	+	-- ?	-- ?	-	+	+ ?	-	+	0	?	-

Summary:

The Council Sites Assessment has identified that site CP086 has the capacity to accommodate 30 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 1.8 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

²³⁵ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

²³⁶ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The site is surrounded by compatible land uses, and is located within 300m of Hesters Way Park, Coronation Square and King George V Public Green Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. It should be noted however that the local community has expressed interest to safeguard the site as a local green space. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is also located within 800m of most of the services and facilities identified within the Council's accessibility assessment²³⁷. Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to secondary education, a children centre and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a Sustrans National Cycle Route with the potential for a minor long-term positive effect against SA Objective 5b. Development at this site that improves access to PRowS can enhance the significance of these effects.

There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A40). Development is likely to exacerbate air quality issues in this area also. Highways Development Management comments²³⁸ further identify that capacity analysis may be required at PE Way. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The northern / north east section of the site partially overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of Deciduous Woodland Priority Habitat in the west. The site is predominantly greenfield land; policy mitigation provided through the Cheltenham Local Plan can ensure the appropriate assessment of biodiversity value on site, and any necessary mitigation for supporting habitats. Local policies can also seek to enhance biodiversity features and habitats on site with the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study²³⁹, and it is not located within or adjacent to the AONB. The site is predominantly greenfield land comprising of playing fields and the former Monkscroft Primary School. It should also be noted that the local community has expressed interest to safeguard the site as local green space. It is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a largely previously undeveloped area. As the site is predominantly greenfield land it is also considered to

²³⁷ Gloucestershire County Council

²³⁸ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

²³⁹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

have the potential for a minor negative effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located adjacent to The Poets Conservation Area. Mitigation provided through the GCT JCS should ensure sensitive and responsive design that respects the historic townscape, with the potential for a residual neutral effect against SA Objective 12. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP087: Land at Stone Crescent	+	0	+	+	-	+	--	0?	0?	0	+	+?	-	+	0	?	-

Summary:

The Council Sites Assessment has identified that site CP087 has the capacity to accommodate 20 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1.

The site is surrounded by compatible land uses, and is located adjacent to King George V Public Green Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 800m of an existing employment area with the potential for minor positive effect against SA Objective 2b. The site is located within 800m of some of the services and facilities identified within the Council's accessibility assessment²⁴⁰, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this is considered unlikely. Potential for a residual minor negative effect against SA Objective 4.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. However, the site is located beyond reasonable walking distance (400m) to either a PRoW or Sustrans National Cycle Route. Development at this site is therefore less likely to promote walking and cycling unless significant improvements to the PRoW and Cycle Network are made. Potential for a major negative effect against SA Objective 5b.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

²⁴⁰ Gloucestershire County Council

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain and is not located in close proximity to any designated (or non-designated) biodiversity, or Priority Habitats. The site is greenfield land; policy mitigation provided through the Cheltenham Local Plan can ensure the appropriate assessment of biodiversity value on site, and any necessary mitigation for supporting habitats. Local policies can also seek to enhance biodiversity features and habitats on site with the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study²⁴¹, and it is not located within or adjacent to the AONB. The site is entirely greenfield land. It is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

²⁴¹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

St Pauls

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP083: Henrietta St Car Park, St Margarets Rd	+	+	++	+	+	+	+	0?	0?	-	+	+	+	+	0	?	++

Summary:

The Council Sites Assessment has identified that site CP083 has the capacity to accommodate 24 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.2 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Clarence Square Public Green Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is also located within 800m of most of the services and facilities identified within the Council's accessibility assessment²⁴². Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to secondary education, a children centre and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Development Management comments²⁴³ further identify that the loss of parking on site may need consideration. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

²⁴² Gloucestershire County Council

²⁴³ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or Priority Habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity²⁴⁴, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study²⁴⁵, and it is not located within or adjacent to the AONB. The site is brownfield land currently used as a car park. It is considered that there is the potential for a minor long-term positive effect on landscapes (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located adjacent to three Grade II Listed Buildings, including the Henrietta Street building. It is also located within the Central Conservation Area. Mitigation provided through the GCT JCS should ensure sensitive and responsive design that respects the historic townscape, and that development will not lead to any significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Taking account of the potential and available mitigation and the capacity of the site, it is considered that there is the potential for a residual neutral effect against SA Objective 12.

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Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP084: 47 - 51 Swindon Rd	+	+	++	+	+	+	+	0?	0?	-	+	+?	+	+	0	?	++

Summary:
The Council Sites Assessment has identified that site CP084 has the capacity to accommodate 10 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.09 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Clarence Square Public Green Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is also located within 800m of most of the services and facilities identified within

²⁴⁴ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

²⁴⁵ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

the Council's accessibility assessment²⁴⁶. Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to secondary education, a children centre and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or Priority Habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity²⁴⁷, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessment have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study²⁴⁸, and it is not located within or adjacent to the AONB. The site is brownfield land within the urban area, currently used as a car workshop. It is considered that there is the potential for a minor long-term positive effect on landscapes (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located within the Central Conservation Area. Mitigation provided through the GCT JCS should ensure sensitive and responsive design that respects the historic townscape. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected

²⁴⁶ Gloucestershire County Council

²⁴⁷ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

²⁴⁸ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

according to its significance, and that appropriate site level assessments are carried out prior to development. Taking account of the potential and available mitigation and the low capacity of the site it is considered that there is the potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP091: Hardwick Site, St Pauls Rd	++ ?	++ ?	++	+	+	+	++	- ?	- ?	-	+	+	+	+	0	?	+

Summary:

The site has not been assessed through the SALA, however the Council Sites Assessment has identified that site CP091 has the capacity to accommodate 64 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 1.92 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a. At this stage however to reflect the findings of the SALA there is an element of uncertainty.

The site is surrounded by compatible land uses, and is located adjacent to Honeybourne Line Public Green Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. It should be noted however that the site has been submitted for consideration as a designated Local Green Space. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is also located within 800m of most of the services and facilities identified within the Council's accessibility assessment²⁴⁹. Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to secondary education and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of both PRoWs and a Sustrans National Cycle Route, and as such development has opportunities to promote these modes of transport with the potential for a major long-term positive effect against SA Objective 5b.

There is no satisfactory access to the site, and development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Although mitigation is provided through the GCT JCS and Cheltenham Local Plan, given the higher capacity of the site, it is considered that there is the potential for residual minor negative effects against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

²⁴⁹ Gloucestershire County Council

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or Priority Habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity²⁵⁰, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study²⁵¹, and it is not located within or adjacent to the AONB. The site is predominantly brownfield land within the urban area, however it also contains sports pitches which have been submitted for consideration as Local Green Space. Given the nature of the site there is the potential for minor long-term positive effects through the regeneration of land on site, and also the potential for minor negative effect effects through development in previously undeveloped areas. Overall, given that the majority of the site is brownfield, it is considered that there is the potential for a minor long-term positive effect on landscapes (SA Objective 11a) as a result of regeneration. As the majority of the site is brownfield land it is also considered to have the potential for a minor positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located adjacent to a local non-designated heritage asset (161 Swindon Road). Mitigation provided through the GCT JCS should ensure that development will not lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 12. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and the appropriate site level assessments are carried out prior to development.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP101: North Place and Portland St	++	++	++	+	+	+	+	- ?	- ?	-	+	+ ?	+	+	+	?	++

Summary:

The Council Sites Assessment has identified that site CP101 has the capacity to accommodate 143 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 2.04 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Clarence Square, and Wellington Square Public Green Spaces. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment

²⁵⁰ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

²⁵¹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

area with the potential for a major positive effect against SA Objective 2b. The site is also located within 800m of most of the services and facilities identified within the Council's accessibility assessment²⁵². Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to secondary education, a children centre and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is uncertainty regarding access to the site, and development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Although mitigation is provided through the GCT JCS and Cheltenham Local Plan, given the higher capacity of the site, it is considered that there is the potential for residual minor negative effects against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or Priority Habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity²⁵³, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study²⁵⁴, and it is not located within or adjacent to the AONB. The site is brownfield land currently used as a car park. It is considered that there is the potential for a minor long-term positive effect on townscape (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located within the Central Conservation Area and is surrounded by Listed Buildings and a local non-designated heritage asset. Mitigation provided through the GCT JCS, and available at the project level, should ensure sensitive and responsive design that respects the historic townscape,

²⁵² Gloucestershire County Council

²⁵³ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

²⁵⁴ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

and that development will not lead to any significant negative effects. The Council's Sites Assessment also identifies that English Heritage responses to development at the site are positive given that the site provides a rare opportunity within a central location. In line with English Heritage advice, it is considered that there is the potential for a minor positive effect against SA Objective 12.

St Peters

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP057: Christ College Site B	++	++	++	+	- ?	+	--	- ?	- ?	-	+	+	-	+	0	?	-

Summary:

The Council Sites Assessment has identified that site CP057 has the capacity to accommodate 53 new dwellings within the early stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 2.11 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is a previous landfill site and as such decontamination and remediation measures may be required prior to development to ensure that there are no negative effects on health. It is considered that sufficient mitigation is provided through the GCT JCS, and available at the project level, to ensure that there will be no significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that appropriate site level assessments are carried out prior to development. The site is located within 300m of St Peters/Chelt Walk Public Green Space. As such, it is considered that after mitigation, there is the potential for a minor positive effect against SA Objective 3.

The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is located within 800m of some of the services and facilities identified within the Council's accessibility assessment²⁵⁵, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this may be possible. Potential for a residual minor negative effect against SA Objective 4 with an element of uncertainty until project level details arise.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. However, the site is located beyond reasonable walking distance (400m) to either a PRoW or Sustrans National Cycle Route. Development at this site is therefore less likely to promote walking and cycling unless significant improvements to the PRoW and Cycle Network are made. Potential for a major negative effect against SA Objective 5b.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Highways Development Management comments²⁵⁶ also note that there may be potential issues with the level crossing. Although mitigation is provided through the GCT JCS and Cheltenham Local Plan, given the higher capacity of the site, it is considered

²⁵⁵ Gloucestershire County Council

²⁵⁶ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

that there is the potential for residual minor negative effects against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of Deciduous Woodland Priority Habitats in the north east. The site is greenfield land; policy mitigation provided through the Cheltenham Local Plan can ensure the appropriate assessment of biodiversity value on site, and any necessary mitigation for supporting habitats. Local policies can also seek to enhance biodiversity features and habitats on site with the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study²⁵⁷, and it is not located within or adjacent to the AONB. The site is entirely greenfield land within the urban area, and was previously used as school playing pitches. It is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP058: Outer West, Land at Tewkesbury Rd	0	++	++	+	+	+	++	- ?	- ?	-	-	+ ?	++	+	+	?	++
Summary:																	
The Council Sites Assessment has identified that site CP058 has the capacity to accommodate 11.35 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.																	

²⁵⁷ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

A large portion of the site is a previous landfill site and as such decontamination and remediation measures may be required prior to development to ensure that there are no negative effects on health. It is considered that sufficient mitigation is provided through the GCT JCS, and available at the project level, to ensure that there will be no significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that appropriate site level assessments are carried out prior to development. The site is located adjacent to St. Peters/Chelt Walk Public Green Space. As such, it is considered that after mitigation, there is the potential for a minor positive effect against SA Objective 3.

The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is also located within 800m of most of the services and facilities identified within the Council's accessibility assessment²⁵⁸. Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to secondary and higher education, a GP surgery and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of both PRoWs and a Sustrans National Cycle Route, and as such development has opportunities to promote these modes of transport with the potential for a major long-term positive effect against SA Objective 5b.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Development Management comments²⁵⁹ further identify that the impact on the A4109 would need consideration. Although mitigation is provided through the GCT JCS and Cheltenham Local Plan, given the higher capacity of the site, it is considered that there is the potential for residual minor negative effects against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. A large part of the site is located within an area of flood risk, mitigation is likely to be difficult and/or expensive; development therefore is considered to have the potential for a minor negative effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located adjacent to Deciduous Woodland Priority Habitats in the west. Brownfield land is considered to have the potential to support a large amount of biodiversity²⁶⁰, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

²⁵⁸ Gloucestershire County Council

²⁵⁹ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze

<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

²⁶⁰ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

The site was not assessed in the GCT JCS Landscape Sensitivity Study²⁶¹, and it is not located within or adjacent to the AONB. This is a large brownfield site within the urban area, containing operational gas works and a mix of retail and employment. Given its current use it is considered that there is the potential for a major long-term positive effect on townscapes (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site contains the Grade II* Listed St Peters Church, and is adjacent to another Listed Building. It is assumed that development will retain the building on site, and mitigation provided through the GCT JCS should ensure that there will be no significant negative effects. Given the nature of the site (operational gas works) it is considered that development has the potential for a minor long-term positive effect against SA Objective 12 through an improved townscape setting.

Site Option	SA Objective																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
CP060: Cheltenham Spa Railway Station	++	++	++	+	-	- ?	++	++	-- ?	-- ?	0	+	-	+	+	0	?	++

Summary:

The Council Sites Assessment has identified that site CP060 has the capacity to accommodate 105 new dwellings within the early stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 3.34 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is located adjacent to a railway line, and mitigation will be required to reduce the associated negative effects on health, including noise pollution. The site is located adjacent to Honeybourne Line Public Green Space, with the potential for minor positive effect against SA Objective 3. Overall therefore it is considered that there is the potential for both minor positive and minor negative effects against SA Objective 3.

The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is located within 800m of some of the services and facilities identified within the Council's accessibility assessment²⁶², however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this may be possible. Potential for a residual minor negative effect against SA Objective 4 with an element of uncertainty until project level details arise.

The site is located within 400m of a bus stop and immediately adjacent Cheltenham Spa train station. Given the accessibility of the site to public transport modes it is considered that there is the potential to reduce reliance on the private vehicle with the potential for a major positive effect

²⁶¹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

²⁶² Gloucestershire County Council

against SA Objective 5a. The site is also located within 400m of both PRowS and a Sustrans National Cycle Route, and as such development has opportunities to promote these modes of transport with the potential for a major long-term positive effect against SA Objective 5b.

There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A40). Development is likely to exacerbate air quality issues in this area also. Highways Development Management comments²⁶³ also note that this site is unlikely to be supported given potential parking issues if the car park on site is lost. An assessment of parking provision would be required. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site contains an area of Deciduous Woodland Priority Habitat. The Cheltenham Local Plan can, through appropriate policy wording; ensure that development retains the existing Priority Habitat on site, however this would significantly reduce the developable area of the site. As such it is considered that if development were to occur on site it is likely to result in at least the partial loss of a Priority Habitat with the potential for a minor negative effect against SA Objective 10. Should the site proceed as a preferred option for development then it is recommended that development proposals seek to provide offsite compensatory measures for any loss of Priority Habitat.

The site was not assessed in the GCT JCS Landscape Sensitivity Study²⁶⁴, and it is not located within or adjacent to the AONB. The site is brownfield land around Cheltenham Spa Railway Station. As a gateway to the town, it is considered that there is the potential for a minor long-term positive effect on townscapes (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located adjacent to the Central Conservation Area and a Listed Lamp Post. Mitigation provided through the GCT JCS should ensure sensitive and responsive design that respects the historic townscape and that development will not lead to any significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that appropriate site level assessments are carried out prior to development. It is therefore considered that there is the potential for a residual neutral effect.

Site Option	SA Objective
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²⁶³ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

²⁶⁴ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP080: Land adjoining Great Western Rd	+	+	++	+	+	+	++	0?	0?	-	--	+	+	+	-	?	++

Summary:

The site is assessed as not suitable, available or achievable within the SALA, however the Council Sites Assessment has identified that site CP080 has the capacity to accommodate 6 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1, or 0.2 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a. At this stage however to reflect the findings of the SALA there is an element of uncertainty.

The site is surrounded by compatible land uses, and is located within 300m of Honeybourne Line, Chelt Walk, and Winston Churchill Gardens Public Green Spaces. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is also located within 800m of most of the services and facilities identified within the Council's accessibility assessment²⁶⁵. Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to secondary education, a children centre and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of both PRow and a Sustrans National Cycle Route, and as such development has opportunities to promote these modes of transport with the potential for a major long-term positive effect against SA Objective 5c.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is located wholly within Flood Risk Zone 3; development therefore has the potential for a major long-term negative effect against SA Objective 9.

The site lies adjacent to a Local Nature Reserve. The Cheltenham Local Plan can, through appropriate policy wording; ensure that development supports the adjacent habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity²⁶⁶, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. It is considered that there are potential opportunities to enhance biodiversity on site.

²⁶⁵ Gloucestershire County Council

²⁶⁶ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study²⁶⁷, and it is not located within or adjacent to the AONB. The site is located within the urban area, and although it is a grassed open space; it is previously developed land. The site used to contain a petrol station, and as a result there is the potential for contamination. It is considered that there is the potential for a minor long-term positive effect on landscapes (SA Objective 11a) through the regeneration of this land. As the site is previously developed land it is also considered to have the potential for a major positive effect on land and soils, development also has the potential to remediate any potential contamination (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located within the Central Conservation Area. Mitigation provided through the GCT JCS should ensure sensitive and responsive design that respects the historic townscape. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Given the location of the site within the Conservation Area, there is the potential for a residual minor negative effect against SA Objective 12.

²⁶⁷ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

Swindon Village

Site Option	SA Objective																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14				
CP001: Land at Hyde Lane, Hyde Lane	++	0	+	+	- ?	+	+	- ?	- ?	0	+	+	+	-	--	0	?	-

Summary:

The Council Sites Assessment has identified that site CP001 has the capacity to accommodate 50 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1.

The site is surrounded by compatible land uses, and is located within 300m of Swindon Village Public Green Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 800m of an existing employment area with the potential for a minor positive effect against SA Objective 2b. The site is located within 800m of one of the services and facilities identified within the Council's accessibility assessment²⁶⁸, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this may be possible. Potential for a residual minor negative effect against SA Objective 4 with an element of uncertainty until project level details arise.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

The site has poor access, and development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Highways Development Management comments²⁶⁹ further identify that there are existing issues at the Hyde Lane junction, in visibility and alignment, in the footway required to the school, and potential bridge issues. Modelling may be required to determine the impact. Although mitigation is provided through the GCT JCS and Cheltenham Local Plan, given the higher capacity of the site, it is considered that there is the potential for residual minor negative effects against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

²⁶⁸ Gloucestershire County Council

²⁶⁹ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of a Deciduous Woodland Priority Habitat. The site is greenfield land; policy mitigation provided through the Cheltenham Local Plan can ensure the appropriate assessment of biodiversity value on site, and any necessary mitigation for supporting habitats. Local policies can also seek to enhance biodiversity features and habitats on site with the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study²⁷⁰ as of medium to low landscape sensitivity. The site is entirely greenfield land, and as such, it is considered that there is the potential for a minor long-term negative effect on the landscape through development in a previously undeveloped area. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective														14		
	1	2	3	4	5	6	7	8	9	10	11	12	13				
CP002: Land at Hyde Farm (west section)	++	++	+	+	-- ?	+	+	- ?	- ?	0	0	+ ?	-	--	0	?	+

Summary:

The Council Sites Assessment has identified that site CP002 has the capacity to accommodate 1,212 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 64.11 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The northern boundary of the site is covered by a Cordon Sanitaire (identified in the existing Local Plan as a Development Exclusion Zone), however it is considered that development could avoid this area of the site to mitigate the potential negative effects arising. The site is located within 300m of existing public or open space, including Hyde Lane Open Space and Zurich Sports Grounds. As such, it is considered that there is the potential, after mitigation, for a minor positive effect against SA Objective 3.

²⁷⁰ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The site is located within 800m of an existing employment area with the potential for a minor positive effect against SA Objective 2b. However, the site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment²⁷¹, and development may increase reliance on the private vehicle in this respect. Potential for a major negative effect against SA Objective 4. Given the capacity of the site there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

The site has poor access, and development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Highways Development Management comments²⁷² further identify that there are existing issues at the Hyde Lane junction, in visibility and alignment, in the footway required to the school, and potential bridge issues. Modelling may be required to determine the impact. Although mitigation is provided through the GCT JCS and Cheltenham Local Plan, given the higher capacity of the site, it is considered that there is the potential for residual minor negative effects against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The northern border of the site is located within an area of flood risk; however development could avoid this area of the site, and mitigation provided through the Local Plan and higher level JCS is considered sufficient to ensure that there will be no significant negative effects; potential for a residual neutral effect against SA Objective 9.

The site does not contain and is not located in close proximity to any designated (or non-designated) biodiversity, or Priority Habitats. The site is greenfield land; policy mitigation provided through the Cheltenham Local Plan can ensure the appropriate assessment of biodiversity value on site, and any necessary mitigation for supporting habitats. Local policies can also seek to enhance biodiversity features and habitats on site with the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study²⁷³ as of both medium to low, and medium to high landscape sensitivity. This is a large site of entirely greenfield land, and as such it is considered that there is the potential for a minor

²⁷¹ Gloucestershire County Council

²⁷² Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

²⁷³ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. Given the size of this site, the potential negative effects are considered to be of greater significance than at the other site options. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site is located adjacent to a local non-designated heritage asset (Old Crossing Cottage). Mitigation provided through the GCT should ensure that development does not lead to any significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP003: Land off Brockhampton Lane	++	0	+	+	-	+	+	0?	0?	0	+	+	??	+	0	?	-

Summary:

The Council Sites Assessment has identified that site CP003 has the capacity to accommodate 25 new dwellings within the early stages of the plan period with the potential for a major long-term positive effect against SA Objective 1.

The site is surrounded by compatible land uses, and is located within 300m of Swindon Village Public Green Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 800m of an existing employment area with the potential for a minor positive effect against SA Objective 2b. The site is located within 800m of some of the services and facilities identified within the Council's accessibility assessment²⁷⁴, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this is considered unlikely. Potential for a residual minor negative effect against SA Objective 4.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is uncertainty regarding access to the site and Highways Development Management comments²⁷⁵ indicate that the level crossing may be an issue at the site. Development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, and at the

²⁷⁴ Gloucestershire County Council

²⁷⁵ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

project level, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of a Deciduous Woodland Priority Habitat. The site is greenfield land; policy mitigation provided through the Cheltenham Local Plan can ensure the appropriate assessment of biodiversity value on site, and any necessary mitigation for supporting habitats. Local policies can also seek to enhance biodiversity features and habitats on site with the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study²⁷⁶ as of medium to high landscape sensitivity. The site is predominantly greenfield land. It is considered that there is the potential for a major long-term negative effect on landscapes (SA Objective 11a) through development in a sensitive landscape area. It should be noted that should the GCT JCS site (Land to the north west of Cheltenham) continue to be promoted in the JCS, then development at the JCS site could reduce the extent of the negative effects on the landscape at this site, as the area surrounding site CP003 is developed. As the site is predominantly greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP004: Land at Hunting Butts (west)	++	0	++	+	-- ?	+	+	-- ?	-- ?	0	+	+	?	--	0	?	-

Summary:

The Council Sites Assessment has identified that site CP004 has the capacity to accommodate 229 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1.

²⁷⁶ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The site is surrounded by compatible land uses, and is located within 300m of Swindon Village Public Green Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. However, the site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment²⁷⁷, and development may increase reliance on the private vehicle in this respect. Potential for a major negative effect against SA Objective 4. Given the capacity of the site there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

The site has poor access, and development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A435). Development is likely to exacerbate air quality issues in this area also. Highways Development Management comments²⁷⁸ further identify that there are existing issues at the Hyde Lane junction, in visibility and alignment, in the footway required to the school, and potential bridge issues. Modelling may be required to determine the impact. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of a Deciduous Woodland Priority Habitat. The site is greenfield land; policy mitigation provided through the Cheltenham Local Plan can ensure the appropriate assessment of biodiversity value on site, and any necessary mitigation for supporting habitats. Local policies can also seek to enhance biodiversity features and habitats on site with the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study²⁷⁹ as of medium to low landscape sensitivity. The site is entirely greenfield land and as such it is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. As the site is greenfield land it is also considered to have the

²⁷⁷ Gloucestershire County Council

²⁷⁸ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/Cheltplan102015/listRespondents>

²⁷⁹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP005: Land at Hunting Butts (south), Swindon Lane	++	++	++	+	- ?	+	+	-- ?	-- ?	0	+	+ ?	-	--	0	?	-

Summary:

The Council Sites Assessment has identified that site CP005 has the capacity to accommodate 157 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 8.3 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of open green space, including Hyde Lane Open Space, Pendil Close Open Space and Wymans Brook Open Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is located within 800m of some of the services and facilities identified within the Council's accessibility assessment²⁸⁰, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this may be possible. Potential for a residual minor negative effect against SA Objective 4 with an element of uncertainty until project level details arise.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

The site has poor access, and development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A435). Development is likely to exacerbate air quality issues in this area also. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

²⁸⁰ Gloucestershire County Council

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain and is not located in close proximity to any designated (or non-designated) biodiversity, or Priority Habitats. The site is predominantly greenfield land; policy mitigation provided through the Cheltenham Local Plan can ensure the appropriate assessment of biodiversity value on site, and any necessary mitigation for supporting habitats. Local policies can also seek to enhance biodiversity features and habitats on site with the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study²⁸¹ as of medium to low landscape sensitivity. The site does contain areas of previously developed land, however it is predominantly greenfield land, and as such is considered to have the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. As the site is predominantly greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
CP006: Land at Hunting Butts (central) west of railway cutting	++	++	+	+	-- ?	+	+	-- ?	-- ?	0	+	+	-	--	0	?	-

Summary:

The Council Sites Assessment has identified that site CP006 has the capacity to accommodate 633 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 33.48 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Swindon Village Public Green Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 800m of an existing employment area with the potential for a minor positive effect against SA Objective 2b. However, the site is located beyond 800m to all of the services and facilities identified within the

²⁸¹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

Council's accessibility assessment²⁸², and development may increase reliance on the private vehicle. Potential for a major negative effect against SA Objective 4. Given the capacity of the site there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is no satisfactory access to the site, and development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A435). Development is likely to exacerbate air quality issues in this area also. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain and is not located in close proximity to any designated (or non-designated) biodiversity, or Priority Habitats. The site is greenfield land; policy mitigation provided through the Cheltenham Local Plan can ensure the appropriate assessment of biodiversity value on site, and any necessary mitigation for supporting habitats. Local policies can also seek to enhance biodiversity features and habitats on site with the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessment have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study²⁸³ as of medium to low landscape sensitivity. The site is entirely greenfield land and as such it is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

²⁸² Gloucestershire County Council

²⁸³ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP007: Land at Hyde Farm (east section)	++	++	+	+	-- ?	+	+	-- ?	-- ?	0	0	+	-	--	0	?	-

Summary:

The Council Sites Assessment has identified that site CP007 has the capacity to accommodate 928 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 49.11 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The northern boundary of the site is covered by a Cordon Sanitaire (identified in the existing Local Plan as a Development Exclusion Zone), however it is considered that development could avoid this area of the site to mitigate the potential negative effects arising. The site is located within 300m of existing public open space, including Newlands Sports Field and Hyde Lane Open Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3.

The site is located within 800m of an existing employment area with the potential for a minor positive effect against SA Objective 2b. However, the site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment²⁸⁴, and development may increase reliance on the private vehicle. Potential for a major negative effect against SA Objective 4. Given the capacity of the site there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, as such there is an element of uncertainty until project level details arise.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A435). Development is likely to exacerbate air quality issues in this area also. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The northern border of the site is located within an area of flood risk, however development could avoid this area of the site, and mitigation provided through the Local Plan and

²⁸⁴ Gloucestershire County Council

higher level JCS is considered sufficient to ensure that there will be no significant negative effects; potential for a residual neutral effect against SA Objective 9.

The site does not contain and is not located in close proximity to any designated (or non-designated) biodiversity, or Priority Habitats. The site is greenfield land; policy mitigation provided through the Cheltenham Local Plan can ensure the appropriate assessment of biodiversity value on site, and any necessary mitigation for supporting habitats. Local policies can also seek to enhance biodiversity features and habitats on site with the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study²⁸⁵ as of medium to low landscape sensitivity. The site is entirely greenfield land and as such it is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site is located adjacent to a local non-designated heritage asset (Old Railway Station). Mitigation provided through the GCT JCS should ensure that development does not lead to any significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP008: Blooms Garden Centre, Evesham Rd	0	++	--	+	-- ?	-	+	-- ?	-- ?	0	--	+ ?	+	--	0	?	++

Summary:

The Council Sites Assessment has identified that site CP008 has the capacity to accommodate 1.24 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Newlands Sports Field. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is not located within 800m of an existing employment area with the potential for a major negative effect against SA Objective 2b. However, this should be considered alongside the provision of employment on site, which can mitigate the negative effects to some degree. The site is located beyond 800m to all of the services and facilities identified within the Council's accessibility

²⁸⁵ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

assessment²⁸⁶, and development may increase reliance on the private vehicle. Potential for a major negative effect against SA Objective 4. Given the capacity of the site there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.

The site is located within 800m of a bus stop and given this distance, development at the site is considered less likely to contribute to a reduced reliance on the private vehicle with the potential for a minor negative effect against SA Objective 5a. The site is however located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance accessibility at this site.

There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A435). Development is likely to exacerbate air quality issues in this area also. Highways Development Management comments²⁸⁷ further identify that visibility to the south is restricted, and there is potential culvert infrastructure issues. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is located wholly within an area of flood risk, and mitigation is likely to be difficult and/or expensive. As such it is considered that there is the potential for a major long-term negative against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or Priority Habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity²⁸⁸, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study²⁸⁹ as of medium to low landscape sensitivity. The entire site is brownfield land located on the edge of the Borough boundary outside of the urban area. Development could regenerate the land with the potential for a minor positive effect on landscapes (SA Objective 11a). As the site is brownfield land it is also considered

²⁸⁶ Gloucestershire County Council

²⁸⁷ Cheltenham Plan Part one: Issues and Option Consultation Respondent: Gloucestershire County Council - Michael Glaze
<http://consult.cheltenham.gov.uk/consult.ti/CheltplanIO2015/listRespondents>

²⁸⁸ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

²⁸⁹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

to have the potential for a major positive effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site is located adjacent to a local non-designated heritage asset (Old Crossing Cottage). Mitigation provided through the GCT JCS should ensure that development does not lead to any significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP059: The Folley, Gardner's Lane	++	++	++	+	+	+	+	- ?	- ?	0	-	+ ?	-	+	0	?	-

Summary:

The Council Sites Assessment has identified that site CP059 has the capacity to accommodate 197 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 6.25 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of St. Peters/Chelt Walk Public Green Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is also located within 800m of most of the services and facilities identified within the Council's accessibility assessment²⁹⁰. Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to secondary and higher education and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

There is satisfactory access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Although mitigation is provided through the GCT JCS and Cheltenham Local Plan, given the higher capacity of the site, it is considered that there is the potential for residual minor negative effects against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

²⁹⁰ Gloucestershire County Council

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The Council's Sites Assessment has identified an area of flood risk on site, though the extent of this remains uncertain at this stage. As such, it is considered that there is the potential for a minor negative effect against SA Objective 9 until further site level assessments have been completed.

The site does not contain and is not located in close proximity to any designated (or non-designated) biodiversity, or Priority Habitats. The site is greenfield land; policy mitigation provided through the Cheltenham Local Plan can ensure the appropriate assessment of biodiversity value on site, and any necessary mitigation for supporting habitats. Local policies can also seek to enhance biodiversity features and habitats on site with the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study²⁹¹, and it is not located within or adjacent to the AONB. The site is entirely greenfield land currently used as a private playing field, within the urban area. It is considered that there is the potential for a minor long-term negative effect on landscapes/townscapes (SA Objective 11a) through development in a previously undeveloped area. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located adjacent to a local non-designated heritage asset (Old Crossing Cottage). Mitigation provided through the GCT JCS should ensure that development does not lead to any significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP085: Land adjoining Kynance, Church Rd	+	0	++	+	-	+	+	-?	0?	-	0	-	-	+	0	?	-

Summary:

The Council Sites Assessment has identified that site CP085 has the capacity to accommodate 9 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1.

The site is surrounded by compatible land uses, and is located adjacent to Swindon Village Public Green Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is located within 800m of some of the services and facilities identified within the Council's

²⁹¹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

accessibility assessment²⁹², however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this is considered unlikely. Potential for a residual minor negative effect against SA Objective 4.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

Development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objective 7, with an element of uncertainty until lower level assessments have been completed, however given that the site has poor access, it is considered that there is still the potential for a minor negative effect against SA Objective 6 with an element of uncertainty until lower level assessments have been completed.

The site is located partially over / adjacent to a minor aquifer of intermediate vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site lies partially within an area of flood risk along the southern boundary, however development could avoid this area of the site, and mitigation provided through the Local Plan and higher level JCS is considered sufficient to address any significant negative effects; potential for a residual neutral effect against SA Objective 9.

The site contains an area of Deciduous Woodland Priority Habitat. The Cheltenham Local Plan can, through appropriate policy wording; ensure that development retains the existing Priority Habitat on site, however this would significantly reduce the developable area of the site. As such it is considered that if development were to occur on site it is likely to result in at least the partial loss of a Priority Habitat with the potential for a minor negative effect against SA Objective 10. Should the site proceed as a preferred option for development then it is recommended that development proposals seek to provide offsite compensatory measures for any loss of Priority Habitat.

The site was not assessed in the GCT JCS Landscape Sensitivity Study²⁹³, and it is not located within or adjacent to the AONB. The site is however located within a Conservation Area with a sensitive townscape setting. The site contains a residential unit, but it is predominantly greenfield land and as such it is considered that there is the potential for a minor long-term negative effect against SA Objective 11a through development in a previously undeveloped area. The potential effects on townscape are also considered to be of greater significance than other sites identified with potential minor negative effects against SA Objective 11a; given its sensitive heritage setting. As the site is predominantly greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

²⁹² Gloucestershire County Council

²⁹³ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The site is located adjacent to Listed Buildings and within the Swindon Village Conservation Area. Mitigation provided through the GCT JCS should ensure sensitive and responsive design that respects the historic townscape and that development will not lead to any significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Taking account of the potential and available mitigation, and low capacity of the site it is considered that there is the potential for a residual neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP093: Depot	++ ?	++ ?	++	+	-- ?	+	+	- ?	- ?	-	+	+ ?	++	+	0	?	++

Summary:

The site has not been assessed through the SALA, however the Council Sites Assessment has identified that site CP093 has the capacity to accommodate 95 new dwellings within the latter stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 3.77 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a. At this stage however to reflect the findings of the SALA there is an element of uncertainty.

The site is an existing waste depot and as such decontamination and remediation measures may be required prior to development to ensure that there are no negative effects on health. It is considered that sufficient mitigation is provided through the GCT JCS, and available at the project level to ensure that there will be no significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that appropriate site level assessments are carried out prior to development. The site is located within 300m of open space, including Richards Road Amenity Greenspace, Windyridge Road Open Space and Wymans Brook Open Space. As such, it is considered that there is the potential, after mitigation, for a minor positive effect against SA Objective 3.

The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. However, the site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment²⁹⁴, and development may increase reliance on the private vehicle. Potential for a major negative effect against SA Objective 4. Given the capacity of the site there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

²⁹⁴ Gloucestershire County Council

There is no satisfactory access to the site, and development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Although mitigation is provided through the GCT JCS and Cheltenham Local Plan, given the higher capacity of the site, it is considered that there is the potential for residual minor negative effects against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or Priority Habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity²⁹⁵, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study²⁹⁶, and it is not located within or adjacent to the AONB. The site is brownfield land located within the urban area, and is currently used as a waste depot. Given its use, it is considered that there is the potential for a major long-term positive effect on townscapes (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located adjacent to a local non-designated heritage asset (Old Crossing Cottage). Mitigation provided through the GCT JCS should ensure that development does not lead to any significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Potential for a residual neutral effect against SA Objective 12.

²⁹⁵ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

²⁹⁶ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

Up Hatherley

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP032: Land at Sunnyfield Lane (south), Up Hatherley Way	+	0	--	+	-	+	+	- ?	- ?	0	+	+	-	--	0	?	-

Summary:

The Council Sites Assessment has identified that site CP032 has the capacity to accommodate 28 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1.

The site is surrounded by compatible land uses, and is located within 300m of Manor Park, and Holmer Park/Greatfield Park. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is not located within 800m of an existing employment area with the potential for a major negative effect against SA Objective 2b. The site is located within 800m of one of the services and facilities identified within the Council's accessibility assessment²⁹⁷, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this is considered unlikely. Potential for a residual minor negative effect against SA Objective 4.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

The site has poor access, and development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the M5). Development is likely to exacerbate air quality issues in this area also. However, given the lower capacity of the site, and mitigation provided through the GCT JCS and Cheltenham Local Plan, it is considered that there is the potential for a residual minor negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it is located within 200m of a Traditional Orchard Priority Habitat. The Cheltenham Local Plan can support the enhancement of features, through appropriate policy wording. It is considered that there are potential

²⁹⁷ Gloucestershire County Council

opportunities to enhance biodiversity on site, and as such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study²⁹⁸ as of medium landscape sensitivity. The site is entirely greenfield land and as such it is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
CP033: Land at Sunnyfield Lane (north), Up Hatherley Way	+	0	+	+	-	+	+	- ?	- ?	0	+	- ?	-	--	0	?	?

Summary:

The Council Sites Assessment has identified that site CP033 has the capacity to accommodate 22 new dwellings within the latter stages of the plan period with the potential for a minor long-term positive effect against SA Objective 1.

The site is surrounded by compatible land uses, and is located within 300m of Manor Park, and Holmer Park/Greatfield Park. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 800m of an existing employment area with the potential for a minor positive effect against SA Objective 2b. The site is located within 800m of some of the services and facilities identified within the Council's accessibility assessment²⁹⁹, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this is considered unlikely. Potential for a residual minor negative effect against SA Objective 4.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections could enhance the identified positive effects.

²⁹⁸ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

²⁹⁹ Gloucestershire County Council

The site has poor access, and development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the M5). Development is likely to exacerbate air quality issues in this area also. However, given the lower capacity of the site, and the mitigation provided through the GCT JCS and Cheltenham Local Plan, it is considered that there is the potential for a residual minor negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site contains an area of Traditional Orchard Priority Habitat. The Cheltenham Local Plan can, through appropriate policy wording; ensure that development retains the existing Priority Habitat on site, however this would reduce the developable area of the site. As such it is considered that there is the potential for the loss or partial loss of a Priority Habitat and a minor negative effect against SA Objective 10, with an element of uncertainty until site level details arise. Should the site proceed as a preferred option for development then it is recommended that development proposals seek to provide offsite compensatory measures for any loss of Priority Habitat.

This site is not located within or adjacent to the AONB and was identified in the GCT JCS Landscape Sensitivity Study³⁰⁰ as of medium landscape sensitivity. The site is entirely greenfield land and as such it is considered that there is the potential for a minor long-term negative effect on landscape (SA Objective 11a) through development in a previously undeveloped area. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site is located adjacent to a local non-designated heritage asset (Woodbines Cottage). Mitigation provided through the GCT JCS should ensure that development does not lead to any significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Potential for a residual neutral effect against SA Objective 12.

³⁰⁰ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

Additional Sites

Battledown

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
S117: Land adjacent to Longfield, Charlton Kings	+	+?	+	+	--	+	+	0?	0?	0	0	+	--	+	0	?	-

Summary:

The Council Sites Assessment has identified that site S117 has the capacity to accommodate 32 new dwellings with the potential for a minor long-term positive effect against SA Objective 1, or 0.99 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a. However the site is also identified as not suitable, available or achievable for employment development, and as such there is an element of uncertainty against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of existing open space at Hartlebury Way. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 800m of an existing employment area with the potential for a minor positive effect against SA Objective 2b. However, the site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment³⁰¹, and development may increase reliance on the private vehicle. Potential for a major negative effect against SA Objective 4. Given the capacity of the site it is considered unlikely that development will deliver any significant contributions to reduce the extent of these effects.

The site is located within 400m of bus stops along London Road and East End Road, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections within this area of the Borough could significantly enhance the identified positive effects.

There is uncertainty regarding access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The site is not located within any Surface Water Safeguard Zones, Groundwater Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones, or Water Protection Zones with the potential for a neutral effect against SA Objective 8. A small area of the site that

³⁰¹ Gloucestershire County Council

runs along the watercourse boundary is located within an area of flood risk, however, it is considered that development could avoid this area of the site, and given the rising gradient to the north of the site, development in the remainder of the site is unlikely to lead to any significant negative effects; potential for a residual neutral effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. The Cheltenham Local Plan can support the enhancement of features, through appropriate policy wording. It is considered that there are potential opportunities to enhance biodiversity on site, particularly along the watercourse and flood risk area, and as such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site was not assessed in the GCT JCS Landscape Sensitivity Study³⁰², however it is greenfield land located within the AONB. Although there is dense vegetation screening along the northern edge of the site, development within the AONB is considered to have the potential for a major negative effect against SA Objective 11. The site is not known to contain best and most versatile agricultural land, however there is the potential for a minor negative effect against SA Objective 14 through the loss of greenfield land. The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site does not contain, and is not located in close proximity to any designated heritage assets. The site is also not located within a Conservation Area. Potential for a neutral effect against SA Objective 12.

Benhall and the Reddings

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
S122: Land rear of Nuffield Hospital, Hatherley Lane	++	+	++	+	-	+	++	- ?	- ?	0	+	+	+	+	0	?	++

Summary:

The Council Sites Assessment has identified that site S122 has the capacity to accommodate 27 new dwellings within the early stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 0.48 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

³⁰² GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The site is located adjacent to a hospital and as such there may be minor short-term negative effects on health during the construction phases of development at this site, mitigation will be required to minimise the effects. The site is however located within 300m of numerous areas of open / green space. As such, there is the potential for a minor negative effect against SA Objective 3 in the short-term, however in the longer-term it is considered overall that there is the potential for a minor positive effect.

The site is located within an existing employment area and within 400m of further employment land, with the potential for a major positive effect against SA Objective 2b. The site is located within 800m of one of the services and facilities identified within the Council's accessibility assessment³⁰³, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this is considered unlikely. Potential for a residual minor negative effect against SA Objective 4.

The site is located within 400m of bus stops on Hatherley Lane, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRoW and a national cycle route, with the potential for a major positive effect against SA Objective 5b.

There is uncertainty regarding access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the M5, A40, B4063 and B4634). Development is likely to exacerbate air quality issues in this area also. However, given the lower capacity of the site, and mitigation provided through the GCT JCS and Cheltenham Local Plan, it is considered that there is the potential for a residual minor negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.

The site is not located within any Surface Water Safeguard Zones, Groundwater Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones, or Water Protection Zones with the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; with the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated biodiversity, however it is located adjacent to a Deciduous Woodland Priority Habitat. Brownfield land is considered to have the potential to support a large amount of biodiversity³⁰⁴, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on site, as well as support habitat enhancement, and opportunities to provide linkages with the adjacent priority habitat. As such, it is considered that there is the potential for a minor positive effect against SA Objective 10 with an element of uncertainty until policy mitigation and site level assessments have been completed.

³⁰³ Gloucestershire County Council

³⁰⁴ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

This site was not assessed in the GCT JCS Landscape Sensitivity Study³⁰⁵, and it is not located within or adjacent to the AONB. The site is brownfield land in the urban area. It is considered therefore that there is the potential for a minor long-term positive effect on townscape (SA Objective 11) through the regeneration of this land. As the site is previously developed land it is also considered to have the potential for a major positive effect on land and soils, development also has the potential to remediate any potential contamination (SA Objective 14) and the Cheltenham Local Plan can ensure that the appropriate policy mitigation is in place for contamination assessment and remediation. The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site does not contain, and is not located in close proximity to any designated heritage assets. The site is also not located within a Conservation Area. Potential for a neutral effect against SA Objective 12.

Charlton Kings

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
S114: Land adj. to Timbercombe Farm, Little Herberts Rd	+	+?	++	+	--	+	+	0?	0?	0	+	+?	--	+	0	?	+

Summary:

The Council Sites Assessment has identified that site S114 has the capacity to accommodate 4 new dwellings with the potential for a minor long-term positive effect against SA Objective 1, or 0.13 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a. However the site is also identified as not suitable, available or achievable for employment development, and as such there is an element of uncertainty against SA Objective 2a.

The site is surrounded by compatible land uses, and is located adjacent to Little Herberts Nature Reserve. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. However, the site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment³⁰⁶, and development may increase reliance on the private vehicle. Potential for a major negative effect against SA Objective 4. Given the capacity of the site it is considered unlikely that development will deliver any significant contributions to reduce the extent of these effects.

³⁰⁵ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

³⁰⁶ Gloucestershire County Council

The site is located within 400m of bus stops along Cirencester Road and Bradley Road, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is located within 400m of PRoWs with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections within this area of the Borough could significantly enhance the identified positive effects.

There is uncertainty regarding access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The site is not located within any Surface Water Safeguard Zones, Groundwater Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones, or Water Protection Zones with the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; with the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated biodiversity, however it is located adjacent to a Deciduous Woodland Priority Habitat. The Cheltenham Local Plan can support the enhancement of features, through appropriate policy wording. It is considered that there are potential opportunities to enhance biodiversity on site, particularly opportunities to provide connectivity between the site, the Priority Habitat and additional habitats just south west of the site, and as such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site was not assessed in the GCT JCS Landscape Sensitivity Study³⁰⁷, however it is greenfield land located within the AONB. Although the site is bound by existing housing and an access road to Timbercombe Farm, development within the AONB is considered to have the potential for a major negative effect against SA Objective 11. The site is not known to contain best and most versatile agricultural land, however there is the potential for a minor negative effect against SA Objective 14 through the loss of greenfield land. The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site does not contain, and is not located in close proximity to any designated heritage assets. The site is also not located within a Conservation Area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14

³⁰⁷ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

S115: Land to rear of 291-297 Cirencester Rd	+	+?	++	+	--	+	+	0?	0?	0	+	+?	--	+	0	?	-
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Summary:

The Council Sites Assessment has identified that site S115 has the capacity to accommodate 12 new dwellings with the potential for a minor long-term positive effect against SA Objective 1, or 0.35 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a. However the site is also identified as not suitable, available or achievable for employment development, and as such there is an element of uncertainty against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Little Herberts Nature Reserve. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. However, the site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment³⁰⁸, and development may increase reliance on the private vehicle. Potential for a major negative effect against SA Objective 4. Given the capacity of the site it is considered unlikely that development will deliver any significant contributions to reduce the extent of these effects.

The site is located within 400m of bus stops along Cirencester Road and Bradley Road, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is located within 400m of PRoWs with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections within this area of the Borough could significantly enhance the identified positive effects.

There is uncertainty regarding access to the site, however development at the site option is likely to increase traffic on the highways network and this may have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The site is not located within any Surface Water Safeguard Zones, Groundwater Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones, or Water Protection Zones with the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; with the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated biodiversity, however it is known to contain priority habitats (no main habitat identified), and is located adjacent to a Deciduous Woodland Priority Habitat. The Cheltenham Local Plan can support the enhancement of features, through appropriate policy wording. It is considered that there are potential opportunities to enhance biodiversity on site, particularly opportunities to provide connectivity between the habitats on site and the woodland just north of the site, and as such, there is the potential for a

³⁰⁸ Gloucestershire County Council

minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site was not assessed in the GCT JCS Landscape Sensitivity Study³⁰⁹, however it is greenfield land located within the AONB. Although the site is bound by existing housing and Little Herberts Road to a large extent, development within the AONB is considered to have the potential for a major negative effect against SA Objective 11. The site is not known to contain best and most versatile agricultural land, however there is the potential for a minor negative effect against SA Objective 14 through the loss of greenfield land. The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site does not contain any designated heritage assets and is not located within a Conservation Area. Although there is a Listed Building to the west of the site, this is largely screened by existing residential development in between. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
S121: The Bredons, Harp Hill	++	+?	--	-	--	--	+	0?	0?	-	+	+?	--	+	0	?	+

Summary:

The Council Sites Assessment has identified that site S121 has the capacity to accommodate 2 new dwellings in the early stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 0.46 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a. However the site is also identified as not suitable, available or achievable for employment development, as such there is an element of uncertainty against SA Objective 2a.

The site is surrounded by compatible land uses, however it is not located within 300m of existing public open space. As such, it is considered that there is the potential for a minor negative effect against SA Objective 3. Given the size of the site it is also unlikely that new open space could be provided with development to mitigate the identified negative effect. The site is located just over 800m from an existing employment area and development is less likely to reduce reliance on the private car in this respect, with the potential for a major negative effect against SA Objective 2b. However, the site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment³¹⁰, and development may increase reliance on the private vehicle. Potential for a major negative effect against SA Objective 4. Given the capacity of the site it is considered unlikely that development will deliver any significant contributions to reduce the extent of these effects.

³⁰⁹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

³¹⁰ Gloucestershire County Council

The site is located within 800m of a bus stop along Redmarley Road, however, there is no direct route to this bus stop, and given the distance development at this site is considered unlikely to reduce reliance on the private car with the potential for a major negative effect against SA Objective 5a. The site is located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections within this area of the Borough could significantly enhance the identified positive effects.

There is uncertainty regarding access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The whole site overlies a minor aquifer of low vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; with the potential for a minor positive effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it does contain an area of Deciduous Woodland Priority Habitat. The Cheltenham Local Plan can ensure the habitat is retained in development, and it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site was not assessed in the GCT JCS Landscape Sensitivity Study³¹¹, however it is greenfield land located within the AONB. Although the site is bound by existing housing and Harp Hill to a large extent, development within the AONB is considered to have the potential for a major negative effect against SA Objective 11. The site is not known to contain best and most versatile agricultural land, however there is the potential for a minor negative effect against SA Objective 14 through the loss of greenfield land. The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located adjacent to Hewlett's Camp Scheduled Monument. The site is considered to have a low capacity for housing, and mitigation provided through the GCT JCS should ensure that development will not lead to any significant negative effects. The Scheduled Monument has existing residential development surrounding it, and as such it is considered that development at this site is unlikely to significantly alter its setting. It is considered therefore that there is the potential for a residual neutral effect against SA Objective 12.

Charlton Park

³¹¹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
S116: The East Gloucestershire Club, Old Bath Rd	++	++	+	+	-	+	+	0?	0?	-	+	+	+	+	0	?	++
<p>Summary: The Council Sites Assessment has identified that site S116 has the capacity to accommodate 4 new dwellings in the early stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 3.53 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.</p> <p>The site is surrounded by compatible land uses, however development would result in the loss of open space at the East Gloucestershire Tennis Club. Despite this, the site is still surrounded by a number of other areas of green and open space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The Cheltenham Local Plan should seek to provide off-site contributions to new green infrastructure as a result of development at this site, and the inevitable loss of open space.</p> <p>The site is located just over 400m from existing employment land with the potential for a minor positive effect against SA Objective 2b. The site is located within 800m of one of the services and facilities identified within the Council's accessibility assessment³¹², however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this is considered unlikely. Potential for a residual minor negative effect against SA Objective 4.</p> <p>The site is located within 400m of bus stops along Old Bath Road, Thirlestaine Road and Charlton Park Drive, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections at this site could significantly enhance the identified positive effects.</p> <p>There is uncertainty regarding access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.</p> <p>The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; with the potential for a minor positive effect against SA Objective 9.</p>																	

³¹² Gloucestershire County Council

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity³¹³, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. With the sites current use as tennis courts, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site was not assessed in the GCT JCS Landscape Sensitivity Study³¹⁴, and it is not located within or adjacent to the AONB. The site is brownfield land in the urban area, currently used as tennis courts. It is considered therefore that there is the potential for a minor long-term positive effect on townscape (SA Objective 11) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located within the Central Conservation Area, and lies adjacent to Listed Buildings. Mitigation provided through the GCT JCS, and available at the project level, should ensure sensitive and responsive design that respects the historic townscape, and that development does not significantly affect designated heritage assets or their settings. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. It is considered therefore that taking mitigation into account there is the potential for a residual neutral effect against SA Objective 12.

College

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
S119: Karenza, Naunton Parade	+ ?	0	++	+	+	+	+	0 ?	0	-	+	+ ?	+	+	0	?	+

Summary:

The Council Sites Assessment has identified that site S119 has the capacity to accommodate 13 new dwellings with the potential for a minor long-term positive effect against SA Objective 1. However, the site is also identified as not suitable, available or achievable for employment development, and as such there is an element of uncertainty against SA Objective 1.

³¹³ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

³¹⁴ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The site is surrounded by compatible land uses, and is located within 300m of existing open space at Bath Road. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. It is also located within 800m of most of the services and facilities identified within the Council's accessibility assessment³¹⁵. Potential for a minor long-term positive effect against SA Objective 4. Development that enhances access to secondary and higher education, a children centre and/or A&E could enhance the significance of the identified positive effects.

The site is located within 400m of bus stops along Bath Road, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections within this area of the Borough could significantly enhance the identified positive effects.

There is uncertainty regarding access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until regarding access until site level assessments have been completed.

The whole site overlies a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity³¹⁶, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. As such, it is considered that there is the potential for a minor positive effect against SA Objective 10 with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site was not assessed in the GCT JCS Landscape Sensitivity Study³¹⁷, and it is not located within or adjacent to the AONB. The site is predominantly brownfield land. It is considered that there is the potential for a minor long-term positive effect on landscapes (SA Objective 11a) through the regeneration of this land. As the site is predominantly brownfield land it is also considered to have the potential for a minor positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

³¹⁵ Gloucestershire County Council

³¹⁶ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

³¹⁷ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The site is located within the Central Conservation Area. Mitigation provided through the GCT JCS should ensure sensitive and responsive design that respects the historic townscape, and that development will not lead to any significant negative effects. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Taking into account the available and potential mitigation, and the capacity of the site, it is considered that there is the potential for a residual neutral effect against SA Objective 12.

There is no evidence relevant to site options for appraising the nature and significance of the effects against SA Objective 13 and, therefore, uncertainty is reported.

Oakley

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
S113: Premiere Products, Bouncers Lane	++	++	++	+	- ?	+	+	- ?	- ?	-	+	+	+	+	+ ?	?	++

Summary:

The Council Sites Assessment has identified that site S113 has the capacity to accommodate 50-70 new dwellings in the early stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 2.17 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of existing public open space, including the adjacent Bouncers Lane Cemetery and Priors Farm Playing Field. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. The site is located within 800m of some of the services and facilities identified within the Council's accessibility assessment³¹⁸, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this may be possible. Potential for a residual minor negative effect against SA Objective 4 with an element of uncertainty until project level details arise.

The site is located within 400m of bus stops along Bouncers Lane and Priors Road, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections at this site could significantly enhance the identified positive effects.

³¹⁸ Gloucestershire County Council

There is uncertainty regarding access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. Although mitigation is provided through the GCT JCS and Cheltenham Local Plan, given the higher capacity of the site, it is considered that there is the potential for residual minor negative effects against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The whole site overlies a minor aquifer of high and intermediate vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. Although the site runs adjacent to a watercourse along its southern boundary, it is not located within an area of flood risk; with the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity³¹⁹, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use as warehouse employment land, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site was not assessed in the GCT JCS Landscape Sensitivity Study³²⁰, and it is not located within or adjacent to the AONB. The site is brownfield land in the urban area, currently used as warehousing. It is considered therefore that there is the potential for a minor long-term positive effect on townscape (SA Objective 11) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site is located adjacent to Bouncer's Lane Cemetery Registered Park and Garden, which also contains Listed Buildings. Development has the potential alter the setting of the designated heritage asset however given the current use as warehousing, it is considered that there is an opportunity to improve the setting of the heritage asset. Mitigation provided through the GCT JCS should ensure that development does not lead to any significant negative effects, and the Cheltenham Local Plan can support the delivery of positive effects on the townscape and heritage setting with the potential for a minor positive effect against SA Objective 12, with an element of uncertainty until site level assessments and proposals have been completed.

³¹⁹ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

³²⁰ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

Pittville

Site Option	SA Objective															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		
S123: 100-102 Prestbury Rd	++	+	--	+	--	+	+	0?	0?	-	0	+	+	0	?	++

Summary:

The Council Sites Assessment has identified that site S123 has the capacity to accommodate 40 new dwellings in the early stages of the plan period with the potential for a major long-term positive effect against SA Objective 1, or 0.80 ha of employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of existing public open space at Pittville Crescent. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is not located within 800m of an existing employment area with the potential for a major negative effect against SA Objective 2b, however this should be considered alongside the potential provision of employment land on site. However, the site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment³²¹, and development may increase reliance on the private vehicle. Potential for a major negative effect against SA Objective 4. Given the capacity of the site it is considered unlikely that development will deliver any significant contributions to reduce the extent of these effects.

The site is located within 400m of bus stops along Prestbury Road, Windsor Street and Albert Road, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections at this site could significantly enhance the identified positive effects.

There is uncertainty regarding access to the site, however development at the site option is likely to increase traffic on the highways network and thus have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The site lies partially over a minor aquifer of high vulnerability; development therefore has the potential for a minor negative effect against SA Objective 8. The site is also partially located within an area of flood risk, however it is considered that development on the site could avoid the area of flood risk, with the potential for a residual neutral effect against SA Objective 9.

³²¹ Gloucestershire County Council

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. Brownfield land is considered to have the potential to support a large amount of biodiversity³²², and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use as a recovery garage, it is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study³²³, and it is not located within or adjacent to the AONB. The site is previously developed land located within the urban area. The former use as a vehicle recovery garage has the potential for contamination. It is considered that there is the potential for a minor long-term positive effect on landscapes (SA Objective 11) through the regeneration of this land. As the site is previously developed land it is also considered to have the potential for a major positive effect on land and soils, development also has the potential to remediate any potential contamination (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site lies adjacent to a Listed Building. Mitigation provided through the GCT JCS, and available at the project level, should ensure sensitive and responsive design that respects the historic townscape, and that development does not significantly affect designated heritage assets or their settings. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. It is considered therefore that taking mitigation into account there is the potential for a residual neutral effect against SA Objective 12.

Prestbury

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
S124: Park Corner & Land to West of Park Corner, Bowbridge Lane	+	++	--	+	-	+	+	0?	0?	0	+	+	?	--	0?	?	-
Summary:																	

³²² JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

³²³ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The Council Sites Assessment has identified that site S124 has the capacity to accommodate 25-30 new dwellings with the potential for a minor long-term positive effect against SA Objective 1, or 1.10 ha of employment land with the potential for a major long-term positive effect against SA Objective 2a.

The site is surrounded by compatible land uses, and is located within 300m of Apple Orchard open space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is not located within 800m of an existing employment area with the potential for a major negative effect against SA Objective 2b, however this should be considered alongside the potential provision of employment land on site. The site is located within 800m of one of the services and facilities identified within the Council's accessibility assessment³²⁴, however unless development provides significant contributions to new or improved provisions then it is unlikely to reduce the need to travel. Given the capacity of the site this is considered unlikely. Potential for a residual minor negative effect against SA Objective 4.

The site is located within 400m of bus stops along Linden Avenue and The Burgage, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is located within 400m of a PRow with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections at this site could significantly enhance the identified positive effects.

There is uncertainty regarding access to the site, however development at the site option is likely to increase traffic on the highways network and this could have a minor indirect negative effect on air quality. However, given the low capacity of the site, and the mitigation available through the GCT JCS and Cheltenham Local Plan, it is considered unlikely to lead to any significant negative effects, with the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The site is not located within any Surface Water Safeguard Zones, Groundwater Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones, or Water Protection Zones with the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; with the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. The site is greenfield land; policy mitigation provided through the Cheltenham Local Plan can ensure the appropriate assessment of biodiversity value on site, and any necessary mitigation for supporting habitats. Local policies can also seek to enhance biodiversity features and habitats on site with the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

³²⁴ Gloucestershire County Council

This site was not assessed in the GCT JCS Landscape Sensitivity Study³²⁵, and it is not located within or adjacent to the AONB. The site is entirely greenfield land and as such it is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11) through development in a previously undeveloped area. The site is not known to contain best and most versatile agricultural land, however there is the potential for a minor negative effect against SA Objective 14 through the loss of greenfield land. The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site lies adjacent to Prestbury Conservation Area and its Listed Buildings in the south, and a moated site Scheduled Monument is in close proximity to the north. Mitigation provided through the GCT JCS, and available at the project level, should ensure sensitive and responsive design that respects the historic townscape, and that development does not significantly affect designated heritage assets or their settings. The Cheltenham Local Plan can, through appropriate policy wording, ensure that local level heritage is protected according to its significance, and that appropriate site level assessments are carried out prior to development. Given the scale of development and existing residential development between the site and the Conservation Area, it is considered therefore that taking mitigation into account there is the potential for a residual neutral effect against SA Objective 12 with an element of uncertainty at this stage.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
S125: Land North West of Racecourse	++	0	+	+	-- ?	+	+	-- ?	-- ?	0	0	+ ?	+ -	--	0	?	+

Summary:

The Council Sites Assessment has identified that site S125 has the capacity to accommodate 1183 new dwellings with the potential for a major long-term positive effect against SA Objective 1.

The site is surrounded by compatible land uses, and is located within 300m of Newlands Sports Field. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within 800m of an existing employment area with the potential for a minor positive effect against SA Objective 2b. However, the site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment³²⁶, and development may increase reliance on the private vehicle. Potential for a major negative effect against SA Objective 4. Given the capacity of the site there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.

³²⁵ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

³²⁶ Gloucestershire County Council

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections at this site could significantly enhance the identified positive effects.

There is satisfactory access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A435). Development is likely to exacerbate air quality issues in this area also. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The site is not located within any Surface Water Safeguard Zones, Groundwater Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones, or Water Protection Zones with the potential for a neutral effect against SA Objective 8. The site lies partially within an area of flood risk, however it is considered that development at the site could easily avoid the area of flood risk, with the potential for a residual neutral effect against SA Objective 9.

The site does not contain any designated (or non-designated) biodiversity, however it does contain an area of Deciduous Woodland Priority Habitat. The Cheltenham Local Plan can support the appropriate assessment of biodiversity value on site, as well as support habitat enhancement, and opportunities to provide linkages external from the site. As such, it is considered that there is the potential for a minor positive effect against SA Objective 10 with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site was not assessed in the GCT JCS Landscape Sensitivity Study³²⁷, and it is not located within or adjacent to the AONB. The site is part brownfield land used as a car park and part arable land. It is considered therefore that there is the potential for both minor long-term positive and negative effects on townscape (SA Objective 11) through partial regeneration and partial loss of greenfield land. The site is not known to contain agricultural land, however similarly there is the potential for both positive and negative effects against SA Objective 14 through partial regeneration of previously developed land, and partial loss of greenfield land. The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located in close proximity to any designated heritage assets. The site is also not located within a Conservation Area. Potential for a neutral effect against SA Objective 12.

Site Option	SA Objective																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14					
S126: Land South West of Racecourse	++	0	++	-	-- ?	+	+	-- ?	-- ?	0	+	+	+	-	--	0	?	+	-

³²⁷ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

Summary:

The Council Sites Assessment has identified that site S126 has the capacity to accommodate 74 new dwellings with the potential for a major long-term positive effect against SA Objective 1.

The site is surrounded by compatible land uses, however it is not located within 300m of existing public open space. As such, it is considered that there is the potential for a minor negative effect against SA Objective 3. The site is located within 400m of an existing employment area with the potential for a major positive effect against SA Objective 2b. However, the site is located beyond 800m to all of the services and facilities identified within the Council's accessibility assessment³²⁸, and development may increase reliance on the private vehicle. Potential for a major negative effect against SA Objective 4. Given the capacity of the site there is the potential for development to enhance service and facility provisions in this area, which could contribute to reducing the significance of the identified effects, and as such there is an element of uncertainty until project level details arise.

The site is located within 400m of bus stops along New Barn Lane, which can contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is located within 400m of a PRoW with the potential for a minor positive effect against SA Objective 5b. The creation of new cycle route connections at this site could significantly enhance the identified positive effects.

There is uncertainty regarding access to the site, however development at this site option has the potential to increase levels of traffic in an area that is already experiencing congestion problems (around the A435). Development is likely to exacerbate air quality issues in this area also. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level assessments have been completed.

The site is not located within any Surface Water Safeguard Zones, Groundwater Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones, or Water Protection Zones with the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; with the potential for a minor positive effect against SA Objective 9.

The site does not contain, and is not located in close proximity to any designated (or non-designated) biodiversity, or priority habitats. The Cheltenham Local Plan can support the appropriate assessment of biodiversity value on site, as well as retention of important habitats and enhancement of features where appropriate. It is considered that there are potential opportunities to enhance biodiversity on site. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site was not assessed in the GCT JCS Landscape Sensitivity Study³²⁹, and it is not located within or adjacent to the AONB. The site is part brownfield land and part greenfield land. It is considered therefore that there is the potential for both minor long-term positive and negative effects on townscape (SA Objective 11) through partial regeneration and partial loss of greenfield land. The site is not known to contain agricultural land,

³²⁸ Gloucestershire County Council

³²⁹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

however similarly there is the potential for both positive and negative effects against SA Objective 14 through partial regeneration of previously developed land, and partial loss of greenfield land. The site is located within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located in close proximity to any designated heritage assets. The site is also not located within a Conservation Area. Potential for a neutral effect against SA Objective 12.

Employment Site Options

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
E1: Land south of Jessop Avenue, Town Centre	0	+	++	+	++	+	++	0	0	-	--	+?	+	+	0?	?	++
<p>Summary: The Council has identified that site E1 can deliver up to 0.34ha of new employment land with the potential for a minor long-term positive effect against SA Objective 2a.</p> <p>The site is surrounded by compatible land uses, and is located adjacent to Chelt Walk (Jessops Avenue) Public Green Space. As such, it is considered that there is the potential for a minor positive effect against SA Objective 3. The site is located within the town centre, within 400m of existing employment areas with the potential for a major positive effect against SA Objective 2b, and within reasonable walking distance of central services and facilities with the potential for a major positive effect against SA Objective 4 given that development in this area is highly likely to reduce reliance on the private vehicle.</p> <p>The site is located within 400m of bus stops along St Georges Road, which can further contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow and cycle route with the potential for a major positive effect against SA Objective 5b.</p> <p>The site has existing access, and given its existing use as a car park, development at this site option is unlikely to significantly increase levels of traffic in the immediate area, particularly considering the lower capacity of the site for employment development, and the mitigation provided through the GCT JCS and Cheltenham Local Plan. Overall, it is considered that there is the potential for a residual neutral effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.</p> <p>The site overlies a minor aquifer of high vulnerability with the potential for a minor negative effect against SA Objective 8. The site is located wholly within flood risk zone 2 with the potential for a major negative effect against SA Objective 9.</p> <p>The site lies adjacent to a Deciduous Woodland Priority Habitat. Brownfield land is considered to have the potential to support a large amount of biodiversity³³⁰, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current use, it is considered that there are potential opportunities to enhance biodiversity on site, which could further support the existing priority habitats. As such, there is the potential for a</p>																	

³³⁰ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessments have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study³³¹, and it is not located within or adjacent to the AONB. The site is brownfield land within the urban area. It is considered that there is the potential for a minor long-term positive effect on townscapes (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site lies within the Central Conservation Area. Mitigation provided through the GCT JCS should ensure sensitive and responsive design that respects the historic townscape. Taking account of the available mitigation and capacity of the site, its current use as a car park and the identified potential for positive effects on townscape, it is considered that there is the potential for a residual neutral effect against SA Objective 12 with an element of uncertainty until site level details arise.

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
E2: Land south of Hatherley Lane, The Reddings	0	+	+	+	+	+	++	- ?	- ?	0	+	+ ?	+	+	0	?	+

Summary:

The Council has identified that site E2 can deliver up to 0.86ha of new employment land with the potential for a minor long-term positive effect against SA Objective 2a.

The site is located adjacent to a hospital and as such there may be minor short-term negative effects on health during the construction phases of development at this site, mitigation will be required to minimise the effects. The site is however located within reasonable walking distance of Public Green Space at Arle Court. As such, it is considered that there is the potential for a minor negative effect against SA Objective 3 in the short-term, however in the longer-term it is considered overall that there is the potential for a minor positive effect.

The site is existing vacant employment land located in close proximity to other areas of employment land with the potential for a minor positive effect against SA Objective 2b. The site has not been subject to an accessibility assessment using Gloucestershire County Council's mapping services, however it is identified through google that the site is in close proximity to a number of services, including a superstore, health services at the hospital and various educational facilities. Development is likely to contribute to reducing reliance on the private vehicle with the potential for a minor long term positive effect against SA Objective 4.

³³¹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

The site is located within 400m of bus stops along Hatherley Lane, which can further contribute to a reduced reliance on the private vehicle. Potential for a minor long-term positive effect against SA Objective 5a. The site is also located within 400m of a PRow and cycle route with the potential for a major positive effect against SA Objective 5b.

The site has existing access, however (as the site is currently vacant), development is likely to increase traffic on local roads. Given the lower capacity of the site, and the mitigation provided through the GCT JCS and Cheltenham Local Plan saved policies, this increase is not likely to be significant with the potential for a residual minor negative effect against SA Objectives 6 and 7. There is an element of uncertainty until site level details and assessments are completed.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site lies adjacent to a Deciduous Woodland Priority Habitat. Brownfield land is considered to have the potential to support a large amount of biodiversity³³², and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features, through appropriate policy wording. Given the sites current vacant nature, it is considered that there are potential opportunities to enhance biodiversity on site, which could further support the existing priority habitats. As such, there is the potential for a minor long-term positive effect against SA Objective 10, with an element of uncertainty until policy mitigation and site level assessment have been completed.

The site was not assessed in the GCT JCS Landscape Sensitivity Study³³³, and it is not located within or adjacent to the AONB. The site is brownfield land within the urban area. It is considered that there is the potential for a minor long-term positive effect on townscapes (SA Objective 11a) through the regeneration of this land. As the site is brownfield land it is also considered to have the potential for a major positive effect on land and soils (SA Objective 14). The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

³³² JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

³³³ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
E3: Land north-west of Grovefield Way, The Reddings	0	++	+	-	+	--	++	--?	--?	0	+	+?	-	--	0	?	-
<p>Summary: The Council has identified that site E3 can deliver up to 6.26ha of new employment land with the potential for a major long-term positive effect against SA Objective 2a.</p> <p>The site is surrounded by compatible land uses; however, it is not located within 300m of existing public open space. As such, it is considered that there is the potential for a minor negative effect against SA Objective 3. The site is located in close proximity to other areas of employment land with the potential for a minor positive effect against SA Objective 2b. The site has not been subject to an accessibility assessment using Gloucestershire County Council's mapping services, however it is identified through google that the site is in close proximity to a number of services, including a superstore, health services at the hospital and various educational facilities. Development is likely to contribute to reducing reliance on the private vehicle with the potential for a minor long term positive effect against SA Objective 4.</p> <p>The site is not located within 400m of bus stops or 800m of a train station, and as such development is likely to increase the need to travel by car to access new employment opportunities on site unless appropriate mitigation is put in place, it is considered at this stage that there is the potential for major negative effect against SA Objective 5a. The site is however located within 400m of a PRoW and cycle route with the potential for a major positive effect against SA Objective 5b.</p> <p>It is unknown at this stage whether there is satisfactory access to the site, however development at this site option has the potential to increase level of traffic in an area that is already experiencing congestion problems (around the M5). Development is likely to exacerbate air quality issues in this area also. Potential for a major negative effect against SA Objectives 6 and 7, with an element of uncertainty until site level details and assessments are completed.</p> <p>The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.</p> <p>The site contains and lies adjacent to Deciduous Woodland Priority Habitat, around the northern and southern site boundaries. The Cheltenham Local Plan can, through appropriate policy wording; ensure that development retains the existing Priority Habitat on site, and support habitat enhancement on site. As such, it is considered that there is the potential for a minor positive effect against SA Objective 10 with an element of uncertainty until policy mitigation and site level assessments have been completed.</p>																	

The site was not assessed in the GCT JCS Landscape Sensitivity Study³³⁴, and it is not located within or adjacent to the AONB. The site is entirely greenfield land and contains trees and hedgerows. It is considered that there is the potential for a minor long-term negative effect on landscapes (SA Objective 11a) through development in a previously undeveloped area. Any development proposal for the site should seek to retain the existing trees and hedgerows where possible. As the site is greenfield land it is also considered to have the potential for a minor negative effect on land and soils (SA Objective 14). The site is located predominantly within the Green Belt with the potential for a major negative effect against SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

³³⁴ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

NEW SITES: October 2017

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
Land off Oakhurst Rise	++	0	+	+	+	+	+	-	0	0	+	+	-	+	-	?	-

Summary:

The council has identified that the site option will provide 100 new dwellings with a potential major long-term positive effect on SA objective 1. No employment land is being proposed at the site option, and none will be lost as a result of development, with a neutral effect on SA Objective 2a. The site option is within 800m of an existing employment area, with a minor positive effect on SA Objective 2b.

The site option is not within a Cordon Sanitaire area, and will not result in the loss of existing public green space. The site is adjacent to St Edwards preparatory School and residential development, with no conflicting neighbouring land uses. The site option is approx. 200m from Queen Elizabeth II Playing Field, which will promote healthier lifestyles with an associated long-term minor positive effect on health. Approx. 400m to the south of the site option is the A40/London Road, along which there is a range of services/facilities. These include shops, pubs, restaurants, a GP surgery, a dentist surgery and a pharmacy. The site option is adjacent to a school, and within 800m of a second primary school. Therefore, the site option is considered to have a minor positive effect on access to services/facilities.

The site is located within 400m of a bus stop, which can contribute to a reduced reliance on the private vehicle. Services from the bus stop are hourly or more frequent, with a range of destinations, making the use of bus services more appealing for residents. The site option has good footpath access to local services/facilities and is within 400m of the nearest PRow. The creation of new cycle route connections within this area of the Borough could significantly enhance the identified positive effects.

There is vehicle access to the site via Oakhurst Rise. A short distance to the south of Oakhurst Rise there is access to the A40. The site option will result in an increase on traffic on the local road network, and in an area where localised congestion is a problem (around the A40), with a potential minor negative effect. The whole of Cheltenham has been designated as an Air Quality Management Area, and the site option will result in an increase in emissions due to the likely increase in private vehicle use. However, the good access to sustainable transport links and mitigation and services/facilities, with additional mitigation provided through the GCT JCS and the Draft Cheltenham Local Plan will likely result in a neutral effect.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones, Groundwater Vulnerability Zones or Water Protection Zones; development therefore has the potential for a neutral effect against SA Objective 8. The site option is entirely located within Flood Zone 1, with a low probability of flooding and a minor positive effect.

The site option is located approx. 8km north of the Cotswolds Beechwoods SAC, which is designated for its beech forests and semi-natural dry grasslands³³⁵. The site does not contain any designated biodiversity, however the south west corner of the site is adjacent to an area of Deciduous Woodland Priority Habitat. The site is also greenfield land. The Cheltenham Local Plan can, through appropriate policy wording; ensure that development retains the existing Priority Habitat on site, and support habitat enhancement on site. As such, it is considered that there is the potential for a minor positive effect against SA Objective 10 with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site was not assessed in the GCT JCS Landscape Sensitivity Study³³⁶, however it is greenfield land located and is approx. 100m from the Cotswolds AONB, such that development here would likely have a negative effect on the setting of the AONB. Furthermore, the loss of greenfield land will have minor negative effect on landscape and SA Objective 11a. The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

There are 3 Listed Buildings adjacent to the site option to the south, and 1 Listed Building adjacent to the east. Therefore, development at the site option has the potential for a negative effect on the setting of the designated heritage assets, and therefore a minor negative effect is considered for SA objective 12.

The site option does not contain any best or most versatile agricultural land (grade 1 to 3a), however as the site is greenfield it is considered to have a minor negative effect on soils.

³³⁵ DEFRA (2016) Magic Map Application

³³⁶ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
Lansdown Industrial Estate	++	0?	++	+	+	++	+	-?	-	-	0	+	+	+	0	?	+

Summary:

The council has identified that the site option will provide approx. 180 new dwellings with a potential major long-term positive effect on SA objective 1. The site option is existing employment land, however indicative proposals suggest only part of the site will be used for housing, and the other part will see employment use renovated and intensified, with no net loss of jobs. Therefore, a neutral effect with some uncertainty at this stage of assessment is considered for 2a. The site option is within 400m of an existing employment area, with a major positive effect on SA Objective 2b.

The site option is adjacent to a railway line, with the potential for negative effects on health through noise levels. However, it is considered that Local Plan policy provides sufficient mitigation and that appropriate design can ensure noise pollution does not result in negative effects on health. The site is within 300m of existing public open space which will promote healthier lifestyles, with a long-term minor positive effect.

The site option is within 800m of most services/facilities, which will reduce the need for residents to use private vehicles to access services/facilities, with a minor positive effect. The site option is within 400m of a bus stop and 800m of a train station, with major positive effects on SA objective 5a as this will promote the use of public transport and reduce the reliance on private vehicles. The site option is also within 400m of a strategic cycle path, with a minor positive effect.

The site option has satisfactory access to the existing road network, however the site option will result in an increase on private vehicles on the local road network, although this increase will be reduced as there are good sustainable transport links. Potential for a minor negative effect with some uncertainty at this stage of assessment. The site will also result in an increase in traffic within an AQMA, with a minor negative effect.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones or Water Protection Zones. However, the northern area of the site option is within a minor aquifer with a high vulnerability, and therefore there is the potential for a minor negative effect on water resources. The site is not located within an area of flood risk; development at this site therefore has the potential for a minor positive effect against SA Objective 9.

The site option is approx. 8km to the north of the Cotswold Beechwoods SAC, which is designated for its beech forests and semi-natural dry grasslands³³⁷. The site option does not contain and is not located adjacent to any Priority Habitat. The site option is approx. 500m from Griffiths Avenue Local Nature Reserve, and 130m from an unnamed Local Nature Reserve, located along the Honeybourne Line cycle path. However, JCS and Cheltenham Local Plan policy will protect local biodiversity such that the site option will not have a significant effect on the designated sites in close proximity. Brownfield land is considered to have the potential to support a large amount of biodiversity³³⁸, and the Cheltenham Local Plan can support the appropriate assessment of biodiversity value on brownfield sites, as well as retention of important habitats and enhancement of features,

through appropriate policy wording. Given the site's current use, it is considered that there are potential opportunities to enhance biodiversity on site, with a minor positive effect.

The site was not assessed in the GCT JCS Landscape Sensitivity Study³³⁹, and it is not located within or adjacent to the AONB. The site is entirely brownfield land with a minor positive effect on SA Objective 11a. The site option is not located within the Green Belt, with a minor positive effect on SA Objective 11b.

The site does not contain, and is not located adjacent to any designated or non-designated heritage assets. Development at the site is also considered unlikely to affect the setting of designated and non-designated heritage assets in the wider area. Potential for a neutral effect against SA Objective 12.

The site option is brownfield and will not hinder access to minerals, with a minor positive effect.

³³⁷ DEFRA (2016) Magic Map Application

³³⁸ JNCC (2014) http://jncc.defra.gov.uk/pdf/UKBAP_BiodiversityNews-63.pdf

³³⁹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

Site Option	SA Objective																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14			
Leckhampton	++	0	+	+	+	+	+	-	-	0	+	+	0	+	0	?	-

Summary:

The council has identified that the site option will provide approx. new housing with a potential major long-term positive effect on SA objective 1. No employment land is being proposed at the site option, and none will be lost as a result of development, with a neutral effect on SA Objective 2a. The site is located within 800m of an existing employment area with the potential for a major negative effect against SA Objective 2b.

The site does not have any conflicting neighbouring land uses, and the site option is within walking distance existing public open space which will promote healthier lifestyles, with potential long-term minor positive effects on SA Objective 3. The site option is within 800m of a number of key services/facilities, which includes a GP surgery, a primary school, a Post Office and pubs/restaurants. There are no significant barriers to movement, and footpaths are available. Overall minor positive effect.

The site option is adjacent to bus stops on the A46 which provide regular services to Cheltenham and Lower Tuffley, with positive effects on SA Objective 5a. There is a PRow route through the site option and additional routes in the surrounding landscape, with minor positive effects on sustainable transport.

The site option is considered likely to result in an increase in traffic on the local road network, but there is good access to the road network as the site is adjacent to the A46. The whole of Cheltenham has been designated as an Air Quality Management Area, and the site option will result in an increase in emissions due to the likely increase in private vehicle use. Potential for a minor negative effect on traffic and air quality.

The site does not overlie any Groundwater or Surface Water Safeguard Zones, Groundwater Source Protection Zones or Water Protection Zones. The site is partially within a Groundwater Vulnerability Zone for a minor aquifer (intermediate), however mitigation in the Local Plan is considered sufficient to prevent significant negative effects. Development therefore has the potential for a neutral effect against SA Objective 8.

There is a small area of Flood Zone 2 at the northern boundary of the site option, however development could avoid this with no significant effects likely, with an overall minor positive effect.

The site option is approx. 6km from the Cotswold Beechwoods SAC, which is designated for its beech forests and semi-natural dry grasslands³⁴⁰. There is a small area of Deciduous Woodland Priority Habitat in the south of the site option, and development here could therefore result in the loss or fragmentation of this habitat. The site is also greenfield land. The Cheltenham Local Plan can support habitat enhancement on site through appropriate policy wording. As such, it is considered that there is the potential for a minor positive effect against SA Objective 10 with an element of uncertainty until policy mitigation and site level assessments have been completed.

This site was assessed in the GCT JCS Landscape Sensitivity Study³⁴¹ and is considered to have a medium-high landscape sensitivity. The site option is also approx. 700m from the Cotswolds AONB, and is greenfield land. The site option is an important green/rural buffer between the urban settlement and the AONB and has a high doorstep amenity value. However, landscape mitigation provided in the GCT JCS and the Cheltenham Local Plan provides mitigation that will protect the designated AONB and ensure the design of development is sensitive to the landscape character. Therefore there is the potential for a residual neutral effect on the landscape as a result of development at the site option. The site is not located within the Green Belt with the potential for a minor positive effect against SA Objective 11b.

The site option does not contain any designated heritage assets. The nearest Listed Building to the site option is approx. 200m away, however it is expected that existing screening will prevent significant negative effects on the heritage asset. Overall potential for a neutral effect against SA Objective 12.

The site option contains Grade 2 & 3a best and most versatile agricultural land, with a minor negative effect on soil resources. The site option will not hinder access to minerals.

³⁴⁰ DEFRA (2016) Magic Map Application

³⁴¹ GCT (2013) JCS Landscape Characterisation Assessment and Sensitivity Analysis [online] <http://www.gct-jcs.org/Documents/EvidenceBase/Final-JCS-Master-Landscape-Characterisation-Assessment-and-Sensitivity-Analysis.pdf>

**Cheltenham Local Plan
Regulation 19 Consultation
Integrated (Sustainability) Appraisal Report:**

**EQUALITY AND DIVERSITY IMPACT ASSESSMENT
SCREENING REPORT**

November 2017

enfusion



**EQUALITY AND DIVERSITY IMPACT ASSESSMENT
SCREENING REPORT**

**Cheltenham Local Plan Regulation 19 Consultation
Integrated (Sustainability) Appraisal Report**

<i>date:</i>	October 2016 v01 LPP1 Regulation 18 Consultation November 2017 v02 Local Plan Regulation 19 Consultation	
<i>prepared for:</i>	Cheltenham Borough Council	
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1.0 Introduction

- 1.1 The Report sets out the process and results of a screening assessment for an Equality and Diversity Impact Assessment (EqIA) of the Cheltenham Plan. The Cheltenham Plan sets out the spatial Vision, Objectives, Policies and Site Allocations to guide development in the Cheltenham Borough area. Enfusion Ltd has been commissioned to carry out the screening view on behalf of the Council and as part of the Integrated (Sustainability) Appraisal (IA) of the emerging Cheltenham Plan. An initial EqIA was undertaken of the Local Plan Part One and subject to consultation. The EqIA has been updated following the further development of the Local Plan.

Background

- 1.2 The Cheltenham Plan has been prepared to comply with national planning policy guidance using a range of evidence and taking into account responses made to previous consultation. It is based on research into the characteristics of the Borough area, relationships with adjoining areas, past trends and future predictions.
- 1.3 Under the Equality Act 2010, public authorities such as Cheltenham Borough Council must in the exercise of their functions, have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by or under the Act.
 - Advance equality of opportunity between people who share a characteristic and those who do not share a characteristic.
 - Foster good relations between people who share a characteristic and those who do not share a characteristic.
- 1.4 An EqIA is a tool which seeks to improve the work of the Council and ensure that they meet the requirement of the Equality Act 2010.
- 1.5 It is important to note that assessment of equality, diversity, and health/well-being (which is an important aspect of equality) has been detailed through the IA process. All aspects of the emerging Cheltenham Plan have been appraised against a SA framework including several SA objectives that directly and indirectly address equality, health and diversity and these include: No.1- Housing, No.2 - Economy & Employment, No.3 – Inequalities and Healthy Lifestyles, No.4 – Accessibility (to services and facilities), No.5 – Sustainable Transport, No. 11 – Townscape, No.12 Historic Heritage, and No.13 - Distinctiveness. The findings of this EqIA have been integrated into the IA of the Draft Cheltenham LP and are provided separately as Appendix VIII to the IA Report.

Consultation

- 1.6 The initial EqIA Screening Report was published for consideration alongside the Draft IA Report and the Draft Cheltenham Borough Local Plan Part 1 for public consultation during February to March 2017. No comments were received on the EqIA Report. This updated EqIA Report is also provided alongside the Cheltenham Plan for Regulation 19 consultation.

Purpose and Structure of Report

- 1.7 The purpose of this Screening Report is to determine whether the Cheltenham Plan is likely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and whether a full EqIA is required.
- 1.8 This report is structured to demonstrate compliance with the requirements of the Equality Act. Following this introductory section, the Report is organised into three further sections:
- **Section 2** - summarises the requirements of the Equality Act 2010 and the purpose of EqIA.
 - **Section 3** - outlines the Screening process and the findings of the screening assessment.
 - **Section 4** - summarises the findings of the EqIA and sets out the next steps, including consultation arrangements.

2.0 Equality and Diversity Impact Assessment: Equality Act 2010 Requirements

- 2.1 The Equality Act (2010) came into effect in October 2010 with the aim of harmonising all current discrimination law and strengthening the laws that prevent discrimination. The Equality Act applies to the provision of services and public functions and includes the development of Council policies and plans. The Act maintains the protection provided by previous legislation and therefore prevents discrimination on the basis of nine protected characteristics (previously referred to as equality strands): age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
- 2.2 Inequality can exist in a number of forms and where land use planning is concerned, this can include inadequate provision of and access to services (health, food stores, education facilities), good quality homes, employment opportunities, a healthy living environment and transport infrastructure (roads, pavements, public transport) for all members of society.
- 2.3 In summary, public authorities must in the exercise of their functions, have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by or under the Act.
 - Advance equality of opportunity between people who share a characteristic and those who do not share a characteristic.
 - Foster good relations between people who share a characteristic and those who do not share a characteristic.
- 2.4 The Equality Act 2010 does not specify how public authorities should analyse the effects of their existing or new policies in relation to equality, but doing so is an important part of complying with the general duty. The approach in this Report reflects the principles of the Equality Framework for Local Government¹, as applied across Gloucester, Cheltenham and Tewkesbury, and other guidance provided by the Department of Health.
- 2.5 An EqIA is a tool which seeks to improve the work of a Council and ensure that the policies and plans it develops do not discriminate in the way they provide services and employment, and that where possible they do all they can to advance equality of opportunity between persons who share a relevant protected characteristic, and persons who do not.

¹ Equality and Human Rights Commission (2009) Equality Impact Assessment Guidance. Online at <http://www.equalityhumanrights.com/about-us/equality-and-diversity/our-assessments-of-impact/>

2.6 The methods and approach used for this assessment involve the following stages - outlined in Table 1. This Report outlines the method and findings for Stage 1 of the assessment - the Screening.

Table 1: Equality and Diversity Impact Assessment: Key Stages	
Stage 1	
Screening for Equality and Diversity Impact Assessment	<ul style="list-style-type: none"> ■ Identify the main purpose and aims of strategy/plan. ■ Identify other plans, programmes and assessments that have influenced the strategy/ plan in relation to equality. ■ Provide baseline information on issues and needs related to each protected characteristic or person. ■ Assess the impacts of the strategy/ plan on the protected characteristics or persons. <p><i>If no negative effects are likely then no further assessment will be required.</i></p> <p><i>If there are effects are judged likely or uncertainty exists which cannot be easily mitigated – the precautionary principle applies proceed to Stage 2</i></p>
Stage 2	
Full Equality and Diversity Impact Assessment	<ul style="list-style-type: none"> ■ Complete additional baseline and research. ■ Agree scope and method with wider [public] stakeholders as necessary. ■ Assess strategy/plan in greater detail. ■ Provide recommendations to mitigate negative impacts. ■ Develop measures to monitor, evaluate and review (including timescale and mechanisms) the recommendations. ■ Report outcomes of EqIA and consult with wider [public] stakeholders as necessary. ■ Finalise EqIA following responses from public and implement.

3.0 Equality and Diversity Impact Assessment Stage 1: Screening

3.1 As detailed previously in Table 1, EqIA typically involves two stages. This Report sets out our approach and findings for Stage 1, to determine whether the Draft Cheltenham Borough Local Plan Part 1 (Cheltenham LP) is likely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and whether a full EqIA is required.

Approach to Equality and Diversity Impact Assessment Screening: Key Tasks

3.2 The process of Screening can be broken down into four main task areas. Each Task is outlined in more detail below.

Task 1: Identify the main purpose and aims of strategy/ plan – This is where a description of the strategy/ plan will be provided. The following questions will be used to set out the information required for this task. The questions are:

- What are the main aims, objectives, purpose and outcomes of the policy and how does it fit in with the wider aims of the organisation?
- Who implements or delivers the policy, service or function?
- Who will be affected by the strategy/ plan?

Task 2: Description of other plans, programmes and policies used to develop the strategy/ plan – This will draw out any relevant documents that have influenced the development of the strategy/ plan in relation to equality.

Task 3: Review baseline data and research – This will involve looking at relevant equalities monitoring data covering the nine protected characteristics or persons from existing databases. Any gaps will be identified.

Task 4: Screening Assessment, recording the view and the supporting information and analysis – This is where the information gained from tasks 1 to 3 is brought together to support the screening view.

The assessment uses a simplified version of the SA/SEA appraisal key applied across the strategy/ plan, with the assessment informed by decision aiding questions:

- Will the policy have a negative impact on any of the protected characteristics or persons?
- How can identified negative impacts be minimised or removed?
- How can identified positive impacts be improved or enhanced?
- Is monitoring of the issues required?

Assessment Key	
+	Positive Effect
-	Negative Effect
0	Neutral Effect
?	Unknown or Uncertain Effect

Task 1: Identify the main purpose and aims of strategy/ plan

What are the main aims objectives purpose and outcomes of the policy and how does it fit in with the wider aims of the organisation?

- 3.3 The Cheltenham Plan sets out the proposed strategy to accommodate development allocated to the Borough from the higher level Gloucester, Cheltenham & Tewkesbury Joint Core Strategy (GCT JCS) up to 2031. When adopted, this document will form a key part of the development plan for Cheltenham Borough, and alongside the GCT JCS, will be used to guide decision-making on planning applications.
- 3.4 The higher level planning document the GCT JCS has also been subject to EqIA Screening during its preparation. The Screening Report², September 2013, concluded that all of the components of the Submission JCS will lead to positive effects on the protected characteristics with no negative effects being identified. The JCS includes Strategic Objective No. 9 to promote healthy communities and this includes reducing inequalities. The Cheltenham Plan has been prepared to be in conformity with the JCS, including compliance with equality requirements.
- 3.5 The Cheltenham Plan sets out how Borough will deliver its housing and employment needs, and includes a strategic objective to reduce social isolation. The Draft Cheltenham Plan includes a Vision in three parts, with each part supported by a number of Objectives to help deliver the Vision. The proposed Vision and the Objectives in the Draft Cheltenham Plan are as follows:

Vision Theme A:

Cheltenham is a place where people live in strong, safe, healthy, well-served and well-connected communities

Objectives Theme A:

- a) Recognise the local distinctiveness of Cheltenham's various neighbourhoods and deliver regeneration where appropriate;
- b) Ensure provision of sufficient housing land and other opportunities for residential development that meets the needs of the current and future population of the Borough;
- c) Understand what people need from the places where they live and work to help create socially sustainable communities via local models;
- d) Ensure that new communities are integrated with neighbouring communities to promote cohesion and reduce social isolation;

² <http://www.gct-jcs.org/Documents/SustainabilityAppraisal/SA-Appendix-10-EqIA-Screening-Report2013.pdf>

- e) Enable investment in schools, healthcare and other community facilities and meeting places in order to support new and existing communities;
- f) Increase opportunities for sport and active leisure, particularly in areas of under-provision;
- g) Design places that are accessible to all and where barriers to walking and cycling are removed so that active travel and public transport are the default choices;
- h) Support a network of neighbourhood centres that provide an appropriate range of local amenities to support sustainable communities;
- i) Ensure that new development protects public safety and amenity and creates environments that contribute to reducing crime and fear of crime; and
- j) Improve health outcomes by promoting and prioritising active travel

Vision Theme B:

Cheltenham is a place with a prosperous and enterprising economy where education and employment opportunities are increasing and diversifying, where businesses choose to invest and where the benefits are felt by all.

Objectives Theme B:

- a) Ensure provision of sufficient employment land and other opportunities for economic development to attract new businesses and to enable existing businesses to grow and develop within Cheltenham;
- b) Promote the development of adaptable and flexible employment space within Cheltenham so that sites and buildings can be re-used with minimal environmental impact;
- c) Assist in developing and maintaining an attractive retail offer in the town centre and other designated centres;
- d) Deliver a range of sustainable transport choices through appropriate infrastructure improvements including better cross-town and local links, prioritised junctions, and improved public transport;
- e) Encourage knowledge-intensive services businesses in high value sectors; and
- f) Support development of Cheltenham's educational facilities to ensure that the young people have access to a wide range of opportunities.

Vision Theme C:

Cheltenham is a place where the quality and sustainability of our cultural assets and natural and built environment are valued and recognised locally, nationally and internationally and tourists choose to visit and return to.

Objectives Theme C:

- a) Conserve and enhance Cheltenham's architectural, townscape and landscape heritage, particularly within the town's conservation areas;
- b) Conserve, manage and enhance Cheltenham's natural environment and biodiversity;
- c) Support development of Cheltenham's sporting, cultural, arts and tourism infrastructure (including public art) to ensure that the Borough maintains its reputation as a cultural destination and continues to be an attractive place to visit;
- d) Address the challenge of climate change, ensuring that development meets high design and sustainability standards and is built to be adaptable over the long term;
- e) Improve pedestrian and cycle permeability throughout the town by creating a network of convenient routes which include multifunctional green spaces that link with the wider countryside, attractive and safe streets and spaces, and measures which reduce the visual and environmental impact of vehicular traffic;
- f) Support provision, maintenance and continued investment in a high quality public and private realm, including formal and informal green spaces and private gardens that contribute to local amenity and wildlife biodiversity; and
- g) Manage and reduce the risk of flooding within the Borough.

3.6 The Cheltenham Plan proposes new development in order to deliver the scale and distribution proposed in Policies SP1 and SP2 of the Joint Core Strategy insofar as they relate to the need for development in Cheltenham Borough outside the strategic allocations proposed in the JCS. The GCT JCS identifies 10,917 new dwellings to meet Cheltenham's needs. As Cheltenham is unable to meet its objectively assessed needs, the GCT JCS seeks to deliver a proportion of Cheltenham's required growth through strategic allocations / urban extensions proposed in the JCS. The Cheltenham Plan seeks to allocate the remaining need through local sites within the Borough boundary.

3.7 The Cheltenham Plan includes Policies that set out the local requirements that development in the Cheltenham administrative area will have to meet. A list of the Proposed Policies is provided below:

Economy & Employment EM1-6
Design Requirements D1-3
Green Belt GB1-2
Landscape L1
Historic Environment HE1-5
Housing H1-2
Housing Mix and Standards HM1-5
Gypsies, Travellers & Travelling Showpeople GT1
Health & Environmental Quality

Access to the Transport Network TN1-2
Green Infrastructure GI1-3
Social & Community Infrastructure CI1-4

Who implements or delivers the policy, service or function?

- 3.8 Cheltenham Borough Council is responsible for implementing the Cheltenham Plan. The Cheltenham Plan is subject to consultation with wider (public) stakeholders who can influence the policies in the Cheltenham Plan.

Who will be affected by the strategy/ plan?

- 3.9 The Cheltenham Plan applies to the administrative area of Cheltenham Borough Council. It will affect everyone who lives, works and visits these areas.

Task 2: Description of other plans, programmes and assessments used to develop the strategy/ plan

- 3.10 Appendix I provides a summary of the plans, programmes and the policies that have influenced the GCT JCS and the Cheltenham Plan in relation to equality. They include:

National

- National Planning Policy Framework (NPPF) (2012)
- Strong and Prosperous Communities White Paper 2006
- Our Shared Future, 2007 (Commission On Integration and Cohesion)
- Planning Policy for Traveller Sites (2015)
- Community Infrastructure Levy (Amended) (2015)
- Lifetime Homes, Lifetime Neighbourhoods - A National Strategy for Housing in an Ageing Society 2008
- Sustainable Communities: A Shared Agenda, A Share of the Action. A guide for Local Authorities 2007
- Healthy Lives, Healthy people: Our Strategy for Public Health in England

Regional/Sub-regional

- Leadership Gloucestershire
- Gloucestershire Health and Wellbeing Strategy 2012 – 2032 – Fit for the Future
- Your Health, Your Care – The Five-year Vision for Health and Social Care
- The Children & Young People's Partnership Plan 2015 – 2018 (CYPPP)

Local

- Cheltenham Borough Council Housing and Homelessness Strategy 2012 – 2017

- Our Future, Our Choice, Cheltenham's Sustainable Community Strategy 2008 - 2011
- Tewkesbury Borough Council Housing and Homelessness Strategy 2012 – 2016
- The Sustainable Community Strategy for Tewkesbury Borough 2008 – 2028 (Refreshed November 2010)
- Gloucester's Cultural Vision & Strategy 2016-2026
- Gloucester City Vision 2012 – 2022
- Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) Sustainability Appraisal incorporating Strategic Environmental Assessment (SA/SEA) 2014

Task 3: Review baseline data and research

- 3.11 The baseline was sourced from Gloucestershire Equality Profile 2016 (Gloucestershire County Council, 2013) which is available online at <http://www.inform.gloucestershire.gov.uk>.
- 3.12 Given that these statistics have been collated to cover the nine protected characteristics or persons based on the most up-to-date information available under the Equality Act 2010, there are not considered to be any gaps in the data.
- 3.13 The following table summarises the equality and diversity trends in Gloucester, Cheltenham and Tewkesbury areas from the Gloucestershire Population Profile 2016:
- **Age** – Cheltenham and Tewkesbury have a lower population of 0-19 year olds than the national average and Gloucester's population in this age group is higher than the other two Councils. In addition, Tewkesbury has a much higher population aged 65+ than Cheltenham. At 24.9% Gloucester has the highest representation of children and young people and exceeds the county and national average Gloucester and the national average. All the Local Authorities are moving towards an ageing population demographic.
 - **Marriage and civil partnership** – Gloucester and Tewkesbury has a lower proportion of people who are single or separated when compared to the national average. Cheltenham has the highest proportion of single people and exceeds the county and national average. In contrast the proportion of people who are married, divorced or widowed in Tewkesbury exceeds the national average.
 - **Pregnancy and maternity** – Cheltenham has the highest proportion of births to mothers aged between 30 and 34, exceeding the county and the national average. Cheltenham is also below the county and national average with regards to birth to mothers aged under 20.
 - **Race** – The majority of Gloucester's, Cheltenham's and Tewkesbury's population is white. Black or Ethnic Minorities make up a very small percentage of their populations, which is considerably lower than reported for England as a whole. Gloucester has the

highest proportion of Black or Ethnic Minorities compared to the other Councils. The proportion of people that are classified as Other White is higher in Cheltenham than England as a whole. The proportion of people that are classified as Caribbean and White and Black Caribbean is higher in Gloucester than England. Tewkesbury Borough has a large number of Gypsy, Travellers and Travelling Showpeople compared with other districts in Gloucestershire.

- **Religion or belief** - Gloucester and Tewkesbury have a much higher proportion of Christians in their populations than the national average. Cheltenham has the highest proportion of Buddhists, Hindus and people who have no religion and Gloucester has the highest proportion of Muslims out of the three Councils.
- **Gender reassignment** - There are no official estimates of gender reassignment at either national or local level. However, in a study funded by the Home Office, the Gender Identity Research and Education Society estimate that somewhere between 0.6% and 1% of the UK's adult population are experiencing some degree of gender variance. This figure has been applied to all three Councils.
- **Sexual Orientation** - Estimates from the ONS Integrated Household Survey suggests that nationally Lesbian, Gay and Bisexuals represent 1.6% of people aged 16 and over. Again, this percentage was applied to all three Councils.
- **Sex** – Gloucester, Cheltenham and Tewkesbury have a slightly higher percentage of women to men in their populations than the national average.
- **Disability** - Gloucester, Cheltenham and Tewkesbury all have a lower percentage of their populations with long term limiting illness or disability than the national average.

Task 4: Screening Assessment, recording the view and the supporting information and analysis

- 3.14 The development of the GCT JCS and the Cheltenham Plan have been influenced by a number of other plans, programmes and assessments relating to the protected characteristics or persons under the Equality Act 2010. Furthermore, the adopted GCT JCS includes an objective that specifically relates to addressing social inequality and inclusivity, and providing for healthier and safer communities; the Cheltenham Plan has been prepared in the context of this higher-level plan.
- 3.15 The draft Vision, Objectives, and the Policies have been assessed to the same level of detail, taking into account the information gathered in Task 3 to establish any potential impacts on the protected characteristics or persons identified under the Equality Act 2010. The full assessment is contained in Appendix II.
- 3.16 A summary of the assessment for each component of the Cheltenham Plan is provided below under each component heading.

Vision

- 3.17 The Vision is considered to lead to positive effects on all protected characteristics. It should benefit all groups as it aspires to be a place where a good quality of life is open to all. The aim for supporting health and happy communities will have positive effects on all groups improving their quality of life and meeting the needs of each group's distinctive and individual needs.

Objectives

- 3.18 Generally, the Objectives will have a positive effect on all protected characteristics. In particular, 'Recognise the local distinctiveness of Cheltenham's various neighbourhoods', 'Understand what people need from the places where they live', 'Ensure provision of sufficient housing land', 'Ensure provision of sufficient employment land', 'Address the challenge of climate change', 'Manage and reduce the risk of flooding' and 'Ensure that new communities are integrated with neighbouring communities to promote cohesion and reduce social isolation' will have greater positive effects on all social groups by improving accessibility, providing buildings which will meet their needs and be of a good quality and also providing flexible and adaptable buildings and places that are resilient to climate change and flooding. None of the Objectives are biased towards one particular protected characteristic.

Cheltenham Plan Policies

- 3.19 Policies in the Cheltenham Plan seek to ensure that all people (including protected groups) in the Cheltenham Plan area will have a high-quality environment in which to live, work, learn and socialise.
- 3.20 Of particular importance to the protected characteristics are the Policies H1-2, EM1-6 and CI 1-4 which deliver housing, employment and supporting infrastructure, particularly open space, which will meet the needs of the all and are accessible to all. Higher level policies contained within the adopted GCT JCS and the Cheltenham Plan Policies such as SL1 seek to ensure that these places are safe, vibrant, healthy and inclusive. Policies specifically concerned with health and recreation such as G1-3 will have positive effects on the protected characteristics. Policies on employment will support health and equality aims since health/well-being is closely linked with having a job.
- 3.21 The Screening Assessment has not made any suggestions for enhancements to strengthen the Cheltenham Plan and increase the certainty of the positive effects identified for all protected characteristics. The assessment found that the all of the components of the plan will lead to positive effects on the protected characteristics with no negative effects being identified.

Monitoring

- 3.22 Gloucestershire County Council each year publishes a number of equality progress reports demonstrating how the Council advances equality, eliminates discrimination and fosters good. Cheltenham Borough Council is also required to prepare a Monitoring Report which includes consideration of equality, health and diversity.
- 3.23 The adopted GCT JCS provides a separate monitoring framework that sets out key indicators and contingencies that are critical to ensure the successful delivery of the plan. These indicators and contingencies are attached to the strategic objectives and policy targets of the plan and directly and indirectly relate to equality, health and diversity. It will also be reviewed on an annual basis. Therefore, further monitoring regarding equality is not considered to be required.

4.0 Summary and Conclusions

- 4.1 The Cheltenham Plan sets out the proposed approach to accommodating development in the Cheltenham Borough administrative area. This has been allocated according to need from the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy for the period up to 2031.
- 4.2 The development of the Cheltenham Plan has been influenced by a number of other plans, programmes and assessments relating to the protected characteristics or persons under the Equality Act 2010.
- 4.3 The Vision, Objectives, and Policies have been assessed to the same level of detail, taking into account the baseline information gathered to establish any potential impacts on the protected characteristics or persons identified under the Equality Act 2010. The assessment found that the all of the components of the plan will lead to positive effects on the protected characteristics with no negative effects being identified.
- 4.4 A number of reports are already produced on an annual basis which include consideration of equality, health and diversity within the JCS area. Therefore, further monitoring regarding equality and diversity is not considered to be required.
- 4.5 The assessment has found that the Cheltenham Plan is unlikely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and as a result a full EqIA will not be required.
- 4.6 Initial findings were subject to consultation from wider stakeholders alongside the Draft Cheltenham Borough Local Plan (Part One Preferred Options, October 2016) Integrated (Sustainability) Appraisal Report. No comments were received on the EqIA.
- 4.7 Overall, the proposed policies in the Regulation 19 Cheltenham Plan help to confirm the compatibility with aims for equality by confirming the approach proposed in the Preferred Options Plan and confirming the likely positive effects. Policies on housing and employment land are confirmed; this includes Policy GT1 for gypsies and travellers with major positive effects for this distinct ethnic group. Policies HM1 & 2 recognise the particular needs for students and the elderly respectively – confirming positive effects. Thus, the further development of the Cheltenham Plan (Regulation 19, 2017) remains unlikely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and as a result a full EqIA will not be required.

Appendix I of Appendix VIII: Cheltenham Borough Local Plan Part 1 Equality and Diversity Impact Assessment - Plans, Programmes and Assessments

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
Strong and Prosperous Communities White Paper 2006	The aim of this White Paper is to give local people and local communities more influence and power to improve their lives. It is about creating strong, prosperous communities and delivering better public services through a rebalancing of the relationship between central government, local government and local people.	There will be around 35 priorities for each area, tailored to local needs through Local Area Agreements. Instead of the many hundreds of indicators currently required by central government there will be a single set of about 200 outcome based indicators covering all important national priorities like climate change, social exclusion and anti-social behaviour. This indicator set will include citizen satisfaction and perception measures; and citizens and communities everywhere will be able to examine performance against the indicators to know how well their local area is doing.
Our Shared Future, 2007 (Commission On Integration and Cohesion)	Our Shared Future sets out our practical proposals for building integration and cohesion at a local level.	<ul style="list-style-type: none"> • Sense of shared futures • Emphasis on a new model of rights and responsibilities • New emphasis on mutual respect and civility • Deliver a visible social justice
Community Infrastructure Levy (Amended) (2015)	Provides system to fund new local infrastructure through new development. CIL is a charge that will be payable by developers when they begin construction of new developments	Confirms the funding method for delivery of major aspects of the infrastructure requirements for development.
Healthy lives, healthy people: our strategy for public health in England (2010)	This White Paper sets out the Government's long-term vision for the future of public health in England. The aim is to create a 'wellness' service (Public Health England) and to strengthen both national and local leadership.	The goal is a public health service that achieves excellent results, unleashing innovation and liberating professional leadership. This White Paper builds on Equity and Excellence: Liberating the NHS to set out the overall principles and framework for making this happen.
National Planning Policy Framework (NPPF) (2012)	The national planning policy framework aims to reform the planning system to	Local Plans should set out strategic priorities to deliver: <ul style="list-style-type: none"> ■ To deliver a mix of housing based on current and future demographic

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
	<p>make it less complex and more accessible, and to promote sustainable growth. The NPPF streamlines existing Planning Policy Statements, Planning Policy Guidance Notes and circulars to form a single consolidated document which promotes sustainable development. It provides a framework within which local people and authorities can produce local and neighbourhood plans.</p>	<p>trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);</p> <ul style="list-style-type: none"> ■ Consider the needs of people with disabilities by all modes of transport.
<p>Planning for Travellers 2015</p>	<p>The document sets out the proposed new, single Planning Policy for traveller sites.</p>	<p>The new policy aims to:</p> <ul style="list-style-type: none"> ■ enable local planning authorities to make their own assessment to set their own pitch/plot targets ■ encourage local planning authorities to plan for sites over a reasonable timescale ■ protect Green Belt from development ■ reduce tensions between settled and traveller communities in the planning system ■ remove repetition of national planning policy that is set out elsewhere ■ remove unjustified differences in policy in the two circulars, and between the two circulars and other policy statements ■ remove unnecessary guidance and context so that planning policy documents contain only policy ■ ensure that local planning authorities, working together, have fair and effective strategies to meet need through the identification of land for sites ■ promote more private traveller site provision while recognising that there will always be those travellers who cannot provide their own sites ■ reduce the number of unauthorised developments and encampments and make enforcement more effective if local planning authorities have had regard to this policy

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
		<ul style="list-style-type: none"> ▪ ensure that the development plan includes fair, realistic and inclusive policies increase the number of traveller sites, in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply ▪ reduce tensions between settled and traveller communities in plan making and planning decisions ▪ enable provision of suitable accommodation from which travellers can access education, health, and welfare and employment infrastructure.
Lifetime Homes, Lifetime Neighbourhoods - A National Strategy for Housing in an Ageing Society 2008	This strategy sets out the Governments' response to the global challenge of ageing. It also outlines plans for making sure that there is enough appropriate housing available in future to relieve the forecasted unsustainable pressures on homes, health and social care services.	The vision is to prepare communities for the multiple changes that they will face; to 'future proof' society so that it does not alienate or exclude; and to allow everybody, regardless of age, to participate and enjoy their home and their environment for as long as possible. To succeed in providing appropriate housing and effective care to all in a more targeted manner, there must be a coherent, joined-up, plan – that is why we need a National Strategy for Housing in an Ageing Society.
Sustainable Communities: A Shared Agenda, A Share of the Action. A guide for Local Authorities 2007	This guide shows how local outcomes such as those reflected in the seven shared priorities, can be delivered in a way that helps create genuinely sustainable communities. It highlights the cross-cutting issues which need to be addressed for each outcome.	<p>7 Shared Priorities:</p> <ul style="list-style-type: none"> ▪ Creating safer and stronger communities ▪ Improving the quality of life of older people and children, young people and families at risk ▪ Meeting transport needs more effectively ▪ Promoting healthier communities and narrowing health inequalities ▪ Promoting the economic vitality of localities ▪ Raising standards across our schools ▪ Transforming the local environment
Gloucester's Cultural Vision & Strategy 2016-2026	This paper aims to promote Gloucester as a cultural hub and encourage local leaders and communities to transform the city. The paper outlines the positive impacts increased diverse cultural activity will have on the local areas economy and community regeneration.	<p>Objective 1- Develop artists and arts organisations</p> <p>Objective 2- Broaden the cultural offer</p> <p>Objective 3- Develop a vibrant city centre</p> <p>Objective 4- Develop audiences</p> <p>Objective 5- Put Gloucester on the cultural map</p> <p>Objective 6- Make things happen</p>
Leadership Gloucestershire	Leadership Gloucestershire (LG) brings together public sector organisations	

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
	<p>which allocate and spend significant resources in Gloucestershire. Its role is to provide vision, leadership and strategic direction in those areas where it is vital for organisations to work together to meet the needs of the people and communities of Gloucestershire in the most cost effective way. LG will work together to reduce current costs, minimise future costs and deliver better outcomes for the benefit of the people of Gloucestershire. They will work with others to achieve their objectives.</p>	<ul style="list-style-type: none"> ■ Gloucestershire Health & Wellbeing Board - To oversee the effective functioning of the Gloucestershire Health and Wellbeing Board ■ Driving economic Growth - To work with the Gloucestershire Local Enterprise Partnership (LEP) to ensure they lead and champion the economic growth agenda. ■ Police and Crime - To maintain oversight of police and crime issues, recognising the roles of the new Independent Police and Crime Commissioner and the Police and Crime Panel as scrutiny body. ■ Planning and Infrastructure - The adoption of a "Gloucestershire family" approach to planning and infrastructure development. ■ Assets - The development of a "One Gloucestershire" approach to assets/estates. ■ Shared Services - To oversee the public sector approach to shared services. ■ Troubled Families/Community Budgets - To oversee the development of the Troubled Families/Community Budget initiatives. ■ Promoting Gloucestershire - To promote Gloucestershire and the agreed priorities.
<p>The Sustainable Community Strategy for Tewkesbury Borough 2008 – 2028 (Refreshed November 2010)</p>	<p>The original strategy was developed by the Tewkesbury Borough Local Strategic Partnership which brings together key agencies, organisations and partnerships from the public, private, community and voluntary sectors.</p> <p>The Sustainable Community Strategy plays an important role in providing the long term vision which takes into account these challenges whilst continuing to deliver our local communities priorities</p>	<p>Vision: A Borough of healthy, strong, thriving and sustainable communities, both rural and urban, where people want to live, work and visit.</p> <ul style="list-style-type: none"> ● Ambition 1: A Thriving Economy ● Ambition 2: A Healthy, Safe & Inclusive Community ● Ambition 3: A Sustainable Natural & Built Environment

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
Gloucester City Vision 2012 - 2022	The Gloucester City Vision 2012- 2022 document sets out what we want to achieve for the City over the next ten years. The City Vision lays out our key strategic priorities for the City which all public, private and voluntary sector partners will aspire to deliver. The City Vision will provide an overarching framework for all partner's strategic plans including important City Council documents such as the Joint Core Strategy and the Gloucester City Plan.	Gloucester will be a flourishing, modern and ambitious City, which all residents can enjoy. Aims: <ul style="list-style-type: none"> • A flourishing economy and City Centre which meets the needs of our residents, businesses and visitors. • A vibrant evening economy. • A City which improves through regeneration and development. • A City where people feel safe and happy in their community. • A healthy City with opportunities available to all.
Tewkesbury Borough Council Housing and Homelessness Strategy 2012 - 2016	The Housing and Homelessness Strategy 2012-2016 takes into account the aims of the national strategy but also considers how Tewkesbury will need to work at a more local level to make a real difference to residents across Tewkesbury Borough.	The strategy has four main themes under which a number of priority actions have been identified, each with objectives to be achieved: <ol style="list-style-type: none"> 1. Housing supply and delivery of good quality affordable housing 2. Homelessness and Homelessness Prevention 3. Housing to meet the housing needs of specific groups 4. Neighbourhoods and housing standards
Cheltenham Borough Council Housing and Homelessness Strategy 2012 - 2017	The Housing and Homelessness Strategy 2012-2017 takes into account the aims of the national strategy but also considers how Cheltenham will need to work at a more local level to make a real difference to residents across Cheltenham Borough.	Vision: 'is for residents to be able to access and maintain suitable, affordable accommodation within communities that are safer, stronger and healthier. It sets out the following priorities: <ul style="list-style-type: none"> ▪ Priority 1: To increase the provision of Affordable Housing ▪ Priority 2: To make best use of existing housing stock ▪ Priority 3: To improve access into suitable, affordable accommodation and helping households to stay in their homes for longer ▪ Priority 4: To tackle the causes of homelessness ▪ Priority 5: To create stronger, safer and healthier communities

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
Our Future, Our Choice Cheltenham's Sustainable Community Strategy 2008 - 2011	The strategy aspires to identify community needs and aspirations and seeks to improve the quality of life for those that live and work in the area.	Four key aims: <ul style="list-style-type: none"> ■ To set out local communities needs and aspirations ■ To provide an assessment of the future challenges facing Cheltenham and what is collectively needed to be done to respond ■ To set out an aspirational long term vision for the achievement of sustainable development in Cheltenham; and ■ To focus and shape existing and future activity of public, private, voluntary and community organisations that operate locally so that they effectively meet community needs and longer term aspirations.
Gloucestershire Health and wellbeing Strategy 2012 – 2032 – Fit For The Future	The aspiration of this strategy is to continue to improve the quality of life for everyone in Gloucestershire within available resources. This is why the strategy spans 20 years, and it aims to be implemented through three-year action plans that are refreshed annually. This will enable measurement of progress in the short, medium and longer term.	Uses the life-course approach: <ul style="list-style-type: none"> ■ Starting well – with a focus on pregnancy and early years to give every child the best start in life ■ Developing Well – a focus on children and young people maximising their capabilities and control over their own lives ■ Living and Working Well – a focus on promoting healthy lifestyles; equitable access to ill-health preventative services; healthy and sustainable physical environments; building social networks and communities and access to good employment opportunities ■ Ageing Well – promoting independence, physical and mental health and wellbeing post-retirement. <p>Under each of the above headings it sets aspirations to achieve in the Gloucestershire area.</p>
YOUR HEALTH, YOUR CARE Our five year vision for Health and Social Care	Over the next five years Your Health, Your Care seeks to support the aspiration of the Health and Wellbeing strategy by putting in place the building blocks to ensure that we can continue to improve the quality of life for everyone in Gloucestershire.	The vision for Gloucestershire Health Community is to have: <ul style="list-style-type: none"> ■ Joined up care for the people of Gloucestershire ■ People empowered to take more control over their own care ■ Mainstream services that are accessible by all vulnerable people, wherever they may live ■ Enhanced outcomes for the population ■ Improved use of resources

Plan/Policy/Programme	Key Message	Targets/Indicators/Objectives
Gloucestershire Children and Young People's Partnership Plan 2015-2018	'To ensure our children and young people thrive and reach their full potential; providing appropriate support for those families who need it most'	Our vulnerable children, young people and families have an entitlement to Early Help; Targeted Interventions and for some, Intensive Intervention to: <ul style="list-style-type: none"> ■ Enjoy the best start in life ■ Maximize their capabilities and have control over their own lives ■ Be safe from injury, exploitation and harm ■ Work well together to provide right and timely effective intervention for vulnerable children and families as early as possible
Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) Submission 2014	The document outlines the future of development (both housing and employment) and associated infrastructure for Gloucester, Cheltenham and Tewkesbury and their surrounding areas up until 2031.	Includes specific strategic objective for promoting healthy communities
Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) Sustainability Appraisal incorporating Strategic Environmental Assessment (SA/SEA) 2014	The SA/SEA of the JCS has been ongoing since 2008 and is being undertaken alongside the preparation of the plan. This report sets out the SA/SEA of alternatives – reasons for consideration, assessment methods and findings, reasons for selection/rejection, reporting and consultation - throughout the period from 2008-2013. The JCS was assessed against a number of environmental objectives and following the assessment the contents of the JCS has been amended accordingly to reduce/ mitigate any significant impacts.	The SA Framework includes a number of Objectives which either directly or indirectly seek to reduce inequalities.

Appendix II of Appendix VIII: Equality and Diversity Impact Assessment (EqIA)

EqIA Key and Method Notes:

The assessment uses a simplified version of the SA/SEA appraisal key applied across the draft plan's policies, with the assessment informed by decision aiding questions:

- Will the policy have a negative effect on any of the protected characteristics?
- Will the policy have a negative effect on any of the protected characteristics?
- How can identified negative effect be minimised or removed?
- How can identified positive effect be improved or enhanced?
- Is monitoring of the issues required?

Assessment Key	
+	Positive Effect
-	Negative effect
○	Neutral Effect
?	Unknown or Uncertain Effect

Vision & Objectives (October 2016)

EqIA Protected Characteristics	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
Draft Cheltenham Borough Local Plan Vision (Themes A-C)	+	+	+	+	+	+	+	+	+
<p>Commentary</p> <ul style="list-style-type: none"> The vision should benefit all groups as it seeks to provide a place where a good quality of life is open to all; this will have positive effects on all groups improving their quality of life and meeting the needs of each group's distinctive and individual needs. 									

Draft Cheltenham Plan Objectives									
	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
EqIA Protected Characteristics	1	2	3	4	5	6	7	8	9
Plan Objectives									
Theme A	+	+	+	+	+	+	+	+	+
Theme B	+	+	+	+	+	+	+	+	+
Theme C	+	+	+	+	+	+	+	+	+
Commentary <ul style="list-style-type: none"> Generally, the Objectives will have a positive effect on all protected characteristics. In particular, 'Recognise the local distinctiveness of Cheltenham's various neighbourhoods', 'Understand what people need from the places where they live', 'Ensure provision of sufficient housing land', 'Ensure provision of sufficient employment land', 'Address the challenge of climate change', 'Manage and reduce the risk of flooding' and 'Ensure that new communities are integrated with neighbouring communities to promote cohesion and reduce social isolation' will have greater positive effects on all social groups by improving accessibility, providing buildings which will meet their needs and be of a good quality and also providing flexible and adaptable buildings and places that are resilient to climate change and flooding. None of the Objectives are biased towards one particular protected characteristic. 									

Policies for Draft LPP1 (October 2016)

Local Plan Policy topics	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
Economy & Employment (EM1 – EM5)	+	+	+	+	+	+	+	+	+
Commentary <ul style="list-style-type: none"> Overall these policies have benefits for all groups and protected characteristics as employment is known to have positive effects on health and well-being 									
Local Green Space (GE8)	+	+	+	+	+	+	+	+	+
Commentary <ul style="list-style-type: none"> Positive effects for all groups through provision of and access to healthy activities, and recreational space 									
Development Proposals (PR1 – PR2)	+	+	+	+	+	+	+	+	+
Commentary <ul style="list-style-type: none"> The housing policies should benefit all groups overall as they seek to increase the availability and quality of housing in the City. The provision of mixed-use development will benefit all groups through improved accessibility to local employment opportunities. 									

Updated for Draft Local Plan (November 2017)

Local Plan Policy topics									
EqlA Protected Characteristics	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
Economy & Employment EM1-6 (previously EM1 – EM5)	+	+	+	+	+	+	+	+	+
Overall these policies continue to have benefits for all groups and protected characteristics as employment is known to have positive effects on health and well-being									
Design Requirements D1-3	0	0	0	0	0	0	0	0	0
Green Belt GB1-2 Landscape L1	+	+	+	+	+	+	+	+	+
Design and landscape/visual amenity policies will have positive effects for all groups									
Historic Environment HE1-5	+	+	+	+	+	+	+	+	+
Protection and enhancement of the historic environment will have positive effects for all groups									
Residential Development H1-2 (previously PR1-2) Housing Mix & Standards HM1-5 Travellers GT1	+	+	+	+	+	+	+	+	+
Positive effects for all groups through provision of identified need for housing; major positive effects indicated for gypsies and travellers through provision of pitches in Policy GT1 to accommodate needs for this distinct ethnic group.									

Local Plan Policy topics EqIA Protected Characteristics	Age	Disability	Gender Reassignment	Marriage and Civil partnership	Pregnancy and Maternity	Race	Religion or belief	Sex	Sexual Orientation
	1	2	3	4	5	6	7	8	9
The Housing Mix/Standards Policy is particularly strong on addressing the needs of specific groups of people - students, the elderly, and those working in agriculture/forestry.									
Health & Environmental Quality SL1	+	+	+	+	+	+	+	+	+
Policy safeguards all groups									
Access to the Transport Network TN1-2	+	+	+	+	+	+	+	+	+
Policy applies to all groups									
Green Infrastructure GI1-3 (previously GE8)	+	+	+	+	+	+	+	+	+
Commentary									
<ul style="list-style-type: none"> ■ Positive effects for all groups through provision of, and access to, healthy activities, and recreational space 									
Social & Community Infrastructure CI1-4	+	+	+	+	+	+	+	+	+
Policy applies to all groups									

The Cheltenham Plan 2011-2031

**Report of consultation to accompany the pre-
submission version of the plan**

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Preface

This report sets out how Cheltenham Borough Council (CBC) undertook consultation between 2013 and 2017 to inform the Pre-Submission version of the Cheltenham Plan. The document summarises how we consulted, who was invited to make representations, the comments that were received and how we have responded to these in preparing the Pre-Submission Plan.

The consultations have been undertaken in accordance with the Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 22)

(1) (i)-(iii) which state that a Consultation Statement must be produced to show:

- Which bodies and persons CBC invited to make representations under Regulation 18
- How those bodies and persons were invited to make representations under Regulation 18
- A summary of the main issues raised by the representations made pursuant to Regulation 18, and
- How any representations made pursuant to Regulation 18 have been taken into account

CBC undertook three Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18) consultations, as detailed below:

- i. The first consultation was undertaken on the Cheltenham Plan Scoping Report during an 8-week period ending on the 2nd September 2013.
- ii. The second consultation was undertaken on the Cheltenham Plan (Part One) Issues & Options during a 6-week period in June / July 2015.
- iii. The third consultation was undertaken on the Cheltenham Plan (Part One) Preferred Options during an 8-week period in January / February 2017 and was a non-statutory stage of consultation.

Therefore, in total, we consulted for over 20 weeks and have given the community significant opportunity to provide input and comment on the emerging Cheltenham Plan. This significantly exceeds the 6-week statutory consultation period stipulated in the Regulations.

Over 600 people/organisations inputted into the three rounds of consultation providing in excess of 1100 comments. This paper sets out the detail of each consultation and our response to the comments received during each consultation. It also sets out what consultation was undertaken, when, with whom and how it has influenced the latest version of the plan (i.e. the Pre-Submission version).

It is envisaged that this Consultation Statement will assist the Inspector at Examination in determining whether the Borough's Local Plan complies with the requirements for public participation and government guidance.

The Council considers that the paper demonstrates the consultation was carried out in compliance with the statutory requirements as set out in the Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18). Also, that the report shows public involvement was carried out following the approach set out in the Council's Statement of Community Involvement (SCI).

Cheltenham Plan scoping consultation

Introduction

An eight week consultation ended on 2 September 2013. It looked to decide on the focus of the Cheltenham Plan. In total we received 52 responses from a range of interest groups, public and private sector bodies, and individuals.

Overview

The scoping questionnaire included a total of 14 questions, mainly examining the vision for Cheltenham, the objectives of the Cheltenham Plan and how to tailor them to be specific to avoid cross-over with the JCS.

Comments on the vision included support for the extant corporate vision alongside some criticism of the JCS vision. Some notable points were a need for infrastructure improvements to be included, as well as provision of sufficient housing, an enhanced tourism offer and re-use of previously developed land. A number of responses noted a tendency for existing visions to relate to “anytown” needs and called for more specificity for the town.

Respondents were asked to give their own vision for Cheltenham. Issues that featured frequently included better public transport provision (road & rail), a balance between a range of potentially conflicting concerns such as growth versus conservation of valued assets, encouragement of sustainability and protection of green assets, along with other infrastructure improvements such as affordable housing and crime prevention.

The idea of a themed vision was also tested and generally respondents were in support of it. Some were not while others had reservations over whether depth would be lost and if more nuanced issues would be overlooked.

The questionnaire gave respondents the opportunity to state one aspect of Cheltenham they liked most and one that needed to change. The positive comments generally focused around the quality of the built environment, especially trees and open spaces. Vibrant culture and the multitude of festivals that add to the town’s vitality were also cited. Negative issues tended to revolve around transport problems and the effect of increased pedestrianisation. Other problems included poor quality suburbs, unused brownfield sites and shabby buildings, a persistent threat to the green environment from new development/growth and poorly linked retail centres.

Objectives were taken from existing plans and presented to respondents to comment on their importance, using a scale of Very Important, Quite Important, No View and Not Very Important. Most objectives were deemed by most respondents to be either very important or quite important. Good design, conserving landscape and the green environment, re-using brownfield land, economic vitality and sustainable transport had the highest number of “very important” responses. Safeguarding existing employment land and provision for the elderly/disabled had the most “quite important” responses. The highest number of “not very important” responses applied to safeguarding existing employment land and preventing the coalescence of Cheltenham with other settlements – recreation/leisure and tourism also attracted a high instance of responses in this category.

When asked what other objectives could be included, a range of objectives were suggested, such as greater emphasis on cycle and walking provision, as well as improved local shopping provision.

In terms of making objectives more specific to Cheltenham, several comments highlighted building upon the essential character of Cheltenham, such as Regency architecture/layout, landscape setting and related matters. Calls were made for greater “local” responsiveness that recognises the individual character of the various urban and suburban components of the town and its peripheral villages. Some concern was expressed about not allowing these local distinctions to be compromised or homogenised by JCS growth proposals, fearing major growth could reduce Cheltenham’s distinctiveness.

Suggestions for topics that had been missed included regeneration of the High Street; cycle paths rather than marked lanes on roads; the sense of a transport strategy guiding the element of the plan; the link between the nature of the town and its economic success and quality of life; designing out crime; farming and agriculture; sufficient reference to sport and the racecourse; and meeting the needs of young people and the unemployed.

To develop the policy areas, respondents suggested a number of approaches. Ensuring better co-ordination with JCS partner authorities was common. Undertaking face-to-face research interviews to establish people’s concerns about living in and visiting Cheltenham was also recommended. Specific policies for Cheltenham Racecourse and gypsy and traveller accommodation were suggested to increase specificity of the plan to Cheltenham. Multiple suggestions were given for environmental issues, such as establishing a green network, reinstating Local Plan environmental objectives, strengthening the approach to development affecting landscape, AONB and biodiversity and including water improvement and pollution prevention policies.

Respondents were also asked to consider what factors would be key in making the plan deliverable, where finances was most commonly cited. Other factors included political and public support as well as a robust evidence base.

Finally, further comments were requested. Some of these focused on the importance of partnership working, particularly within the JCS. Others emphasised environmental concerns like making a theme around careful use of natural resources or maximising sustainable transport opportunities. Some considered the mechanics of the plan, such as how the JCS and Cheltenham Plan would dovetail or how the plan would facilitate and inform Neighbourhood Planning.

Cheltenham Plan (Part One): Issues and options consultation

Introduction

Cheltenham Borough Council published the 'Cheltenham Plan (part one) issues and options' document for a six week public consultation in summer 2015. This follows on from the Scoping (Regulation 18) 2013 consultation. The consultation opened at 12am on Monday 22 June and closed at 5pm on Monday 3 August 2015; businesses, residents and visitors to Cheltenham were invited to submit comments online.

A copy of these consultation documents, questionnaires, maps and supporting evidence were made available on the Council website. Hard copies were also made available at the deposit locations as required by the Statement of Community Involvement document. The consultation was based on a questionnaire which sought views on Cheltenham's economy and employment sites, local green spaces and potential future development sites.

An interactive online map showing local green space, existing employment sites, potential development site options and sites with existing planning permission for residential and/or employment development was made available at cheltenham.gov.uk/maps. Evidence supporting the emerging plan was also available for comment¹, this included the Cheltenham economic strategy paper, the local green space study, the AONB landscape sensitivity study and the integrated appraisal scoping paper.

1,266 people, businesses and organisations (statutory and non-statutory) were contacted via email using the INOVEM consultation system. A further 47 people, businesses and organisations were contacted by letter, these were mostly land owners². 556 people, businesses and organisations (statutory and non-statutory) completed questionnaires.

122 questionnaires were completed online the remaining 444 completed questionnaires were emailed to local.plan@cheltenham.gov.uk or were posted to Municipal Offices, Cheltenham. One of these questionnaires was a test carried out by officers.

Six weeks prior to the consultation starting the Council advertised the consultation to local stakeholders in line with Gloucestershire compact agreement as set out in the council's Statement of Community Involvement³. A press statement was published on the council's website a week before the consultation. The Gloucester Echo published an article advertising the consultation on their website on 21st June 2015⁴.

The council held a number of consultation events across Cheltenham during the six week period, these were:

Date	Event	Times
18/05/2015	Hesters Way Partnership	18:30
26/05/2015	Neighbourhood Co-ordination Group chairs	17:30

¹ http://www.cheltenham.gov.uk/info/1004/planning_policy/378/local_development_framework-evidence_base

² Including all those identified by the land registry as owners of land being considered at this stage for local green space designation

³ SCI paragraphs 8.1 and 8.2

⁴ <http://www.gloucestershireecho.co.uk/views-future-Cheltenham-borough-council-consults/story-26738441-detail/story.html>

10/06/2015	Pittville Partnership	19:00
04/07/2015	Mid-summer Fiesta, Montpellier Gardens	12:00 to 21:00
13/07/2015	Charlton Kings Parish Council Planning committee	19:30
18/07/2015	Regents Arcade	10:00 to 16:00
23/07/2015	St Pauls Road area association	18:30

Overview

The questionnaire included 43 questions that focused on four key areas: the plan's vision and objectives, the Cheltenham economy and existing employment sites, local green spaces and future development sites.

A significant proportion of comments focussed on local green spaces and in particular the need to protect the Leckhampton fields and fields surround Swindon Village from development. Many sought to use this consultation as another opportunity to register their opposition to the Joint Core Strategy which seeks to allocate these two areas for residential and mixed use development.

During the 6 week consultation Tewkesbury Borough received a petition regarding land at White Cross Green (also known as *Land to the west of farm lane, Shurdington*) in Tewkesbury Borough, which is adjacent to Leckhampton. The petition (postcard) requested Tewkesbury Borough Council (TBC) to designate the land as local green space and reject proposals for residential development; TBC received 380 postcards. Tewkesbury Borough Council resolved to grant planning permission for residential development on land at White Cross Green in September 2015. The petition did not reference the issues and options consultation and was not in responses to a request in the consultation, but it is seen as an important local issue that occurred at the same time by many participants and it is relevant to the ongoing local green space application at Leckhampton.

Several respondents felt that parts one and two of the plan should be joined and many expressed concerns that development sites should not be selected ahead of assessments on green space and recreation needs. Similarly some respondents felt there was too much emphasis on development and not enough on conserving and sustaining the quality of the town and environment (including urban green spaces).

Some responses raised concerns about the robustness of the AONB landscape report, including a report from the 'Save our AONB' group. These comments and others have been passed to Ryder Landscape for their consideration.

The quality of Cheltenham's built environment, including parks, trees and open spaces as well as the town's broader landscape setting was often cited and highly prized by respondents. This message was also identified at the previous scoping stage.

Vision & Objectives

Over two-thirds of respondents, that answered the question, agreed with the draft vision and objectives, although 22 respondents did not agree. Some felt the terminology / phraseology meant the vision objectives were unclear, too generic and did not reflect Cheltenham. It was argued that the council should ensure the vision and objectives act as a guide in the policy making exercise as was well providing prompts to the interpretation of objectives.

A further refinement of the objectives was suggested especially where objectives are mutually exclusive (protecting green fields and landscapes vs growth). It is argued by some that this would

help to avoid a stalemate in any future planning balance exercise. A number of respondents raised issues relating to the AONB and highlighted the need to protect it from development as an objective.

It was suggested that the Plan should bear a much stronger link to the principles, aims and objectives as set out in the Joint Core Strategy (JCS). Particularly, with reference to ensuring provision of sufficient housing land that meet the needs of the current and future population of the Borough. Some respondents felt the inclusion of measurable targets as part of the objectives would provide the Cheltenham Plan with a clearer and stronger strategic focus, upon which the success of the Plan can be understood and monitored.

Cheltenham Economy

This chapter was split into three policy approaches and each approach identified a number of policy options, these are:

- A. Safeguarding existing and future employment land (*22 in favour, 11 against; option 3 most preferred*);
 - OPTION 1: Continue with general protection of office, industrial and storage space (B uses only) as established by adopted local plan policy EM2;
 - OPTION 2: Amend the general policy of B uses only (as established by adopted Local Plan policy EM2) to allow other forms of economic development;
 - **OPTION 3: Protect the best and evaluate the rest;**
 - Other option;
- B. Promoting one type of industry over another (*13 in favour, 4 against; option 4 most preferred*);
 - **OPTION 4: Introduce selective management of Cheltenham's economy;**
 - OPTION 5: No policy intervention;
 - Other option;
- C. Promoting a Cyber Security cluster (*12 in favour, 3 against; option 6 most preferred*);
 - **OPTION 6: Introduce a cyber-security cluster;**
 - OPTION 7: Do not promote cluster development; and
 - Other Option.

Although there were over 550 questionnaires submitted during the six week consultation most did not answer every question available on the questionnaire. Options presented in the economic chapter were selected 47 times; this was further supported by 238 free textbox comments.

Several respondents focused on NPPF paragraph 22 which states councils should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.

Significant numbers opted for option three; in essence it offers the greatest flexibility and creative approach to safeguarding employment land. Protecting employment sites suitable for growing high GVA employment was a key theme to emerge. Others recommended allowing more flexible employment use on sites where there is persistent vacancies, reasoning this would ensure the council has policies flexible enough to adapt to future trends and technology advances.

In broad terms respondents recognised land availability is constrained and suggested industries that can provide added benefit to Cheltenham's economy and the town should be promoted over others. Conversely several respondents felt this was not the role of town planners and the council to micromanage the local economy, it should be market led with flexible planning policies to support the local economy. Only in exceptional cases should the Council intervene.

Respondents identified the crucial role GCHQ plays in Cheltenham future economy. A cyber security (high technology) cluster was very well supported. Many supported the actions to grow the cyber security industry in Cheltenham however a few cautioned this should not be at the expense of other industries. Some believed other industries should be the focus of a cluster policy, examples include high tech industries, defence, IT, education, manufacturing, cultural industries and promoting corporate HQs.

Some raised the importance to protect small light industrial units from changing use to housing. It was argued these units support small scale/family run businesses, which find it difficult to relocate to big and expensive industrial parks. Several respondents also felt the council should make the planning process easier, especially for small changes on industrial estates and where the neighbours are unlikely to object.

Several references were made about the Cheltenham economic strategy study. Several felt there were issues missing from the study, tourism was cited several times. It should be noted the Council is currently preparing a tourism strategy that will complement the economic strategy study. Comments specifically relating the economic strategy study will be sent to and be considered by Athey Consultants.

Local Green Space

This chapter identified three policy options, these are:

- OPTION 8: Allocate all designated 'Public Green Spaces' as 'Local Green Spaces';
- **OPTION 9: Maintain existing local 'Public Green Spaces' and only allocate 'Local Green Spaces' that meet the framework's criteria;**
- OPTION 10: Maintain existing approach of designating 'Public Green Spaces';
- Other option;

Option nine was the clear favourite with 292 out of a total of 322 responses in favour. Several organisations did not give a view on their preference but did request all existing sites be considered collectively rather than as a series of individual sites and to consider integrating green spaces with strategic green infrastructure opportunities.

The majority of respondents commented on local green spaces issues, with approximately 1,700 uses of the term across all submitted questionnaires. The Leckhampton Fields sites (CP106, CP107 & CP108) accounted for 43% of all LGS comments. Redthorn Way, Swindon Village, and the A40 corridor were all referenced over 100 times. The vast majority (99%) of comments relating to the 29 LGS sites (as identified in the consultation document) were in support; although levels of support for individual sites varied considerably. Those not in favour of a LGS designation only registered opposition to Leckhampton Fields, and Swindon Village.

Several new LGS sites were promoted, these include:

- Ashley Close adjacent to number 16;
- Honeybourne Line;
- Caernarvon Park, Up Hatherley
- Open space between Cirencester Road and Newcourt Road, adjacent to the car wash site;
- Holy Apostles Primary School Fields;
- Glenfall Way School site;
- Reeves Field (A toolkit was submitted in support of this site).

General suggestions were also made and included all school playing fields, the countryside immediately adjacent to the town which is heavily used by the public for informal recreation, orchards and ancient woodlands. The Honeybourne line was suggested by a number of respondents although some respondents felt that a local green space designation might constrain potential sustainable transport projects in the future.

Several land owners expressed concerns about potential local green space designations on their land. Several stated that Local Green Space should not be used to undermine aims of identifying sufficient land at suitable locations to meet identified development needs. At least one respondent felt the plan should make clear the local green space study simply reported on feedback from interest groups on their desire for Local Green Space designation. It did not provide analysis or critique of suggestions and made no recommendations.

The Big Local project in St Peter's and the Moors response identified the need to consider the importance of maintaining and improving the area's local green space. Some of the spaces Big Local, the West End Partnership and local residents have cumulatively identified within the area that require consideration are:

1. Elmfield Park
2. The Old BMX track (the Moors)
3. The Hardwicke Green (University Of Gloucestershire)
4. The Folly (University Of Gloucestershire)
5. The Old Peace Garden (Tewkesbury Rd)

Development Sites

103 potential site allocations were presented in the consultation document and approximately 350 references were made to these sites.

Whilst JCS urban extensions sites did not feature in this consultation many respondents objected to these allocations. Of the sites that did feature in the consultation Glenfall Way (CP029) was the most discussed development site. The agent promoting the land for development requests the site be allocated for residential development. All other comments disagree and they do not consider the site suitable for residential development. Save our AONB action group identified a number of issues with the AONB landscape sensitivity study and submitted a report explaining their concerns. These comments will be sent to and be considered by Ryder Landscape.

Most were not in favour of development at Priors Farm and stressed the need to protect the land for the health and wellbeing of local residents; conversely some respondents recognised greenfield sites adjoining the principal urban area may be required to meet the challenging housing requirement, although this should only occur once all brownfield sites have been developed.

Most supported housing and mixed development on North Place and Portland Street. Historic England stresses the need to ensure development integrates with the townscape and complements rather than competes for attention with Regency Cheltenham.

The vast majority of comments made in relation to green belt sites were not supportive of development and expressed the need to maintain the existing Green Belt boundaries. Land at and adjacent to the Reddings and land at West Cheltenham (JCS safeguarded land) were highly cited.

A good proportion of agents submitted detailed comments and evidence in support of their sites. Planning agents focused on the need to boost the supply of housing in line with the NPPF and many

also referenced the JCS examination and challenged Cheltenham's housing numbers (objectively assessed housing need).

The County Highways department submitted a succinct comment for each site that focussed exclusively on highway access. The Environment Agency, Historic England and Natural England (statutory consultees) also provided detailed guidance and advice on a number of sites.

Several new sites and development locations were promoted and suggested during the consultation, these include:

- The East Gloucestershire Club, Old Bath Road;
- Former Premiere Products site on Bouncers Lane, Oakley
- Land adjacent to Longfield, Charlton Kings;
- Land to rear of 291-297 Cirencester Road, Charlton Kings;
- Land Adjacent to Timbercombe Farm, Little Herberts Road, Charlton Kings; and
- John Dower House, 24 Crescent Place, Cheltenham, Gloucestershire, GL50 3RA and South Court.

General suggestions were also made and included the need to integrate housing into town centre developments, focus on brownfield sites that are unoccupied or derelict. Several respondents identified sites around the racecourse as potentially suitable locations for Gypsy, traveller and showpeople communities. Conversely there was opposition to sites being made available in the AONB.

New sites will be included in the next update of the SALA where the panel will examine the availability, suitability and achievability of development over the plan period (to 2031).

Integrated Appraisal

A small number of respondents noted and accepted the integrated appraisal scope and reserved detailed comments to the next stage. One respondent stressed the need to follow good practice and develop SA objectives from the objectives of the plan, albeit recognising the process is iterative. The same respondent also highlighted the need to assess policies on different population groups to ensure that discrimination does not take place. These comments will be sent to and be considered by Enfusion.

Cheltenham Plan (Part One): Preferred Options consultation

Introduction

Cheltenham Borough Council published the 'Cheltenham Plan (Part One) Preferred Options' document for a six week public consultation in spring 2017. This follows on from the 'Issues and Options' consultation in 2015. The consultation opened on Monday 6th February and closed at 5pm on Monday 20th March 2017; businesses, residents and visitors to Cheltenham were invited to submit comments online or in writing.

Several documents, including questionnaires and proposal maps, were distributed to deposit locations across the borough shown on the map below. These documents are also available online (<http://consult.cheltenham.gov.uk/consult.ti/cododdo/consultationHome>). The questionnaire was based on the economy, local green spaces, and development sites, taking into account responses to the previous 'Issues and Options' consultation. Respondents had the opportunity to answer 15 questions and leave additional comments if desired.

All of the proposals from the Preferred Options consultation were presented on an online, interactive map. The wider evidence base which supports the emerging Cheltenham Plan, such as the AONB landscape sensitivity report, was also available to comment upon.

The Preferred Options were available online for comment, using the INOVEM consultation system. Prior to the consultation, 2829 people, organisations, and groups (statutory and non-statutory) were contacted either by email or letter, and invited to take part in the consultation. There were 668 consultees who responded to the questionnaire.

Six weeks prior to the consultation starting the Council advertised the consultation to local stakeholders in line with Gloucestershire compact agreement as set out in the council's Statement of Community Involvement.

The council also held five public consultation events across the borough. In total around 200 people attended these events. The times and locations are listed below.

Date	Event	Times
16 th February 2016	Leckhampton Village Hall	15.00 to 19.00
20 th February 2016	Oakley Community Resource Centre	15.00 to 19.00
7 th March 2016	Prestbury Library	15.00 to 19.00
11 th March 2016	Regents Arcade	10.00 to 15.00
14 th March 2016	Hester's Way Community Resource Centre	15.00 to 19.00

Overview

The questionnaire consisted of 15 questions which focussed on preferred policies for the economy, green space, and future development sites. The preferred options were generally met with approval, with over 70% of respondents agreeing with the Vision Themes and Objectives, economic strategy, and employment proposals. Policies protecting the Honeybourne Line and Local Green Spaces (LGS) were well received, whereas proposals for future housing development sites were less popular. See appendix 1 for summary of responses to all questions.

192 postcards were received by respondents supporting the protection of LGS at Leckhampton. The postcard, produced by Leckhampton Green Land Action Group (LEGLAG), asked respondents whether they agreed with the parish council's proposed LGS boundaries.

Several respondents expressed concerns over proposed housing developments, particularly Reeve's Field and Prior's Farm. The JCS strategic allocations in the West and North West of Cheltenham were also commented upon despite the principle of development of these sites being an issue outside the remit of the Cheltenham Plan.

Some respondents felt that parts one and two of the plan should be joined. Part one of the Cheltenham Plan, containing site allocations and an economic strategy, was planned to go through to examination first. The second part would then be prepared and would contain all other policies and fully replace the current Local Plan. Delays to the JCS process has meant that the Cheltenham Plan timetable has been changed since the Preferred Options consultation documents were drafted. We now intend to bring the Cheltenham Plan to be adopted as one cohesive document. So the next consultation will include versions of the policies in the Preferred Options but it will also contain other policies for built environment, environmental protection, amenity space etc.

Vision & Objectives (Question 1)

The Vision Themes and Objectives received approval from 76% of respondents. Several consultees who responded 'no' when asked whether they agreed with the Vision and Objectives, went on to state in the comments that they actually generally agreed with most of the proposals. Some consultees took issue with Section 2.3 Vision Theme C, stating that the Cotswold Area of Outstanding Natural Beauty (AONB) should be referenced explicitly in this section.

The Economy (Questions 2, 3, 4, 5, 6 & 7)

The questionnaire posed several questions on the economy, including whether the public agreed with the proposed Preferred Strategy for the economy. Consultees were also asked to respond to specific economic proposals, regarding designation of employment land, and promoting economic growth.

91% of respondents supported the overall Preferred Strategy for the economy, with requests to ensure that more high-value jobs are created, and that the growth of the employment sector does not negatively affect traffic and parking in the town centre.

Policy EM1, which proposes to safeguard key existing employment land, was very popular with respondents (92%), and several of those who left additional comments cited the need to retain employment land in key areas of the town. Critics of the proposal stated that not enough sites were designated, or that applications on existing employment sites should be judged on their individual merits.

The proposal to safeguard non-designated existing employment land (EM2) was just as popular, receiving approval from 91% of respondents. The comments presented similar themes to the EM1 response, but with consultees highlighting the request to provide housing where employment uses have failed or are underused.

The proposed EM3 policy designates new sites as employment allocations, whilst still popular amongst respondents (75%), several comments raised concern over Grovefield Way. Consultees state that no further incursions into the Green Belt should occur, and that no retail uses are required at this site. The decision to remove this site from the Green Belt is part of the JCS and not the Cheltenham Plan.

Policy EM4, designed to promote a cyber-security sector in Cheltenham, received strong support (93%). Several respondents believe that having a cyber park would give Cheltenham an advantage in attracting high-value jobs in a unique industry.

The protection of the Honeybourne line also proved to be a popular proposal, with 93% of consultees supporting it. However, many comments from both supporters and detractors request for the cycle route to be extended, both into the town centre and in north and south directions. One consultee, Sustrans, proposed an extension to the cycle route northwards to the racecourse.

Local Green Space (Question 8)

The consultation put two options forward for Local Green Space (LGS), GE8A and GE8B. Of the two LGS policies, GE8A was clearly preferred over GE8B, with 88% of respondents supporting this option. GE8A consists of designating the following sites as LGS:

- Land at Hesters Way Community Centre
- Land at Lynworth Green
- Land at Albemarle Orchard
- Land at Colesbourne Road and Redgrove Park
- Land at Victoria Cricket Ground
- Land at Fairview Green
- Land at Newcourt Green
- Land at Henley Road and Triscombe Way
- Land at Chargrove Open Space
- Land at Redthorne Way
- Land at Caernarvon Park
- Land at Pilgrove
- Land at Swindon Village
- Land at Leckhampton (indicative area only)

The sites included in GE8A were considered to be demonstrably very special to the local community and suitable for Local Green Space designation. Six of the sites included in GE8A currently benefit from planning protection as Public Green Space. These sites would not usually gain any additional planning protections from LGS designation so an alternative option (GE8B) was included which omitted those six sites

Certain sites received specific interest from respondents. A parish council proposal for LGS at Leckhampton received significant support, with 192 LEGLAG postcards being submitted. An application for LGS along the A40 received comments, with respondents asking for the plan to recognise the area as a valuable green space. Reeve's Field, a site belonging to Cheltenham College received suggestions to be allocated as LGS. New suggestions were also made for designations of LGS, which included land off Oakhurst Rise and a verge on Harrington Drive.

Development Proposals (Question 9 & 10)

Policies PR1 and PR2 propose allocating sites for residential use or mixed use. Many comments on these policies are from developers promoting specific sites.

Housing allocations proposals were not as popular as other policies in the consultation, with many respondents disagreeing with specific sites.

The Reeve's Field site, which was proposed for housing, received objections based on the current use of the site as a sports field. Several respondents felt that the allocation contradicted paragraph 74 of the NPPF, which states that land used for sports or recreational purposes should only be built on in special circumstances. Other issues raised include: the location of the site in a conservation area, the potential loss of a green space, the availability of the site for development, key views of the escarpment from the field, and traffic problems which might arise from further housing development.

Objections to Prior's Farm, a potential mixed use development allocation, also mention the loss of playing fields. Consultees are keen for any development at this site to retain or improve the leisure facilities used by the community.

Despite not being allocated in the plan, many respondents referred to a greenfield site adjoining Oakhurst Rise. Objections were raised to a potential development consisting of 100 houses. Several responses outline the importance of the site as a green space, and the potential loss of wildlife, should the area be developed. Consultees also suggested flood risk and loss of school usage as grounds for objection.

The Preferred Options document included a combined housing and Local Green Space (LGS) allocation at Leckhampton. As aforementioned, the Parish Council's proposal for green space was very popular. However, the majority of respondents for both the LGS proposals and the housing proposals in Leckhampton objected to the idea of too much housing in the area. Issues raised include: loss of valuable green space, increase in traffic exacerbating congestion issues, strain on local public services, and site location in proximity to the AONB.

A number of agents submitted detailed comments and evidence in support of their sites. Planning agents focused on the need to boost the supply of housing in line with the NPPF and many also referenced the JCS examination and challenged Cheltenham's housing numbers (objectively assessed housing need).

Amendments to the Principal Urban Area (Question 11)

The Preferred Options consultation proposed several amendments to the Principal Urban Area (PUA) in order to better represent the urban boundary of Cheltenham. The proposal was positively received, with 62% of respondents agreeing with the amendments. The objections to the amendments largely focussed on a site called 'The Hayloft' in The Reddings. This site had been included within the urban extent of Cheltenham as there has been a building on the site for over 100 years. Despite this, many respondents claimed that the development had taken place without permission, and that by including this site within the PUA the council was validating the development. Some respondents also believed that the PUA extension in this area represented a release of neighbouring green belt land.

Several planning agents, consultants, and developers requested further extensions to the PUA, particularly where their own sites were involved.

Article 4 Directions (Questions 12, 13 & 14)

An Article 4 direction is made by the local planning authority. It restricts the scope of permitted development rights either in relation to a particular area or site, or a particular type of development anywhere in the authority's area. Where an Article 4 direction is in effect, a planning application may be required for development that would otherwise have been permitted development.

The consultation posed three questions to respondents regarding Article 4 directions. Consultees were asked whether HMO restrictions were required, whether development should be restricted in conservation areas, and whether employment uses being lost to residential should be restricted. A house in multiple occupation (HMO) can be defined in simple terms as a shared residential property where a certain number of occupants are not related to each other and they share basic amenities such as kitchen areas and bathroom facilities. The responses marginally supported introducing Article 4 directions to both restrict HMOs (58%) and protect conservation areas from householder development (65%). A slight majority did not want to restrict the loss of office space to residential uses (53%).

From the comments, some respondents think that the St. Paul's area should have an HMO restriction. Several responses state that there are too many HMOs occupied by students in this area, and more housing should be available for families. The town centre is also mentioned, as the number of HMOs in this area is considered damaging to the infrastructure and character of Cheltenham. Work is ongoing to assess the amount, density and impact of HMOs in the St Pauls and All Saints areas of the town. This will provide information on whether an Article 4 can be justified.

The most popular request for an Article 4 was to restrict harmful householder development in conservation areas. Many respondents felt that permitted development rights are harming areas of special character. Whilst the central conservation area was mentioned several times, most responses requested an Article 4 in all of the conservation areas of Cheltenham. A project to update Conservation Area Management Plans is progressing alongside the Cheltenham Plan. As part of this evidence will be gathered to make a case for Article 4 directions.

The majority of respondents did not think that an Article 4 was required to restrict the loss of employment land to residential use. However, most of the respondents who left comments requested that the town centre in particular should not have residential development, in order to protect Cheltenham's economy.

Evidence Base (Question 15)

The final question of the Preferred Options consultation provided consultees with the opportunity to comment on the supporting documents and reports which make up the evidence base for the Cheltenham Plan. Whilst many respondents used this as an opportunity to either comment on the plan as a whole or refer to topics from previous questions, some responses referred to supporting evidence documents, or recommended their inclusion.

The conservation area appraisals were frequently mentioned, with some responses praising the approach, and certain groups requesting to be part of the process. Historic England stated that they wanted to see stronger policies on heritage and conservation, rather than relying on the JCS. Some consultees also suggested moving the conservation area boundary in Prestbury, to include additional fields in the area.

The most frequently mentioned report in the evidence base was the AONB landscape sensitivity report by Ryder Landscape Consultants which received some criticism.

Some statutory consultees requested that the evidence base be expanded, and referred to specific studies which could be included, such as a Strategic Flood Risk Assessment (SFRA), or recommended that certain reports be improved. For example, Sport England suggested that the Green Space Strategy should omit playing fields and sports pitches, as a separate Playing Pitch Strategy and Built Facilities Strategy were in production.

Cheltenham Plan pre-submission (Regulation 18) consultation

Consultation on the pre-submission Cheltenham Plan is scheduled to take place in January and February 2018. Members of the public and stakeholders will be given a period of 8 weeks in which to make comment.

Comments will be invited from all contacts on the Planning Department's database and copies of the Plan will be made available electronically via the Council's website and in paper format at the Council's deposit locations.

Efforts will be made to ensure the public, local businesses, statutory consultees and other stakeholders are aware of the consultation through media releases, engagement with parish and neighbourhood groups, and via Council networks to alert groups to help cascade information. A small number of public consultation events will occur, likely to centre on busy times, which could include displays at the Regent Arcade and Municipal Offices and other locations as used during previous consultation exercises.

Following consultation, the Cheltenham Plan will be formally submitted to the Secretary of State (as the submission plan) along with all representations received as a result of the pre-submission consultation exercise.

APPENDIX 1**Local Plan consultation**

Consultation (including internal consultation within the Authority) has been undertaken on the Cheltenham Plan at each of the various stages of preparation and, where appropriate, the comments received have helped shape the plan and its contents. The following illustrates the primary mechanisms and events that have contributed most:

- Planning and Liaison Member Working Group (PLMWG) – a cross party group with a remit to consider and advise on the emerging Cheltenham Plan and provide guidance and feedback to Planning Committee, Cabinet and Council as appropriate. Through regular meetings, the Working Group has had a number of opportunities to comment and shape working drafts of the document. Meetings have also been held with other elected members (not part of PLMWG) and each of the political groups that requested an individual update.
- Internal officer working group - comprising officers from across the Council with a remit to consider, advise and inform the emerging Cheltenham Plan, requesting information from and providing feedback to individual teams as appropriate. This group has had the opportunity to feed into the draft scope, visioning and objectives consultation and has been kept informed on subsequent progress with the plan.
- Liaison with the Strategy and Engagement team to ensure that the Cheltenham Plan aligns with the Corporate Strategy and that consultation responses are elicited as widely as possible across the Borough.
- The Cheltenham Taskforce – regular updates and discussions have taken place between the Taskforce and officers leading the preparation of the Cheltenham Plan.
- Cheltenham’s parishes and communities have been kept up to date on latest developments with the Plan through updates to the regular ‘C5’ and meetings of the Neighbourhood and Community Group Chairs.
- Feedback from the Cheltenham Plan Scoping consultation (July –September 2013).
- Feedback from the Issues and Options Consultation (June – August 2016).
- Feedback from the Preferred Options Consultation (January - February 2017). Approximately 600 comments have been uploaded to the Council website and are summarised by way of a Consultation Report which is also available to view on the website.

APPENDIX 2**Consultee database**

The following groups and organisations have been contacted as part of the Cheltenham Plan consultation exercises undertaken since July 2013:

i. Specific consultation bodies

The Town and Country Planning (Local Planning) (England) Regulations 2012 define specific consultation bodies as:

- the Environment Agency
- the Historic Buildings and Monuments Commission for England (known as English Heritage)
- Natural England
- Network Rail Infrastructure Limited (company number 2904587)
- the Highways Agency
- a relevant authority any part of whose area is in or adjoins the local planning authority's area
- any person -
 - to whom the electronic communications code applies by virtue of a direction given under section 106(3)(a) of the Communications Act 2003, and
 - who owns or controls electronic communications apparatus situated in any part of the local planning authority's area
- if it exercises functions in any part of the local planning authority's area -
 - a Primary Care Trust established under section 18 of the National Health Service Act 2006(9) or continued in existence by virtue of that section
 - a person to whom a licence has been granted under section 6(1)(b) or (c) of the Electricity Act 1989
 - a person to whom a licence has been granted under section 7(2) of the Gas Act 1986
 - a sewerage undertaker
 - a water undertaker
- The Homes and Communities Agency

For Cheltenham Borough this includes the following:

- Badgeworth Parish Council
- Bishops Cleeve Parish Council
- Boddington Parish Council
- Bredon Parish Council
- Brockworth Parish Council
- Charlton Kings Parish Council
- Coberley Parish Council
- Cotswold District Council
- Dowdeswell Parish Council
- Relevant electricity and gas companies
- English Heritage
- The Environment Agency

- Forest of Dean District Council
- Gloucestershire Clinical Commissioning Group (replaces Primary Care Trust)
- Gloucestershire Constabulary
- Gloucestershire County Council
- Highways Agency
- The Historic Buildings and Monuments Commission for England
- Homes and Communities Agency
- Innsworth Parish Council
- Leckhampton with Warden Hill Parish Council
- Longford Parish Council
- Natural England
- Network Rail
- Prestbury Parish Council
- Severn Trent Water
- Sevenhampton Parish Council
- Shurdington Parish Council
- Southam Parish Council
- Staverton Parish Council
- Stoke Orchard Parish Council
- Stroud District Council
- Swindon Parish Council
- Relevant telecommunications companies
- Tewkesbury Borough Council
- Uckington Parish Council
- Up Hatherley Parish Council
- Whittington Parish Council
- Wiltshire County Council

ii. **General consultation bodies**

The Regulations define general consultation bodies as:

- voluntary bodies some or all of whose activities benefit any part of the local planning authority's area
- bodies which represent the interests of different racial, ethnic or national groups in the local planning authority's area
- bodies which represent the interests of different religious groups in the local planning authority's area
- bodies which represent the interests of disabled persons in the local planning authority's area
- bodies which represent the interests of persons carrying on business in the local planning authority's area

Cheltenham Borough Council's planning service holds a database of general consultation bodies and others that have registered an interest in planning policy consultations. These include:

- Local and national interest groups including community, activity and faith-based groups
- Residents that have asked to be included in planning policy consultations

- Businesses that have asked to be included in planning policy consultations
- Businesses with a significant presence in the local area
- Government agencies
- Land owners
- Property developers
- Property agents and planning consultancies

In addition to the above, there are many other residents, business owners and stakeholders who have asked to be notified of Cheltenham Plan consultations and their details added to the consultation database. Currently, the database includes contacts for over 2800 individuals and organisations.

APPENDIX 3

Comments on Issues and Options

Topic / Issue	Council response
Vision & Objectives	
Two thirds of respondents agreed with the draft vision and objectives	Noted and welcomed
Some respondents felt the terminology was too generic and did not reflect Cheltenham	Where possible, the Council has made the objectives more locally specific to take account of local distinctiveness
Further refinement of the objectives was suggested along with the introduction of a specific objective protecting the AONB	The objectives were refined wherever possible in order to give a clearer framework for policy development. A specific objective on protecting the AONB has been resisted as this is a requirement of the NPPF and is reflected in the policy content of the JCS and the Cheltenham Plan
It was suggested the objectives should bear a stronger link to the aims and objectives set out in the Joint Core Strategy and might include measurable targets to help measure the degree of success	There is now greater parity between the aims and objectives of the JCS and those of the Cheltenham Plan with the plans providing a coherent and complimentary policy framework. Targets to measure the success of policy will be included in the Cheltenham Plan's monitoring framework
Cheltenham Economy	
Option 3 was the preferred choice for the majority of respondents	'Protecting the best and evaluating the rest' (Option 3) was taken forward as the favoured approach for determining the Plan's employment strategy
Several respondents quoted NPPF (Para 22) which states that councils should avoid the long-term protection of employment sites where there is no reasonable prospect of a site being used for that purpose	The Council has prepared the Cheltenham Plan to be in accord with the NPPF and has been mindful of Para 22 in formulating the employment strategy including those sites that will be protected and by what means
Several respondents felt it was not the role of the council to micromanage the local economy; it should be market led with flexible planning policies to support the local economy	The Council has prepared the Cheltenham Plan to be a facilitator of economic development in the Borough having regard to a range of other strategies and initiatives including those of the Cheltenham Taskforce, the Gfirst Local Enterprise Partnership, and the JCS.
Many respondents identified the crucial role GCHQ plays in Cheltenham's economy and the concept of a cyber-security / high technology cluster was well supported	The Council has developed a policy that favours development proposals for businesses which support cyber security activities as part of a coordinated approach to economic development and land management over the plan period.
Some respondents argued the importance of preventing small light-industrial units from	The Council is mindful of the fact that there have been historic changes of use away from

changing use to housing	employment uses, principally to housing. The policy framework of the emerging plan adopts a dual-pronged approach to help prevent this trend from continuing in future.
Local Green Space	
Option 9 was the preferred choice for the majority of respondents	Maintaining existing 'Public Green Space' and only allocating 'Local Green Space' that meets the framework's criteria (Option 9) was taken forward as the favoured approach for addressing Local Green Space
The vast majority of comments relating to the LGS sites advanced in the plan were in support although levels of support varied considerably from site to site. Several new sites were also suggested	Noted. Newly suggested sites have been incorporated into the plan where they meet the criteria for the designation of LGS
Several land owners were concerned that Local Green Space should not be used to undermine the aims of identifying sufficient land at suitable locations to meet identified development needs	The Council acknowledges that Public Green Space and Local Green Space are extremely important to the local community and the number of LGS designations included in the emerging plan reflects this stance. The designation of LGS has not compromised the ability of the plan to make sufficient allocations for residential, employment and mixed-use development as all identified needs are being met either in the JCS or the Cheltenham Plan itself
Development Sites	
Whilst JCS urban extensions sites did not feature in this consultation, many respondents used this as an opportunity to object to these allocations	Inappropriate comments have been discarded as necessary
Some respondents recognised greenfield sites adjoining the Principal Urban Area (PUA) may be required to meet the challenging housing requirement, although this should only occur once all brownfield sites have been developed	The plan has attempts to strike a balance between brownfield allocations and greenfield allocations adjoining the PUA. However, it should be noted that most greenfield allocations are either embodied within or result from the strategy of the JCS.
There was a high level of objection to the suggested allocation of the site at Glenfall Way	The site was not taken forward in the Plan
Most respondents were not in favour of development at Priors Farm and stressed the need to protect the land for the benefit of the local community	This site was taken forward to the next stage as a low density, mixed-use development option which required careful master-planning to reconcile several competing demands
Most respondents supported housing and mixed-use development on North Place and Portland Street subject to integration with the townscape in this part of Cheltenham	Noted. This site was taken forward to the next stage of plan preparation having regard to community feedback and the fact that the site benefited from extant planning consent
Several new sites and development locations were promoted and suggested during the consultation	New sites were examined according to the availability, suitability and achievability of development over the plan period. Where

	appropriate, they were advanced to the next stage of plan preparation (e.g. the former Premiere Products site at Bouncers Lane)
More general suggestions referred to the need to integrate housing into town centre developments and focus on brownfield sites that are unoccupied or derelict	The comments are noted and have formed one of the guiding principles in the preparation of the plan with allocations being made in accord with those priorities wherever possible

APPENDIX 4

Comments on Preferred Options

Topic / Issue	Council response
Vision & Objectives	
The vision and objectives were largely supported at this stage although some consultees continued to request that the AONB be referenced specifically in this section.	A specific objective on protecting the AONB has been resisted as this is a requirement of the NPPF and is reflected in the policy content of the JCS and the Cheltenham Plan.
The Economy	
91% of respondents supported the overall Preferred Strategy for the economy.	Noted and welcomed.
Policy EM1, which proposes to safeguard key existing employment land, was very popular with respondents, achieving a 92% approval rating.	Noted and welcomed.
Some critics of the policy stated that not enough key sites were designated, whilst others stated that applications on existing employment sites should be judged on their individual merits rather than on a blanket designation.	The methodology for identifying key sites focusses on particular criteria as set out in the Preferred Options. The identification of sites is accompanied by a criteria-based policy that facilitates the assessment of development proposals for changes of use away from employment.
The proposal to safeguard non-designated existing employment land (Policy EM2) was just as popular, receiving approval from 91% of respondents.	Noted and welcomed.
Some respondents made a request for the plan to provide housing where employment uses have failed or are underused.	Policies EM1 and EM2 allow the assessment of proposals with changes of use from employment being allowed in certain circumstances subject to the applicant providing sufficient evidence to help justify that change.
Whilst still popular amongst respondents (75% approval rating), several comments raised concern over the Grovefield Way employment allocation (Policy EM3) with consultees stating that no further incursions into the Green Belt should occur.	The history of Grovefield Way is a long and complex one. The Gloucester, Cheltenham and Tewkesbury Joint Core Strategy will remove the Green Belt designation here and, as part of the site already benefits from extant planning consent for B1 uses, its allocation for much needed employment use is logical and in accord with the broader strategy of the Cheltenham Plan.
Policy EM4, designed to promote a cyber-security sector in Cheltenham, received strong support (93% approval rating). Several respondents believe that having a cyber park would give Cheltenham an advantage in attracting high-value jobs in a unique industry.	Noted and welcomed.
The protection of the former Honeybourne	Noted and welcomed. Connecting spurs /routes

Railway Line via Policy EM5 line also proved to be a popular proposal, with 93% of consultees supporting it. However, many comments from both supporters and objectors requested that the cycle route to be extended, both into the town centre and in northerly and southerly directions.	will be added to the Cheltenham Plan Proposals Map where there is sufficient evidence to justify their inclusion as protected routes.
Local Green Space	
88% of respondents supported the more ambitious option to designate 14 areas of Local Green Space including 6 areas already designated as Public Green Space (Policy GE8A)	Noted and welcomed. The Cheltenham Plan is also taking forward existing Public Green Space designations (a forerunner of LGS that was brought forward in the adopted 2006 Borough Local Plan) as Local Green Space. This is to avoid creating a two-tier system of protection that could have caused confusion.
A Parish Council proposal for LGS at Leckhampton received significant support with 192 representations being submitted in total.	The Parish Council's suggestion has been taken on board and features as an integral part of the Cheltenham Plan's proposals for Leckhampton.
Other LGS suggestions were received in respect of land at Reeve's Field; the highway verge along the A40 at Benhall; land off Oakhurst Rise; and a verge at Harrington Drive.	The Harrington Drive LGS proposal has been taken forward in the Plan. The remaining LGS proposals either conflict with development proposals in the Plan or are inappropriate for designation and have been omitted.
Development Proposals	
Policies PR1 and PR2 proposing housing and mixed use allocations were not as popular as other policies in this consultation with many respondents disagreeing with the allocation of specific sites. Particular attention focussed on Reeve's Field and Prior's Farm both of which have current uses as sports / playing fields.	Both Reeve's Field and Prior's Farm Fields continue to feature in the Cheltenham Plan as part of the wider strategy for sustainable development. Both allocations recognise the importance of master-planning as an important means of reconciling any competing demands / interests across the wider area and both allocations propose the retention of large areas of green space.
An indicative proposal for housing and Local Green Space at Leckhampton received general acceptance provided that the number of new homes provided was not too high.	Noted. The number of new homes being accommodated at Leckhampton reflects discussions that took place as part of the JCS process and the fact that Leckhampton was cascaded from that process as a non-strategic site.
Planning agents focused on the need to boost the supply of housing in Cheltenham and advanced strategic and site-specific evidence on behalf of their respective clients.	The sites put forward through the JCS and Cheltenham Plan combine to meet the Borough's Objectively Assessed Housing Need up to 2031. Some Cheltenham Plan allocations reflect submissions to the Council as part of the SALA process and / or the Cheltenham Plan call for sites where inclusion of those sites would assist in the establishment of a strategy for sustainable development.

Amendments to the Principal Urban Area (PUA)	
62% of respondents supported the proposed amendments.	Noted. The vast majority of PUA amendments reflect development that has already been undertaken following the granting of planning permission.
Most of the objections related to a single property in The Reddings.	The property concerned is long-established and amendment to the boundary at this location corrects a historic omission from the PUA.
Article 4 Directions	
Some respondents consider that the St. Paul's area should have an HMO restriction as there are too many HMOs occupied by students and more housing should be available for families.	The Cheltenham Plan has introduced a policy on Houses in Multiple Occupation which facilitates the assessment of planning proposals for HMOs in St. Pauls ward according to a number of clearly defined criteria.
The number of HMOs in the town centre area is considered damaging to the infrastructure and character of Cheltenham by some.	See above. St. Pauls is one of the wards that comprise the town centre.
Overall, responses marginally supported introducing Article 4 directions to both restrict HMOs (58%) and protect conservation areas from householder development (65%).	The Council has introduced Policy HM5 to the Cheltenham Plan to help address the high proliferation of HMOs in St Pauls. The Council will consider introducing Article 4 directions in Conservation Areas subject to the findings of the relevant conservation area reviews / re-appraisals and the recommendations included in any resulting Conservation Area Management Plans.

APPENDIX 5



Cheltenham Plan Scoping Questionnaire

Work has begun on the new Cheltenham Plan and we want to hear your views on what the plan should contain. Before completing this feedback form we suggest you read the Cheltenham Plan Scoping Document.

Contact details:

Please provide your name and contact details (or details of the client you represent) below. We cannot accept anonymous responses. You must, as a minimum, provide a name or organisation AND an address or email.

Agent Details:

If you are acting on behalf of another person or organisation, please provide your details here.

Title (Mr,Mrs,Ms,Miss,Other).....

Name.....

Organisation (if relevant).....

.....

Job Title (if relevant).....

.....

Address.....

.....

.....

.....

Title (Mr,Mrs,Ms,Miss,Other).....

Name.....

Organisation (if relevant).....

.....

Job Title (if relevant).....

.....

Address.....

.....

.....

.....

1. Do you have any comments on the timetabling for producing the Cheltenham Plan?

Please see Process & Timetable section within Scoping Document

2. Do you have any comments on the current corporate vision and JCS vision and how they should relate to Cheltenham?

3. Please tell us *your* vision for Cheltenham

4. What do you think about the idea of a themed vision?

5. Name one thing in Cheltenham that you like

6. Name one thing in Cheltenham you think needs to change

7. Below is a list of objectives compiled from the existing Local Plan. Please indicate how important you think each of these objectives is (please cross one box for each objective):

	No View	Not Very Important	Quite Important	Very Important
To achieve a high standard of design in new development				
To reduce crime and the fear of crime				
To make provision for identified development needs				
To create more sustainable patterns of development, with priority use of previously-developed land				
To meet the needs of the elderly and people with disabilities				
To conserve and improve Cheltenham's architectural townscape and historical heritage				
To conserve and improve Cheltenham's landscape character and green environment				
To prevent coalescence of Cheltenham with other settlements				
To reduce waste and energy consumption and conserve natural resources				
To maintain and enhance the economic vitality of the borough				
To safeguard land and buildings in existing employment use, or if unoccupied, last in employment use				
To meet housing requirements, including the need for affordable housing				
To maintain and enhance the vitality and viability of the town centre as a sub-regional shopping centre				
To increase the range of facilities for recreation and leisure				
To encourage provision of a range of facilities and attractions for tourists				
To encourage the retention and provision of a range of community facilities and services				
To promote sustainable transport				
To ensure infrastructure in development is provided to a satisfactory standard				

8. Are there any other objectives that you would suggest?

9. How can we make the objectives more specific to Cheltenham?

The Scoping Document includes a list of policy areas that we think the Cheltenham Plan needs to cover

Please see Potential Policy Areas within the Scoping Document for full list

10. Do you think we have missed anything?

11. Do you have any suggestions, specific to Cheltenham, for how we should develop these policy areas?

It is Important that the objectives and policies of the plan can be delivered, in other words actually provided, protected or built.

12. What do you think are the key considerations in ensuring that our plan is deliverable?

COMMENTS:

13. If you have any further comments, please write them below:

14. How did you hear about the Cheltenham Plan Scoping Consultation?

- Website
- Email
- Social media
- Advertising/display
- Library
- Word of mouth
- Database contact
- Other:

Thank you for submitting your response for the Cheltenham Plan Scoping Consultation

To keep up to date with the Cheltenham Plan, please visit www.cheltenham.gov.uk/localplan



CHEL TENHAM
BOROUGH COUNCIL

Cheltenham Plan Issues and Options

Questionnaire

Work has begun on the new Cheltenham Plan and we want to hear your views on the Issues and Options document. Before completing this feedback form we recommend that you read the Cheltenham Plan Issues and Options Document. This can be found at www.consult.cheltenham.gov.uk

Contact details:

Please provide your name and contact details (or details of the client you represent) below. We cannot accept anonymous responses. You must, as a minimum, provide a name or organisation AND an address or email.

Agent Details:

If you are acting on behalf of another person or organisation, please provide your details here.

Title (Mr,Mrs,Ms,Miss,Other).....

Name.....

Organisation (if relevant).....

.....

Job Title (if relevant).....

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Address.....

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Title (Mr,Mrs,Ms,Miss,Other).....

Name.....

Organisation (if relevant).....

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Job Title (if relevant).....

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Address.....

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Return no later than 5pm on Monday 3rd August 2015 to:

POSTAL ADDRESS: Planning Policy, Cheltenham Borough Council, Municipal Offices, Promenade, Cheltenham, GL50 9SA; or

EMAIL: localplan@cheltenham.gov.uk

Q1: Do you agree with the draft vision themes and objectives?

Please select one option.

YES	NO
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Q1a: Please state your reasons why.

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Q2: Are there any vision themes and objectives which you feel have been missed and should be added?

Please select one option.

YES	NO
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Q2a: Please state your reasons why.

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Q3: Are there any reasonable alternatives that should be considered at this stage?

Please select one option.

YES	NO
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Q3a: Please state your reasons why.

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Q4: Does this policy approach address the identified issues?

Please select one option.

YES	NO
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Q4a: Please state your reasons why.

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Q5: Which policy option do you support?

Please select one option.

- OPTION 1: Continue with general protection of office, industrial and storage space (B uses only) as established by adopted local plan policy EM2
- OPTION 2: Amend the general policy of B uses only (as established by adopted Local Plan policy EM2) to allow other forms of economic development
- OPTION 3: Protect the best and evaluate the rest
- OTHER OPTION

Q5a: Please state your reasons why.

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Q6: Are there any issues and/or options which have been missed that you feel should be added?

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Q7: Are there any reasonable alternatives that should be considered at this stage?

Please select one option.

YES	NO
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Q7a: Please state your reasons why.

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Q8: If you support a safeguarding approach, which employment sites do you think should safeguarded for employment use? *Please refer to the employment map(s).*

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Q9: Does this policy approach address the identified issues?

Please select one option.

YES	NO
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Q9a: Please state your reasons.

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.....

Q10: Which policy option do you support?

Please select one option.

- OPTION 4: Introduce selective management of Cheltenham’s economy
- OPTION 5: No policy intervention
- OTHER OPTION

Q10a: Please state your reasons why.

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Q11: Are there sectors that you think should be promoted ahead of others?

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Q12: Are there any issues and/or options which have been missed that you feel should be added?

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Q13: Are there any reasonable alternatives that should be considered at this stage?

Please select one option.

YES	NO
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Q13a: Please state your reasons why.

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Q14: Does this policy approach address the identified issues?

Please select one option.

YES	NO
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Q14a: Please state your reasons why.

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Q15: Which policy option do you support?

Please select one option.

- OPTION 6: Introduce a cyber security cluster
- OPTION 7: Do not promote cluster development
- OTHER OPTION

Q15a: Please state your reasons why.

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Q16: Do you agree the Cheltenham Plan should promote a cyber security cluster?

Please select one option.

YES	NO
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Q16a: Please state your reasons why.

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Q17: Do you think the Cheltenham Plan should promote other clusters alongside cyber security cluster?

Please select one option.

YES	NO
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Q17a: Please state your reasons why.

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Q18: Are there any issues and/or options which have been missed that you feel should be added?

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Q19: Are there any reasonable alternatives that should be considered at this stage?

Please select one option.

YES	NO
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Q19a: Please state your reasons why.

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Q20: Does this policy approach address the identified issues?

Please select one option.

YES	NO
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Q20a: Please state your reasons why.

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Q21: Which policy option do you support?

Please select one option.

- OPTION 8: Allocate all designated 'Public Green Spaces' as 'Local Green Spaces'
- OPTION 9: Maintain existing local 'Public Green Spaces' and only allocate 'Local Green Spaces' that meet the Framework's criteria
- OPTION 10: Maintain existing approach of designating local 'Public Green Spaces'
- OTHER OPTION

Q21a: Please state your reasons why.

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Q22: Which areas (including sites identified on the Local Green Space Map) do you think should be designated a Local Green Space? Please state your reasons why.

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Q23: Are there any issues and/or options which have been missed that you feel should be added?

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Q24: Are there any reasonable alternatives that should be considered at this stage?

Please select one option.

YES	NO
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Q24a: Please state your reasons why.

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Q25: Should the Cheltenham Plan designate the Honeybourne Line as a Local Green Space (as opposed to its current designation, Public Green Space, in the adopted Local Plan)?

Please select one option.

YES	NO
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Q25a: Please state you reasons why.

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Q26: Do you agree the Honeybourne Line should continue to be protected for future transport schemes?

Please select one option.

YES	NO
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Q26a: Please state you reasons why.

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Q27: Do you agree that the sites that have been coloured ‘green’ on the housing maps represent the most suitable to consider allocating for future housing development?

Please select one option.

YES	NO
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Q27a: Please state you reasons why.

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Q27b: If no, which sites coloured green on the housing map do you disagree with and why? *Please state the site reference and your reason.*

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Q28: Do you think a site that is not coloured ‘green’ on the housing maps should have been?

Please select one option.

YES	NO
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Q28a: Please state the site reference and your reason.

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Q29: Do you agree that the sites that have been coloured 'amber' on the housing maps represent potential for allocating for future housing development?

Please select one option.

YES	NO
-----	----

Q29a: Please state you reasons why.

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Q29b: If no, which sites coloured 'amber' on the housing map do you disagree with and why? Please state the site reference and your reason.

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Q30: Do you think a site that is not coloured 'amber' on the housing maps should have been?

Please select one option.

YES	NO
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Q30a: Please state the site reference and your reasons why.

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Q31: Do you agree that the sites that have been coloured 'red' on the housing maps are not suitable for allocation for future housing development?

Please select one option.

YES	NO
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Q31a: Please state your reasons why.

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**Q31b: If no, which sites coloured red on the housing maps do you disagree with?
Please state the site reference and your reason.**

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Q32: Do you think there are any other sites which should be coloured red on the housing maps?

Please select one option.

YES	NO
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Q32a: Please state the site reference and your reasons why.

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Q33: Do you think there are other more suitable sites not shown on the maps that could be considered as future housing allocations?

Please select one option.

YES	NO
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Q33a: If so, please supply details such as an address and a site plan.

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Q34: Do you think that any sites being considered in this area could be suitable for gypsy, traveller and travelling showpeople site use?

Please select one option.

YES	NO
-----	----

Q34a: Please state your reasons and list site references of any specific sites.

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.....

Q35: Do you think there are other more suitable sites for gypsy, traveller and travelling showpeople not shown on the maps that could be considered for future use?

Please select one option.

YES	NO
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Q35a: If so, please supply details such as an address and a site plan.

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Q36: Which, if any existing employment site/s (sites coloured brown on the employment maps) should or should not be safeguarded from change of use? Please state the reference, your preference and give your reasons why.

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Q37: Do you agree that the sites that have been coloured 'green' on the employment maps represent the most suitable to consider allocating for future employment development?

Please select one option.

YES	NO
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Q37a: Please state your reasons why.

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Q37b: If no, which sites coloured green on the employment maps do you disagree with and why? Please state the site reference and your reason.

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Q38: Do you think a site that is not coloured 'green' on the employment maps should have been?

Please select one option.

YES	NO
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Q38a: Please state the site reference and your reasons why.

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Q39: Do you agree that the sites that have been coloured 'amber' on the employment maps represent potential for allocating for future employment development?

Please select one option.

YES	NO
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Q39a: Please state your reasons why.

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Q39b: If no, which sites coloured amber on the employment maps do you disagree with and why? Please state the site reference and your reasons why.

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Q40: Do you think a site that is not coloured ‘amber’ on the employment maps should have been?

Please select one option.

YES	NO
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Q40a: If so, please state the site reference and your reasons why.

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Q41: Do you agree that the sites that have been coloured ‘red’ on the employment maps are not suitable for allocation for future employment development?

Please select one option.

YES	NO
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Q41a: Please state your reasons why.

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Q41b: If no, which sites coloured red on the employment maps do you disagree with? Please state the site reference and your reason.

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Q42: Do you think there are any other sites which should be coloured red on the employment maps?

Please select one option.

YES	NO
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Q42a: Please state the site reference and your reasons why.

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Q43: Do you think there are other more suitable sites not shown on the maps that could be considered as future employment allocations?

Please select one option.

YES	NO
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Q43a: If so, please supply details such as an address and a site plan.

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Q44: Please provide details of any further comments you wish to make.

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How did you hear about the Cheltenham Plan Issues and Options Consultation?

- Website
- Email
- Social media
- Advertising/display
- Library
- Word of mouth
- Database contact

Other:

Thank you for submitting your response for the Cheltenham Plan Issues and Options Consultation.

To keep up to date with the Cheltenham Plan, please visit www.cheltenham.gov.uk/cheltenhamplan



CHEL TENHAM
BOROUGH COUNCIL

Cheltenham
Borough Council

**Cheltenham Plan (Part
One): Preferred Options
Questionnaire**

Planning Policy

January 2017

Contact details:

Please provide your name and contact details (or details of the client you represent) below. We cannot accept anonymous responses. You must, as a minimum, provide a name or organisation AND an address or email. If you are acting on behalf of another person or organisation, please leave your details here.

Title (Mr, Mrs, Ms, Miss, Other)**Name****Organisation (if relevant)****Job Title (if relevant)****Address****Postcode****Telephone****Email**

The purpose of this consultation is to hear your views on the Cheltenham Plan. [The consultation document](#) provides the Council's preferred options for the future Plan and includes a set of questions for you to answer.

This consultation is in addition to those which are required by Government policy. The Council has decided that it is important to get feedback on the Cheltenham Plan at an early stage in the process. This will allow officers to work towards a final draft Plan which has the support and input of the local community, stakeholders and statutory bodies.

Each question is followed by a text box should you wish to leave additional comments after your responses. If you require more space then please attach additional sheets at the end of this document, with reference to the question number.

Question 1

Do you agree with the [Vision Themes and Objectives](#)? (page 5)

Yes No

Please enter any additional comments below.

Question 2

Do you agree with the [Preferred Strategy for the economy?](#) (page 14)

Yes No

Please enter any additional comments below.

Question 3

Do you agree with [Proposed Policy EM1 Safeguarding Key Existing Employment Land and Buildings?](#) (see [Appendix A, Proposals Map, and Site Maps](#)) (page 21)

Yes No

Please enter any additional comments below.

Question 4

Do you agree with [Proposed Policy EM2](#) Safeguarding Non-Designated Existing Employment Land and Buildings? (page 24)

Yes No

Please enter any additional comments below.

Question 5

Do you agree with [Proposed Policy EM3](#) New Employment Allocations? (see [Proposals Map and Site Maps](#)) (page 27)

Yes No

Please enter any additional comments below.

Question 6

Do you agree with [Proposed Policy EM4](#) Promoting the Cyber-Security Sector? (page 29)

Yes No

Please enter any additional comments below.

Question 7

Do you agree with [Proposed Policy EM5](#) Protecting the Route of the Former Honeybourne Rail Line? (see [Proposals Map](#)) (page 30)

Yes No

Please enter any additional comments below.

Question 8

Do you agree with Proposed Policy [GE8A](#) or [GE8B](#) Local Green Space? (see [Appendix B](#), [Appendix C](#), [Proposals Map](#), and [site maps](#)) (page 34-35)

GE8A GE8B

Please enter any additional comments below.

Question 9

Do you agree with Proposed [Policy PR1](#) Land Allocated for Housing Development? (see [Appendix D](#), [Appendix E](#), [Proposals Map](#), and [site maps](#)) (page 41)

Yes No

Please enter any additional comments below.

Note

If you know of a site which is suitable for housing development and should be included in the Cheltenham Plan please submit information via the '[Call for Sites](#)' form.

Question 10

Do you agree with [Proposed Policy PR2](#) Land Allocated for Mixed Use Development? (see [Appendix B](#), [Appendix E](#), [Proposals Map](#), and [site maps](#)) (page 44)

Yes No

Please enter any additional comments below.

Note

If you know of a site which is suitable for mixed use development and should be included in the Cheltenham Plan please submit information via the '[Call for Sites](#)' form.

Question 11

Do you agree with the preferred options for minor amendments to the Principal Urban Area? (see [Appendix F, Proposals Map, and site maps](#)) (page 46-47)

Yes No

Please enter any additional comments below.

Question 12

Do you think that an Article 4 direction to restrict HMOs is required in any part of the Borough? (page 48-50)

Yes No

Please enter any additional comments below.

Question 13

Do you think that an Article 4 direction in any Conservation Area is required to stop the erosion of its special character through householder development in any part of the Borough? (page 48-52)

Yes No

Please enter any additional comments below.

Question 14

Do you think that an Article 4 direction to restrict the loss of office or employment uses to residential is required in any part of the Borough? (page 48-50)

Yes No

Please enter any additional comments below.

Question 15

If you have any comments on the Cheltenham Plan evidence base please enter them below.

Thank you for completing the Preferred Options questionnaire. To submit, please email this document to localplan@cheltenham.gov.uk.

Alternatively, this document can be posted to the following address:

*Planning Policy
Cheltenham Borough Council
Municipal Offices
Promenade
Cheltenham
GL50 9SA*

If you have any questions or problems please contact the Planning Policy team using the above details or telephone on 01242 264328.

**Cheltenham Borough Council
Council – 11 December 2017**

**Recommendations of the Independent Remuneration Panel (IRP)
regarding Members’ Scheme of Allowances**

Accountable member	Council
Accountable officer	Chief Executive, Pat Pratley
Accountable scrutiny committee	Not applicable
Ward(s) affected	Not applicable
Significant Decision	No
Executive summary	<p>The law requires that Members’ schemes of allowances are reviewed annually unless they are linked to some form of automatic indexation in which case they must be reviewed at least once in every four years. Before an authority can review its scheme of allowances it must first have considered a report from an Independent Remuneration Panel (IRP). A full review was carried out by the IRP in 2014 and so the next full review is not due until 2018.</p> <p>The IRP were convened in November this year as there were some issues they had been requested to look at as part of this review. At the same time they also reviewed any increases to the Basic Allowance and Special Responsibility Allowances to be applied for 2018/2019 based on the revised method of indexation adopted by Council last year i.e the proposed % increase for staff.</p> <p>The Council is required to consider the recommendations and, if acceptable, to resolve to adopt them. If the Council rejects the recommendations then the current scheme will remain in place.</p>
Recommendations	<p>I therefore recommend that:</p> <ol style="list-style-type: none"> 1. Council considers the following recommendations set out in the attached IRP report and determines whether to adopt them; ii) That the Basic Allowance payable to all Councillors is increased from April 2018 by a % equal to the proposed increase to staff relating to 2018/19. iii) That the level of all SRAs be increased by the same %. iv) That the allowances for Mayor and Deputy Mayor are increased by the same % v) That the SRA for the Licensing Committee Chair be split between the Chair and Vice-Chair on a 60/40 basis until a full evidence based review can be carried out as part of the next full

review in September 2018.

- vi) That when travelling to approved duties outside of the borough using public transport all travel costs incurred within the borough can be included subject to the requirement to use the most cost effective form of travel for all journeys.
2. Council notes the next full review required by legislation will start in September 2018 reporting to Council in December 2018.
3. Council authorises the Democratic Services Manager to implement any necessary changes to the scheme of allowances and make any necessary changes to Council's constitution.

Financial implications

The additional cost of the IRP proposal is set out in sections 4 and 5 of the report.

The Cabinet Budget Strategy report on 10th October 2017 outlined the budget modelling strategy for the interim 2018/19 council budget. This includes a 1% increase in employee costs to mirror the estimated local government pay award for 2018/19. This 1% increase will also be applied to the 2018/19 budget for members' allowances, including special responsibility allowances and mayor and deputy mayor allowances, at a total additional cost of £3,297 pa.

A further 1% has been set aside in the council's general balances as contingency, should the pay award and therefore the equivalent percentage increase in members' allowances be higher than estimated.

There is therefore budget provision for this proposed increase included in the 2018/19 budget, subject to approval by Council as part of the budget setting meeting in February 2018.

The actual increase in members allowances will be calculated by the Chief Financial Officer once the staff pay award for the next financial year is confirmed. There would be a minimal impact on the council's medium term financial strategy, should the actual increase in members allowances be higher than currently proposed.

**Contact officer: Sarah Didcote, Deputy Section 151 Officer,
sarah.didcote@cheltenham.gov.uk,
01242 264125**

<p>Legal implications</p>	<p>The Local Authorities (Members' Allowances) England Regulations 2003 SI 2003/1021 set out a framework for the creation, implementation and amendment of schemes of allowances for Members and Co-optees of local authorities. The main provisions are as follows:</p> <p>Reg 10 imposes the requirement that local authorities make a scheme for payment of basic allowances. Where the authority intends to pay allowances in respect of other matters such as special responsibilities or co-optees then these should be included within the scheme.</p> <p>Schemes of allowances must be reviewed by an Independent Remuneration Panel (IRP) annually and no less than once every four years where they are index linked. Reg 19 stipulates that before an authority can amend or revoke its scheme it must have first considered a report from its IRP and have regard to its recommendations, although the authority is not bound to follow them.</p> <p>R.20(1) requires authorities to establish an IRP either itself or in collaboration with other authorities. The IRP must consist of at least three Members who are not Members of the authority in respect of which they are making recommendations nor disqualified from being or becoming a member of an authority.</p> <p>Under R.20(3) Authorities are empowered to pay the expenses incurred by the IRP in carrying out its functions and this includes such expenses or allowances as the authority shall determine.</p> <p>R.16 and 22 impose a number of requirements as to the publication of the newly adopted scheme and the recommendations received from the IRP considered at the time of formulating and adopting the scheme. The publicity requirements are intended to publicise the scheme adopted and highlight any differences between it and the one recommended by the IRP.</p> <p>Contact officer: Peter Lewis, One Legal peter.lewis@cheltenham.gov.uk, Tel: 01684 272012</p>
<p>HR implications (including learning and organisational development)</p>	<p>If the proposed changes are accepted the Democratic Services Manager will need to instruct GOSS HR to update payroll data on Business World.</p> <p>Contact officer: Carmel Togher ,HR Business Partner Carmel.togher@cheltenham.gov.uk, 01242 26 4355</p>
<p>Key risks</p>	<p>The determination of allowances is a sensitive subject both from the perspective of Councillors themselves and the public who elect them. In view of this it is important that any scheme adopted is objectively reasonable and based upon some logical and fair mechanism.</p>
<p>Corporate and community plan Implications</p>	<p>None</p>
<p>Environmental and climate change implications</p>	<p>The Scheme will continue to encourage members to use public transport where possible.</p>

1. Background

- 1.1** The Local Authorities (Members' Allowances) England Regulations 2003 sets out the framework within which local authorities can establish and amend schemes providing for the payment of allowances to Elected and Co-opted Members of their councils. In particular the regulations provide that schemes which are linked to an index to determine annual increases in allowances must be reviewed at least once in every four years.
- 1.2** When reviewing its scheme a council may not adopt a new scheme or re-adopt an old scheme without first having considered the recommendations of an Independent Remuneration Panel established for that purpose.
- 1.3** The existing scheme of Members' allowances in place at Cheltenham Borough Council was adopted in March 2007 and provides for basic allowances for all elected Members, special responsibility allowances (SRAs) paid in respect of identified roles and responsibilities and travel and dependent carers payments. The scheme was last reviewed in December 2014 following the full review by the IRP panel and the revised scheme agreed by Council in December that year.
- 1.4** When Council considered the IRP report as part of the budget report on 12 February 2016 they decided that they would award a 1% increase to be in line with the salary increase given to staff. They also wished to apply this increase to all SRAs and the civic allowances.
- 1.5** In 2017, the IRP recommended that the scheme be changed to adopt Council's preferred method of indexation i.e. the increase should be in line with that given to staff rather than the % increase in the median gross weekly earning for the South West which had been adopted by the panel previously. This was agreed by Council and the Members Allowance Scheme in the Constitution was amended accordingly. All basic allowances, SRAs and Civic Allowances were increased by 1% from April 2017 in line with the increase given to staff.
- 1.6** The budget strategy that went to Cabinet in October did not make any specific reference to Members Allowances but for interim budget modelling, a 1% increase in staff pay was assumed with a contingency held in general balances for an amount equivalent to a further 1%. The IRP were convened in November this year to review some issues requested by Members and their recommendations are set out in their report.
- 1.7** The next full review required by legislation will commence in October 2018 reporting to Council in December 2018.

2. Increasing allowances in line with the staff settlement

- 2.1** Following the Council decision in 2016, section 9 of the Members Allowance Scheme in the Constitution was amended as follows:

"If there are no significant issues to review, the recommendation to Council should be that all allowances should be increased by the same % increase proposed for staff in the following financial year".
- 2.2** It is possible that the proposed pay settlement to staff may be a 2 year settlement so it might not be as straightforward as an across the board % increase for 2018/19. Also in previous years final agreement has not been reached until after the start of the next financial year and so staff have received appropriate back pay.
- 2.3** The IRP did not consider these options in detail so their recommendation as it stands is that Councillors would be treated exactly as staff. i.e.
 - if agreement on the staff settlement was delayed, the increase in allowance would be delayed and Members would receive any appropriate back pay once the settlement is finalised

if it was a 2 year settlement, then Members Allowances would mirror that and the increase in allowance for 2018/2019 would mirror the increase to staff in that year. The future allowances would then be reviewed anyway as part of the 2018 review.

- 2.4** The actual increase in members allowances will be calculated by the Chief Financial Officer once the staff pay award is confirmed. However, these scenarios are not expected to have a significant impact on the council's medium term financial strategy.

3. Alternative options considered

- 3.1** The review undertaken by the IRP constitutes a thorough and reasoned analysis of the allowance rates applicable to Councillors and those co-opted to serve the council. In reaching its conclusions it has taken advice and gathered a range of information and considered a range of options which are detailed in their report.

4. Consultation and feedback

- 4.1** Detailed in the IRP report.

5. The recommendations and rationale

- 5.1** The recommendations from the IRP for 2018/19 and the rationale for them are set out in the IRP report in Appendix 2 and summarised in the Executive Summary of this report.

- 5.2** If the panel's recommendations are accepted the estimated new allowances assuming a 1% increase for staff will be as follows:

ROLE	Current allowance £	Recommendations from the IRP from April 2018 with a 1% increase
Basic	5321	5374
Leader	16758	16926
Cabinet Member	13190	13322
Chair of Planning Committee	3086	3117
Vice-Chair of Planning Committee	1542	1558
Chair of Licensing Committee	1388	1402
Chair of Overview and Scrutiny Committee	2777	2804
Vice-chair of O&S Committee	1388	1402
Chair of Audit Committee	695	702
Chair of Standards Committee	308	311
Group Leaders (x2)	617	623
Chair of Council)	463	468
Mayor (duties of civic head)	6743	6810
Includes the clothing and other expenses allowance	(500)	
Deputy Mayor (duties of deputy civic head)	1349	1362
Includes the clothing and other expenses allowance	(100)	

6. Financial implications

- 6.1 The financial implications of the proposals based on a 1% staff settlement from the IRP are set out in the table below. These will increase accordingly if the staff settlement is higher.

	Existing cost	Revised cost	Additional cost
Basic allowances	212834	214962	2128
SRAs	108779	109867	1088
Civic Allowances up to	8091	8172	81
Total member allowances	329705	333002	3297

** Total Member allowances include Mayor and Deputy Mayor's Allowances

7. Performance management – monitoring and review

- 7.1 The Members Allowance Scheme will be monitored by Democratic Services and any issues arising will be raised with IRP when necessary.

Report author	Contact officer: Rosalind Reeves, Democratic Services Manager , Rosalind.reeves@cheltenham.gov.uk, 01242 774937
Appendices	<ol style="list-style-type: none"> 1. Risk Assessment 2. IRP Report
Background information	<ol style="list-style-type: none"> 1. Part 6 CBC Constitution – Members' Scheme of Allowances

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 some provision is not made for increasing the basic allowance and SRAs then new councillors may not be attracted to stand for the role or existing members may step down.	DSM	2014	3	2	6	Reduce	The views of existing Councillors should continue to be fed back to the IRP and they should be made aware of any difficulties in attracting future councillors. Review in 2018 as part of the 4 yearly review.	Nov 2018	Democratic Services Manager		
	If Members Allowances are increased during a continuing climate of financial cuts there may be a public or staff perception that Councillors are not playing their part in helping to bridge any budget gaps.	DSM	2014	2	2	4	Accept	The basic allowance is now linked to the staff pay settlement and this is detailed in the report.	Dec 18	Democratic Services Manager		

Cheltenham Borough Council

Independent Remuneration Panel

Our review of the Members Allowance Scheme

November 2017

1. The Panel

- 1.1. The Cheltenham Borough Council (CBC) Independent Remuneration Panel was established pursuant to the provisions of the Local Authorities (Members' Allowances) (England) Regulations 2003. The panel Members were appointed by the Borough Solicitor and Monitoring Officer in December 2006 under delegated authority from Council. The current panel Membership is:

Mr Paul Johnstone (Chairman)	Director of Operations, RR Donnelley Global Document Solutions Panel Previous Member for Tewkesbury BC IRP
Mr Quentin Tallon (Vice Chair)	Cheltenham TUC (retired) and Panel Member for Gloucestershire CC IRP
Mrs Patricia Dundas	Gloucestershire Hospitals
Mrs Joyce Williams	Retired Public Servant

2. Our Terms for Reference

- 2.1. The Panel's original terms of reference as set by the Borough Solicitor and Monitoring Officer were;

To make recommendations to Council on the appropriate level and nature of allowances payable to Borough Council Councillors in Cheltenham under the scheme of allowances for implementation from 1 April 2007 which

- conform to the requirements of the Local Authorities (Members' Allowances) (England) Regulations 2003
- recognise the duties and levels of responsibility which fall upon them
- are clear, unambiguous, easy to administer, explain and justify to the local community.

3. History to date

- 3.1. The Independent Remuneration Panel (IRP) carried out a 4 yearly full review of Members Allowances in 2014 as required under the regulations. At its meeting in December 2014, Council accepted the IRP recommendation to increase the Basic Allowance by 1% from April 2015. They decided that this should not be applied to SRAs which remained at their 2014/15 levels.
- 3.2. When Council considered the IRP report as part of the budget report on 12 February 2016 they decided that they would award a 1% increase to be in line with the salary increase given to staff. They also wished to apply this increase to all SRAs and the civic allowances.

3.3. In 2017, the IRP recommended that the preferred method of indexation i.e. ~~the increase~~ should be changed to adopt Council's preferred method of indexation i.e. ~~the increase~~ should be in line with that given to staff rather than the % increase in the median gross weekly earnings for the South West which had been adopted by the panel previously. This was agreed by Council and the Members Allowance Scheme in the Constitution was amended accordingly. All basic allowances, SRAs and Civic Allowances were increased by 1% from April 2017 in line with the increase given to staff.

3.4. The budget strategy that went to Cabinet in October did not make any specific reference to Members Allowances but for interim budget modelling, a 1% increase in staff pay was assumed with a contingency held in general balances for an amount equivalent to a further 1%.

4. Consultation

4.1. The Democratic Services Manager wrote to all elected Members via e-mail on 31 October 2017 asking for any issues that Members may wish to be considered by the panel to be notified by Friday 10 November. We received responses from 5 Members.

4.2. The responses can be summarised as follows:

- *Any increase should not exceed that of our staff*

- *No issues with the level of the allowance*

- *a suggestion that purchased permits for Members be usable on all CBC managed car parks*

- *no significant changes in duties that impact the allowances*

- *there should be equity in the way that travel expenses are treated for attending duties outside the borough with regard to claims for mileage and public transport*

- *No significant issues on the monetary amounts*

- *The signing up arrangements for members' ICT, and receiving iPads need to be reviewed*

4.3. We felt the car parking and ICT procedures were outside the scope of our review but include them here for completeness and the other points are covered in this report.

5. Licensing Committee

5.1. We were informed that a review of the Licensing Committee had taken place and as a result from September 2017, in addition to the main committee, two sub-committees were set up with Members of the main committee split between the two and a chair of each sub-committee elected on a permanent basis. We understand the Chair and Vice Chair of Licensing Committee would each take the chair of one of the sub-committees. Licensing Committee agreed the new structure and requested that the IRP should review the SRAs when they next met.

5.2. We understand that in September, the current chair requested that the SRA be split equally between the chair and vice chair to reflect the additional responsibilities for chairing one of the sub-committees. This was implemented on an informal basis.

- Page 1013
- 5.3. As the new structure has only been in place for 13 months, it is not yet bedded in and there is as yet insufficient evidence as to how the changes may have affected the factors determining the SRA i.e. time, responsibility and risk, and skills and experience and how the allowance should be split between the chair and vice-chair. In addition following the resignation of the current chair in September, Licensing has been without a chair since that date.
 - 5.4. The IRP had a similar request regarding Planning Committee in the past and we opted to recommend that the informal arrangement of sharing the allowance between the chair and vice-chair on a 2/3:1/3 basis should be continued until more evidence was available.
 - 5.5. We recommend that a similar approach is adopted for the Licensing Committee and would recommend an interim 60/40 split to reflect the additional responsibilities of the vice-chair in chairing a sub-committee but also reflecting the additional responsibilities for the chair of the main committee.
 - 5.6. When we meet in September 2018 we can review this again. At that point we would request information on the numbers of meetings of the main committee and sub-committees that have taken place in the first year of operation and details about the workload involved for the Chair and Vice-chair. With this evidence we would also be in a position to assess whether the overall work load for these roles had increased and the relative split of work and therefore whether the SRAs needed adjusting. We would ask the chair and vice-chair keep a note of their time spent during the coming year to assist us in this review.

6. ICT provision

- 6.1. We would remind Members that we included an additional £100 p.a. in the basic allowance to cover the cost of home ICT provision and this will receive a proportionate increase when the basic allowance increases. We feel it is important to make sure any newly elected members are made aware of this provision in their basic allowance as part of their induction.
- 6.2. No other points have been raised and so there are no specific points for the panel to consider in relation to ICT.

7. Travel Expenses

- 7.1. In 2010 we were requested to review an issue raised by a member concerning travel outside the borough on council business. When claiming mileage for such a journey the scheme at that time required members to deduct the first 5 miles of any journey. We felt that it was appropriate for members to cover mileage within the borough from their basic allowance for ward business and travelling to the municipal offices etc. However if they are required to travel outside the borough on approved duties, we recommended that members should be able to claim the mileage from home to the destination where they are carrying out council business and the same for the return journey.
- 7.2. We recommended that **When Members are travelling outside the borough on council business the mileage claimed should be home to their destination and the same for their return journey** and this was adopted in the scheme.
- 7.3. We said at the time that we would also encourage members to use more sustainable travel wherever possible, particularly train travel for longer distances.

- 7.4. A Member highlighted to us the slight discrepancy in the scheme in that a member cannot currently claim for public transport within the borough when attending approved duties outside the borough. For example if they were travelling by train from Cheltenham, for which they could claim expenses, but incurred additional expenses in travelling to the station then those expenses should also be eligible for them to claim. In this way equity would be achieved with expenses for car travel and travel by public transport would be encouraged.
- 7.5. We fully support this principle and would therefore recommend that the appropriate wording is included in the scheme and guidance notes as appropriate.

8. Other changes to the Scheme

8.1. There were no other changes that we were asked to consider.

9. Our recommendations

1. To increase the basic allowances, SRAs and Mayoral Allowance from April 2018 by the same % awarded to staff i.e. in line with the anticipated employee annual pay award as set out in the indexation method in the scheme.
2. That the allowance for the Licensing Committee Chair be split between the Chair and Vice-Chair on a 60/40 basis until a full evidence based review can be carried out as part of the next full review in September 2018.
3. That when travelling to approved duties outside of the borough using public transport all travel costs incurred within the borough can be included subject to the requirement to use the most cost effective form of travel for all journeys.

Appendices	1. Current scheme
Background papers	None
Contact officer	Rosalind Reeves - Democratic Services Manager, 01242 77 4937, Rosalind.reeves@Cheltenham.gov.uk

Cheltenham Borough Council
Cabinet – 5th December 2017
Council – 11th December 2017
Treasury Mid-Term Report 2017/18

Accountable member	Finance, Rowena Hay
Accountable officer	Section 151 Officer, Paul Jones
Accountable scrutiny	Treasury Management Panel
Ward(s) affected	None
Key Decision	Yes
Executive summary	The Treasury Management Strategy for 2017/18 has been determined by the adoption of the Chartered Institute of Public Finance and Accountancy's (CIPFA) Code of Practice on Treasury Management 2009 (revised 2011), which includes the requirement for determining a treasury strategy on the likely financing and investment activity for the forthcoming financial year. The Code also recommends that members are informed of Treasury Management activities at least twice a year. This report therefore ensures this authority has adopted the code and complies with its requirements.
Consultation	The Treasury Management Panel has considered this report on 20th November 2017.
Recommendations	Treasury Management Panel approves the following recommendation to Cabinet/Council: 1. Note the contents of the summary report of the treasury management activity during the first six months of 2017/18.
Financial implications	All financial implications are detailed throughout the report Contact officer: Andrew Sherbourne, andrew.sherbourne@cheltenham.gov.uk, 01242 264337
Legal implications	None specific arising from the report recommendations. Contact officer: Peter Lewis, peter.lewis@tewkesbury.gov.uk, 01242 264216

HR implications (including learning and organisational development)	No direct HR implications arising from this report Contact officer: Julie McCarthy, julie.mccarthy@cheltenham.gov.uk. 01242 264355
Key risks	see appendix 2
Corporate and community plan Implications	None
Environmental and climate change implications	None

1. Background

- 1.1** The Treasury Management Strategy for 2017/18 has been developed by the adoption of the Chartered Institute of Public Finance and Accountancy's (CIPFA) Code of Practice on Treasury Management 2009 (revised 2011), which includes the requirement for determining a treasury strategy on the likely financing and investment activity for the forthcoming financial year. The Code also recommends that members are informed of Treasury Management activities at least twice a year. This report therefore ensures this authority has adopted the code and complies with its requirements, one of which is the provision of a Mid-year report to Members.
- 1.2** The Council operates a balanced budget, which broadly means cash raised during the year will meet its cash expenditure. Part of the treasury management operations ensure this cash flow is adequately planned, with surplus monies being invested in low risk counterparties, providing adequate liquidity initially before considering optimising 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 borrowing need of the Council, essentially the longer term cash flow planning to ensure the Council can meet its capital spending operations. This management of longer term cash may involve arranging long or short term loans, or using longer term cash flow surpluses, and on occasion any debt previously drawn may be restructured to meet Council risk or cost objectives.

Accordingly, treasury management is defined 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."

2. Economic update for the first six months

- 2.1** The following key points have been provided by the councils Treasury Advisors, Capita Treasury Solutions.

- 2.2** After the UK economy showed strong growth in 2016, growth in 2017 has been disappointingly weak; quarter 1 came in at +0.3% (+1.7% y/y) and quarter 2 was +0.3% (-1.5% y/y) which meant that growth in the first half of 2017 was the slowest for the first half of any year since 2012. The main reason for this has been the sharp increase in inflation, caused by the devaluation of sterling after the referendum, feeding increases in the cost of imports into the economy. This has caused, in turn, a reduction in consumer disposable income and spending power and so the services sector of the economy, accounting for around 75% of GDP, has seen weak growth as consumers cut back on their expenditure. However, more recently there have been encouraging statistics from the manufacturing sector which is seeing strong growth, particularly as a result of increased demand for exports. It has helped that growth in the EU, our main trading partner, has improved significantly over the last year. However, this sector only accounts for around 11% of GDP so expansion in this sector will have a much more muted effect on the average total GDP growth figure for the UK economy as a whole.
- 2.3** The Monetary Policy Committee (MPC) meeting of 14 September 2017 surprised markets and forecasters by suddenly switching to a much more aggressive tone in terms of its words around warning that Bank Rate will need to rise. The Bank of England Inflation Reports during 2017 have clearly flagged up that they expected CPI inflation to peak at just under 3% in 2017, before falling back to near to its target rate of 2% in two years' time. Inflation actually came in at 2.9% in August, (this data was released on 12 September), and so the Bank revised its forecast for the peak to over 3% at the 14 September meeting MPC. This marginal revision can hardly justify why the MPC became so aggressive with its wording; rather, the focus was on an emerging view that with unemployment falling to only 4.3%, the lowest level since 1975, and improvements in productivity being so weak, that the amount of spare capacity in the economy was significantly diminishing towards a point at which they now needed to take action. In addition, the MPC took a more tolerant view of low wage inflation as this now looks like a common factor in nearly all western economies as a result of increasing globalisation. This effectively means that the UK labour faces competition from overseas labour e.g. in outsourcing work to third world countries, and this therefore depresses the negotiating power of UK labour. However, the Bank was also concerned that the withdrawal of the UK from the EU would effectively lead to a decrease in such globalisation pressures in the UK, and so would be inflationary over the next few years.
- 2.4** At the time of this report being written the MPC took the decision on 2nd November 2017 to increase Bank Rate to 0.5%. The big question after that will be whether this will be a one off increase or the start of a slow, but regular, increase in Bank Rate. As at the start of October, short sterling rates are indicating that financial markets do not expect a second increase until May 2018 with a third increase in November 2019. However, some forecasters are flagging up that they expect growth to improve significantly in 2017 and into 2018, as the fall in inflation will bring to an end the negative impact on consumer spending power while a strong export performance will compensate for weak services sector growth. If this scenario were to materialise, then the MPC would have added reason to embark on a series of slow but gradual increases in Bank Rate during 2018. While there is so much uncertainty around the Brexit negotiations, consumer confidence, and business confidence to spend on investing, it is far too early to be confident about how the next two years will pan out.
- 2.5** Economic growth in the EU, (the UK's biggest trading partner), has been lack lustre for several years after the financial crisis despite the ECB eventually cutting its main rate to -0.4% and embarking on a massive programme of QE. However, growth picked up in 2016 and now looks to have gathered ongoing substantial strength and momentum

thanks to this stimulus. GDP growth was 0.5% in quarter 1 (2.0% y/y) and 0.6% in quarter 2 (2.3% y/y). However, despite providing massive monetary stimulus, the European Central Bank is still struggling to get inflation up to its 2% target and in August inflation was 1.5%. It is therefore unlikely to start on an upswing in rates until possibly 2019.

2.6 Growth in the American economy has been volatile in 2015 and 2016. 2017 is following that path again with quarter 1 coming in at only 1.2% but quarter 2 rebounding to 3.1%, resulting in an overall annualised figure of 2.1% for the first half year. Unemployment in the US has also fallen to the lowest level for many years, reaching 4.4%, while wage inflation pressures, and inflationary pressures in general, have been building. The Fed has started on a gradual upswing in rates with three increases since December 2016; and there could be one more rate rise in 2017 which would then lift the central rate to 1.25 – 1.50%. There could then be another four more increases in 2018. At its June meeting, the Fed strongly hinted that it would soon begin to unwind its \$4.5 trillion balance sheet holdings of bonds and mortgage backed securities by reducing its reinvestment of maturing holdings.

3. Portfolio position 1/4/2017 to 30/9/2017

Movements in the Council's borrowing during the first six months of 2017/18 financial year can be seen in the table below. Long term loans are deemed to be those repayable over a period of more than one year.

Source of Loan	Balance at 1 April 2017 £	Raised during Apr-Sept £	Repaid during Apr-Sept £	Balance at 30 Sept 2017 £
Temporary Borrowing				
Local Authority	0	6,000,000	6,000,000	0
Temporary Investment	21,000	0	0	21,000
Total Short Term Borrowing	21,000	6,000,000	6,000,000	21,000
Long Term Borrowing				
- Public Works Loan Board	48,929,794	0	270,123	48,659,671
- Market Loans	15,900,000	0	0	15,900,000
Long Term Borrowing	64,829,794	0	270,123	64,559,671
Total External Borrowing	64,850,794	6,000,000	6,270,123	64,580,671

- 3.1** In February 2017 the Council's borrowing costs for 2017/18 was budgeted to be £2,477,900 and this is expected to come in at £2,494,060, an overspend of £16,160. The small increase estimated is in respect of what the General Fund needs to pay the HRA for the reserves and balances held within the council investment balances. These balances are expected to come in higher than what was estimated in February 2017 due mainly to the higher rate of return on investments which ultimately affects the interest paid on the HRA balances.
- 3.2** The Public Works Loan Board (PWLB) remains an attractive source of borrowing for the Council as it offers flexibility and control. No long term borrowing has occurred as of yet, however some borrowing is expected to take place before the 31st March 2018 in respect of the new Crematorium. Further analysis is required to decide on what is to be funded from the PWLB and the level of internal resources that is required. Members will be updated as soon as any new borrowing is untaken.
- 3.3** Debt rescheduling opportunities have been very limited in the current economic climate given the consequent structure of interest rates, and following the increase in the margin added to gilt yields which has impacted PWLB new borrowing rates since October 2010. No debt rescheduling has therefore been undertaken to date in the current financial year.

4. Investments

The DCLG's Guidance on Local Government Investments in England gives priority to security and liquidity and the Council's aim is to achieve a yield commensurate with these principles.

Security of capital remained the Council's main investment objective. This was maintained by following the Council's counterparty policy as set out in its Treasury Management Strategy for 2017/18 approved by Council on the 10th February 2017. This restricted new investment to the following:-

Investment	Max Sum per institution/group	Maximum period
Debt Management Agency Deposit Facility* (DMADF) <ul style="list-style-type: none"> 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

Investment	Max Sum per institution/group	Maximum period
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
Repo/reverse repo – fixed term deposits with banks and other financial institutions	£7m	1 year
Property Funds	Unspecified	Unlimited
Equities – One off for an App investment	£50k	Unlimited
Other Money Market and Collective Investment Schemes	£2m	Unlimited
Certificates of deposit (CD's) issued by banks and building societies covered by UK Government (explicit) guarantee	£7m	2 years

This Council applies the creditworthiness service provided by Capita. 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.

4.1 It is a very difficult investment market in terms of earning the level of interest rates commonly seen in previous decades as rates are very low and in line with the 0.25% Bank Rate. The continuing potential for a re-emergence of a Eurozone sovereign debt crisis together with other risks which could impact on the creditworthiness of banks prompts a low risk strategy. Given this risk environment, investment returns are likely to remain low.

4.2 Investments - Movements in the Council's investment portfolio during the first six months of 2017/18 can be seen in the table below.

Source of Loan	Balance at 1 April 2017 £	Raised during Apr-Sept £	Repaid during Apr-Sept £	Balance at 30 Sept 2017 £
Short term Lending				
Bank – Term Deposits/CD'S	18,000,000	13,000,000	14,000,000	17,000,000
Local Authorities	1,000,000	0	0	1,000,000
Call A/C's	300,000	49,710,000	47,440,000	2,570,000
Glos Airport (Temp)	70,000	0	35,000	35,000
Glos Airport (Revolving Credit)	0	200,000	0	200,000
Money Market Funds	0	22,200,000	18,200,000	4,000,000
CCLA Property Fund	0	1,000,000	0	1,000,000
St. Margaret's Hall	0	50,000	0	50,000
Total Lending	19,370,000	86,160,000	79,675,000	25,855,000
Icelandic Banks in administration	Balance at 1 April 2017 £	Raised during Apr-Sept £	Repaid during the year £	Balance at 30 Sept 2016 £
- Kaupthing Singer & Friedlander	484,986	0	27,646	457,340
Total Icelandic Banks	484,986	0	27,646	457,340
Total External Investments	19,854,986	86,160,000	79,702,646	26,312,340

4.3 In February 2017 the Council's Investment income for 2017/18 was budgeted to be £385,700 which includes £290,600 from the interest payable in respect of the third party loans from CBH, Cheltenham Everyman Theatre and Glos. Airport Ltd. The average cash balances representing the council's reserves and working balances, was £23.440m during the period this report covers. The Council anticipates an investment outturn of £140,600 at a rate of return of 0.60% for this financial year plus the £290,600 from the third party loans. In total we are expecting a surplus of around £45,500 for the financial year. This has been maintained by following the Council's counterparty policy as set out in its Treasury Management Strategy Statement for 2017/18.

4.4 Included within the investments of £26.312m as at 30th September 2017, the Council has £457k deposited in the collapsed Icelandic bank Kaupthing Singer & Friedlander (KSF). KSF administrators have made distributions of 85.15p in the pound to date. Administrators currently estimate a total return of 86.25p-87p in the pound, which is a small improvement from when last reported. The next dividend is due in December 2017.

5. Prudential Indicators

5.1 During the financial year to date the Council has operated within the treasury limits and Prudential Indicators set out in the Council's Treasury Policy Statement and Annual Treasury Strategy Statement. Appendix 1 attached highlights the major indicators.

6. Outlook

	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%	0.50%	0.50%	0.75%	0.75%
5yr PWLB rate	1.50%	1.60%	1.70%	1.70%	1.80%	1.80%	1.90%	1.90%	2.00%	2.00%
10yr PWLB rate	2.20%	2.30%	2.30%	2.40%	2.40%	2.50%	2.50%	2.60%	2.60%	2.70%
25yr PWLB rate	2.90%	2.90%	3.00%	3.00%	3.10%	3.10%	3.20%	3.20%	3.30%	3.30%
50yr PWLB rate	2.70%	2.70%	2.80%	2.80%	2.90%	2.90%	3.00%	3.00%	3.10%	3.10%

6.1 Capita Asset Services undertook its last review of interest rate forecasts on 9 August after the quarterly Bank of England Inflation Report. There was no change in MPC policy at that meeting. However, the MPC meeting of 14 September revealed a sharp change in sentiment whereby a majority of MPC members said they would be voting for an increase in Bank Rate "over the coming months". It is therefore possible that there will be an increase to 0.5% at the November MPC meeting. If that happens, the question will then be as to whether the MPC will stop at just withdrawing the emergency Bank Rate cut of 0.25% in August 2016, after the result of the EU withdrawal referendum, or whether they will embark on a series of further increases in Bank Rate during 2018.

The overall balance of risks to economic recovery in the UK is currently to the downside but huge variables over the coming few years include just what final form Brexit will take, when finally agreed with the EU, and when.

Downside risks to current forecasts for UK gilt yields and PWLB rates currently include:

- 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.
- Geopolitical risks in Europe, the Middle East and Asia, which could lead to increasing safe haven flows.
- A resurgence of the Eurozone sovereign debt crisis.
- Weak capitalisation of some European banks.
- Monetary policy action failing to stimulate sustainable growth and to get inflation up consistently to around monetary policy target levels.
- UK inflation returning to significantly higher levels causing an increase in the inflation premium inherent to gilt yields

7. Performance management

- 7.1** In compliance with the requirements of the Treasury Management CIPFA Code of Practice this report provides members with a summary report of the treasury management activity during the first six months of 2017/18. None of the Prudential Indicators have been breached and a prudent approach has been taken in relation to investment activity with priority being given to security and liquidity over yield.

8. Other

8.1 Revised CIPFA Codes

Chartered Institute of Public Finance and Accountancy, (CIPFA), is currently conducting an exercise to consult local authorities on revising the Treasury Management Code and Cross Sectoral Guidance Notes, and the Prudential Code. CIPFA is aiming to issue the revised codes during November. A particular focus of this exercise is how to deal with local authority investments which are not treasury type investments e.g. by investing in purchasing property in order to generate income for the authority at a much higher level than can be attained by treasury investments. One recommendation is that local authorities should produce a new report to members to give a high level summary of the overall capital strategy and to enable members to see how the cash resources of the authority have been apportioned between treasury and non treasury investments. Officers are monitoring developments and will report to members when the new codes have been agreed and issued and on the likely impact on this authority.

8.2 MIFID II

The EU has now set a deadline of 3 January 2018 for the introduction of regulations under MIFID II. These regulations will govern the relationship that financial institutions conducting lending and borrowing transactions will have with local authorities from that date. This will have little effect on this authority apart from having to fill in forms sent by each institution dealing with this authority and for each type of investment instrument we use apart from for cash deposits with banks and building societies. This council will be opting up for 'professional' status where necessary.

Report author	Contact officer: Andrew Sherbourne, andrew.sherbourne@cheltenham.gov.uk 01242 264337
Appendices	Prudential Indicators Appendix 1 Risk Appendix 2
Background information	Treasury Management Strategy, Council 10th February 2017

1. The Council's Capital Position (Prudential Indicators)

This part of the report is structured to update:

- The Council's capital expenditure plans;
- How these plans are being financed;
- The impact of the changes in the capital expenditure plans on the prudential indicators and the underlying need to borrow; and
- Compliance with the limits in place for borrowing activity.

1.1 Prudential Indicator for Capital Expenditure

This table shows the revised estimates for capital expenditure and the changes since the capital programme was agreed at the Budget.

Capital Expenditure by Service	2017/18 Original Estimate £m	2017/18 Current Position £m	2017/18 Revised Estimate £m
General Fund	22,908	1,718	25,798
HRA	10,892	2,898	10,678
Total capital expenditure	33,800	4,616	36,476

1.2 Changes to the Financing of the Capital Programme

The table below draws together the main strategy elements of the capital expenditure plans (above), highlighting the original supported and unsupported elements of the capital programme, and the expected financing arrangements of this capital expenditure. The borrowing element of the table increases the underlying indebtedness of the Council by way of the Capital Financing Requirement (CFR), although this will be reduced in part by revenue charges for the repayment of debt (the Minimum Revenue Provision). This direct borrowing need may also be supplemented by maturing debt and other treasury requirements.

Capital Expenditure	2017/18 Original Estimate £000	2017/18 Revised Estimate £000
Total capital expenditure		
Financed by:		
Capital receipts	6,725	8,072
Capital grants	734	932
Capital reserves	6,169	6,170
3 rd Party Contributions	960	248
Revenue	2,831	3,348
Borrowing requirement	16,381	17,706

1.3

Changes to the Prudential Indicators for the Capital Financing Requirement (CFR), External Debt and the Operational Boundary

The table below shows the CFR, which is the underlying external need to incur borrowing for a capital purpose. It also shows the expected debt position over the period, which is termed the Operational Boundary.

Prudential Indicator – Capital Financing Requirement

We are on target to achieve the original forecast Capital Financing Requirement (*or explain any significant changes*).

Prudential Indicator – the Operational Boundary for external debt

	2017/18 Original Estimate £000	2017/18 Current Position £000	2017/18 Revised Estimate £000
Prudential Indicator – Capital Financing Requirement			
Total CFR	99,098	99,098	99,098
Prudential Indicator – the Operational Boundary for external debt			
Borrowing	112,000	64,581	112,000
Other long term liabilities*	0	0	0
Total debt (year- end position)	112,000	64,581	112,000

The Director of Finance reports that no difficulties are envisaged for the current or future years in complying with this prudential indicator.

A further prudential indicator controls the overall level of borrowing. This is the Authorised Limit which represents the limit beyond which borrowing is prohibited, and needs to be set and revised by Members. It reflects the level of borrowing which, while not desired, could be afforded in the short term, but is not sustainable in the longer term. It is the expected maximum borrowing need with some headroom for unexpected movements. This is the statutory limit determined under section 3 (1) of the Local Government Act 2003.

Authorised limit for external debt	2017/18 Original Indicator £000	2017/18 Current Position £000	2017/18 Revised Indicator £000
Borrowing	122,000	122,000	122,000

1.4 Limits to Borrowing Activity

The first key control over the treasury activity is a prudential indicator to ensure that over the medium term, net borrowing (borrowings less investments) will only be for a capital purpose*. Gross external borrowing should not, except in the short term, exceed the total of CFR in the preceding year plus the estimates of any additional CFR for 2017/18 and next two financial years. This allows some flexibility for limited early borrowing for future years. The Council has approved a policy for borrowing in advance of need which will be adhered to if this proves prudent.

	2017/18 Original Estimate £000	2017/18 Current Position £000	2017/18 Revised Estimate £000
Borrowing (Total Debt)	79,686	64,581	79,686
CFR* (year-end position)	99,098	99,098	99,098

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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 - If £7m of these loans is recalled by the banks if they choose to exercise their option then we would need to have the resources on the day to repay. Alternative borrowing arrangements at today's current rates would be favourable for the Council	Section 151 Officer Paul Jones	24 th January 2012	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.	March 2018	Section 151 Officer Paul Jones	

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Cheltenham Borough Council Council – 11 December 2017 Local Council Tax support Scheme for 2018/19

Accountable member	Councillor Rowena Hay, Cabinet Member Finance
Accountable officer	Jayne Gilpin, Head of Revenues and Benefits
Ward(s) affected	All
Key/Significant Decision	Yes
Executive summary	<p>The Council is required to approve its working age local council tax support scheme for the forthcoming financial year by 31st January each year. The scheme being proposed for 2018/19 remains unchanged from 2017/18.</p> <p>The scheme for pension age customers is set by Government scheme and administered by the council.</p>
Recommendations	<p>That Council :</p> <ol style="list-style-type: none"> 1. Approves the council tax support scheme for working age customers for 2018/19, other than any annual uprating of premiums, allowances and non-dependant deductions.

Financial implications	<p>In 2013/14, the year council tax support was introduced, the council received £811,659 within its grant funding from central government which represented 90% of the estimated cost of council tax support</p> <p>In 2014/15 the government stopped separately identifying the contribution it makes to both the working and pension age schemes, leaving it entirely up to the local councils to decide how much they are prepared to spend on council tax support. From 2019/20 the council will no longer receive revenue support grant which means that we will be fully funding the scheme from council tax and business rates revenue</p> <p>Given the overall funding position the council will need to review the council tax support scheme from 2019/20</p> <p>Contact officer: Paul Jones paul.jones@cheltenham.gov.uk, 01242 775154</p>
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Legal implications	<p>The Welfare Reform Act 2012 abolished Council Tax Benefit and instead required each authority to design a scheme specifying the reductions which are to apply to amounts of Council tax. The prescribed regulations set out the matters that must be included in such a scheme.</p> <p>The Local Government Tax Support 'LCTS' scheme is required under Section 13A of the Local Government Finance Act 1992 (updated in 2012). The Act states that for each financial year, councils must consider whether to revise their LCTS scheme or replace it with another scheme and that such decisions need to be made by 31 January in the financial year preceding that for which the revision or replacement scheme is to take effect. If the Council does not make/revise a LCTS scheme by 31 January 2018, a default scheme will be imposed on the Council which will be effective from April 2018.</p> <p>Contact officer: Peter Lewis, peter.lewis@teWKesbury.gov.uk, 01684 272012</p>
HR implications (including learning and organisational development)	<p>No direct HR implications arising from the content of the report</p> <p>Contact officer: Julie McCarthy, julie.mccarthy@cheltenham.gov.uk, 01242 264355</p>
Key risks	See appendix 1
Corporate and community plan Implications	None
Environmental and climate change implications	None
Property/Asset Implications	<p>There are no implications with regard to the council's property assets.</p> <p>Contact officer: David Roberts@cheltenham.gov.uk</p>

1. Background

- 1.1** Since 2013 the Council has been required to establish a Local Council Tax Support Scheme to help people on a low income to pay their council tax. This scheme replaced the national Council Tax Benefit Scheme.
- 1.2** The Council is also required to administer the national council tax support scheme for pension age customer.
- 1.3** Funding for the local council tax support scheme in 2013/14 was cut by 10% compared to funding for the previous benefit scheme. The contribution from Government towards the scheme is no longer separately identified so the design of local council tax support schemes will dictate how much funding is allocated. Some councils have chosen to reduce the amount of council tax support paid to reduce expenditure.
- 1.4** The local council tax support scheme since 2013/14 in Cheltenham has continued to mirror the previous council tax benefit scheme which has ensured the most vulnerable customers have not been impacted upon. The council has so far absorbed any shortfall in funding, assisted by utilising our local powers to reduce the council tax discounts on empty properties.
- 1.5** Since 2013, the number of people claiming council tax support has continued to reduce. The caseload and amount of council tax support paid for October 2013 and October 2017 are shown below

Working Age	Caseload	Council Tax Support
2013	4,703	£3.91m
2017	4,117	£3.56m

Pension Age	Caseload	Council Tax Support
2013	3,071	£2.63m
2017	2,534	£2.26m

- 1.6** The council tax support scheme is means tested, so the more income the person has the less support they receive.

2. Reasons for recommendations

- 2.1** The council is required to make or revise its local council tax support scheme for the forthcoming financial year by 31 January 2018.
- 2.2** A number of welfare reforms targeted at working age people have been implemented since 2013 and Universal Credit is now being rolled out in Cheltenham. Maintaining the level of council tax support will ensure our vulnerable residents are not impacted further. It is affordable to continue with the council tax support scheme for a further year.
- 2.3** Members are therefore being asked to approve a scheme for 2018/19 which remains unchanged for a further year, other than applying any uprating of premiums, allowances or non-dependant deductions.

3. Alternative options considered

- 3.1 Due to the reasons detailed in section 2 above making changes to the scheme is not being considered for 2018/19.
- 3.2 The wider introduction of Universal Credit will impact on how council tax support is administered. It may be necessary to consider an alternative scheme for future years. During 2018/19 some modelling will be carried out and a consultation will be carried out on any proposals to change the scheme.

4. Consultation and feedback

- 4.1 A period of consultation ran from 1st to 30th November 2017 on the council’s website. The main voluntary agencies in Cheltenham were also contacted for their opinions as they are dealing with customers affected by all the welfare benefit cuts on a day to day basis.
- 4.2 The finance officers from the County Council and the Police and Crime Commissioner’s office were also contacted as the main preceptors for their comments.
- 4.3 One response was received to the consultation on the Council’s website which stated
“I can understand the provision of some flexibility in council tax payment especially to families with children, however this should not become a way of life, surely to be fair to all taxpayers this should be time limited and preferably treated as a loan.”

5. Performance management –monitoring and review

- 5.1 The caseload will be monitored and any increase/decrease of council tax support and any significant changes will be reported to cabinet.

Report author	Contact officer: Jayne Gilpin, Head of Revenues and Benefits Jayne.gilpin@cheltenham.gov.uk, 01242 264323
Appendices	1. Risk Assessment

Background information	<ol style="list-style-type: none">1. Proposed working age Council tax support scheme for 2018/192. The Local Government Finance Act 1992, amended by the Local Government Finance Act 2012 http://www.legislation.gov.uk/ukpga/2012/17/contents3. The Council Tax Reduction Schemes (Prescribed Requirements) (England) Regulations 2012 http://www.legislation.gov.uk/uksi/2012/2885/contents/made4. The Council Tax Reduction Schemes (Prescribed Requirements and Default Scheme) (England) (Amendment) Regulations 2012 http://www.legislation.gov.uk/uksi/2012/2885/contents/made
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The risk				Original risk score (impact x likelihood)			Managing risk				
Risk ref.	Risk description	Risk Owner	Date raised	Impact 1-5	Likelihood 1-6	Score	Control	Action	Deadline	Responsible officer	Transferred to risk register
1	If a working age council tax support scheme is not approved it will not meet the legal requirements to have a scheme in place by 31 st January 2018.	Jayne Gilpin		3	2	6	Accept		11/12/2017	Jayne Gilpin	
2	Financial risk if take up of council tax support significantly increases as a result of any increase in council tax	Paul Jones		3	3	9	Accept	Ongoing monitoring throughout the year as part of internal controls		Jayne Gilpin	
<p>Explanatory notes</p> <p>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)</p> <p>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)</p> <p>Control - Either: Reduce / Accept / Transfer to 3rd party / Close</p>											

**Cheltenham Borough Council
Cabinet 05 December 2017
Council 11 December 2017
Council Tax Premium on Empty Properties**

Accountable member	Councillor Rowena Hay
Accountable officer	Jayne Gilpin, Head of Revenues and Benefits
Ward(s) affected	All
Key/Significant Decision	Yes
Executive summary	This report proposes the introduction of a council tax premium of 50% from 1st April 2018. It will apply to long term empty properties which have been unoccupied and unfurnished for more than 2 years
Recommendations	Cabinet recommends that Council Determines that the Council Tax Empty Homes Premium of 50% is implemented from 1st April 2018 in respect of properties which have been unoccupied and unfurnished for more than 2 years.

Financial implications	<p>Point 2.6 shows the potential additional council tax that could be raised as a result of the proposals in this report.</p> <p>However, it should be noted that the actual council tax collected may be lower than the figures stated as owners of empty properties may bring them back in to use more quickly.</p> <p>These changes will also impact on the Housing Revenue Account as they will apply to council owned empty properties managed by Cheltenham Borough Homes.</p> <p>Contact officer: Paul Jones, Chief Finance Officer, paul.jones@cheltenham.gov.uk, 01242 775154</p>
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<p>Legal implications</p>	<p>The Local Government Finance Act 2012 inserted Councils are permitted to charge the 50% premium for long term empty homes by virtue of Section 11b Local Government Finance Act 1992 (as amended). Section 67(2) of that Act provides that the power to decide to introduce a premium can only be exercised by full Council.</p> <p>Contact officer: peter.lewis@tewkesbury.gov.uk, 01684 272012</p>
<p>HR implications (including learning and organisational development)</p>	<p>None</p> <p>Contact officer: , @cheltenham.gov.uk, 01242</p>
<p>Key risks</p>	<p>See Appendix 1</p>
<p>Corporate and community plan Implications</p>	
<p>Environmental and climate change implications</p>	
<p>Property/Asset Implications</p>	<p>These changes will apply to any council owned empty properties</p> <p>Contact officer: David Roberts@cheltenham.gov.uk</p>

1. Background

- 1.1** The Local Government Finance Acts of 2003 and 2012 introduced some amendments to the Local Government Finance Act 1992, giving discretionary powers for councils to set the level of council tax discount on empty properties.
- 1.2** This council has already used its discretionary powers to set discount levels in respect of empty properties and second homes which are detailed in appendix 2.
- 1.3** For Class C, unoccupied and unfurnished properties a 25% discount is awarded for the first 6 months, followed by the 100% liability once the 6 months has expired.
- 1.4** The 2012 act also inserted the empty homes premium allowing councils to charge an additional 50% council tax in respect of class C properties which have been empty and unfurnished for more than 2 years.
- 1.5** The classification as a Class C property starts when the property becomes empty and unfurnished and this does not change as a result of a change in owner or tenant.
- 1.6** If a property becomes occupied or furnished this must be for a period of at least 6 weeks before it can be treated empty and unfurnished again.
- 1.7** The decisions made so far support the council's strategy to bring empty homes back in to use more quickly and generate additional council tax income.
- 1.8** Approval is now being sought to implement the empty homes premium with effect from 1st April 2018.

2. Reasons for recommendations

- 2.1** The number of properties which have been unoccupied and unfurnished for more than 6 months in Cheltenham as at October 2017 was 388. When discretionary powers to reduce the discount level on empty properties was first introduced in 2004 the number was 567. Empty properties are reviewed regularly by the Revenues and Benefits Section and the Empty Homes Team but the number has remained fairly stable at just under 400 for a number of years and is not reducing. Of the 388 properties 80 have been empty for more than 2 years.
- 2.2** A certain level of empty homes is inevitable and is a feature of a healthy housing market. However properties which have been empty and unfurnished for 2 years or more are often subject to deterioration that can affect the fabric of the property, can cause damage to neighbouring homes and can attract other anti-social problems to the area.
- 2.3** Some properties will be empty because they are difficult to sell or let and may be in need of renovation work. With increased pressure to find housing for people in need the Council wants to encourage homeowners to bring long term empty homes into use to the benefit of all residents. Charging the empty homes premium will send a clear message to owners that it is not acceptable to keep properties empty, often creating a local nuisance and wasting housing resource.
- 2.4** There are a number of enforcement options available to the Council to make owners bring empty homes back into use, for example, Empty Dwelling Management Orders and Compulsory Purchase Orders. Using these enforcement powers will be considered in individual cases, based on the circumstances.
- 2.5** Information published by DCLG in October 2016 shows that 287 out of 326 councils were charging the empty homes premium. In Gloucestershire, only Stroud and Cotswold District councils do so.
- 2.6** Based on the 80 properties and the council tax level for 2017/18 charging the premium would

increase council tax income by approximately £7,300, for this Council £44,000 for Gloucestershire County Council and £8,000 for the Police .

2.7 The Government has prescribed two classes of dwellings which are exempt from the premium. These are:

a dwelling which would otherwise be the sole or main residence of a member of the armed services , who is absent from the property as a result of such service;

a dwelling, which forms part of a single property (an annexe) that is being treated by a resident of that property as part of the main dwelling

Information held indicates that none of the properties due to be subject to the premium fall in to either of these categories

3. Alternative options considered

3.1 The alternative would be to leave the Council Tax level at 100% and not charge the Empty Homes Premium. This does not provide any further incentive for property owners to bring them back in to use

4. Consultation and feedback

4.1 There is no statutory requirement to consult on these proposals. The Empty Homes Team welcome additional measures to support bringing empty properties back in to use.

4.2 There is a legal requirement for the Council to publish any decision using these powers in a local newspaper within 21 days of the decision.

4.3 If Council approves the recommendation the Council Tax team will contact all council tax payers likely to be subject to the premium from April 2018 to advise them of the change. This will be done before the end of January.

5. Performance management –monitoring and review

5.1 The impact of these changes will be monitored closely and reported to members in budget monitoring reports.

Report author	Contact officer: Jayne Gilpin, Jayne.gilpin@cheltenham.gov.uk, 01242 264323
Appendices	1. Risk Assessment 2. Council Tax discounts on empty properties

Background information	<ol style="list-style-type: none">1. The Local Government Finance Act 1992 http://www.legislation.gov.uk/ukpga/1992/14/contents2. The Local Government Act 2003 http://www.legislation.gov.uk/ukpga/2003/26/contents3. The Local Government Finance Act 2012 http://www.legislation.gov.uk/ukpga/2012/17/contents4. The Council Tax (Prescribed Class of Dwellings (England) Regulations 2003 http://www.legislation.gov.uk/uksi/2003/3011/contents/made5. The Council Tax (Prescribed Class of Dwellings (England) Regulations 2012 http://www.legislation.gov.uk/uksi/2012/2964/contents/made6. The Council Tax (Exempt Dwellings) (England) (Amendment) Order 2012 http://www.legislation.gov.uk/uksi/2012/2965/contents/made7. Report to council 15/12/2014 – Council Tax Discounts on Empty Properties https://democracy.cheltenham.gov.uk/documents/s14182/2014_12_09_CAB_Council_Tax_discounts_empty_properties%2009122014%20Cabinet.pdf
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The risk				Original risk score (impact x likelihood)			Managing risk				
Risk ref.	Risk description	Risk Owner	Date raised	Impact 1-5	Likelihood 1-6	Score	Control	Action	Deadline	Responsible officer	Transferred to risk register
	If it becomes difficult to collect the higher council due then the estimated additional income may not be fully realised	Jayne Gilpin	11/12/2017	1	3	3	Accept	Monitor and review		Jayne Gilpin	
	If owners continue to leave properties empty the number of long term empty properties will not reduce	Jayne Gilpin	11/12/2017	2	3	6	Accept	Monitor and consider enforcement action in individual cases		Jayne Gilpin	

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

Council Tax Empty Property Discount Classes

Discount Class	Discount Level up to and including 31 March 2018	Discount Level with effect from 01 April 2018
Class C Empty and unfurnished for up to 6 months *	25% discount	25% for up to 6 months Once the 25% has been awarded for 6 months no further discount will be awarded unless the property is re-occupied for a period of not less than 6 weeks
Class C Empty and unfurnished for more than 6 months, but less than 2 years *	Zero discount – 100% council tax payable	Zero discount – 100% council tax payable
Class C Long Term Empty Properties Empty and unfurnished for more than 2 years*	Zero discount – 100% council tax payable	150% council tax payable
Class D Empty and unfurnished and undergoing major works/structural repairs to render them habitable – for up to 12 months *	25% discount	25% discount for up to 12 months Once the 25% has been awarded for 12 months no further discount will be awarded unless the property is re-occupied for a period of not less than 6 weeks
Second Homes - properties which are furnished but not occupied as anyone's main home	Zero discount – 100% council tax payable	Zero discount – 100% council tax payable

* In respect of class C and D If a property is re-occupied or substantially furnished for a period of less than 6 weeks this will be disregarded for the purposes of determining the date it became empty and unfurnished

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Cheltenham Borough Council Council – 11 December 2017 Community Governance Review

Accountable member	Cllr Steve Jordan, Leader
Accountable officer	Pat Pratley, Chief Executive
Ward(s) affected	Pittville, St Pauls, Oakley, Prestbury, Up Hatherley, Warden Hill, Leckhampton, Park, Charlton Kings, Charlton Park, Battledown
Key/Significant Decision	Yes
Executive summary	<p>Council will recall that a cross party working group – the Community Governance Review Working Group (CGR Working Group) was set up to oversee the community governance review prompted by the receipt of a petition from Pittville Parish Council Campaign Group for the creation of a new parish council. The terms of reference were agreed by Council on 27 March 2017 and subsequently revised by Council at its meeting on 24 July 2017.</p> <p>At the July meeting, Council agreed a process for consulting a number of electors across Cheltenham to support the community governance review into the creation of a new parish council for Pittville and to consider alterations to boundaries of three parish councils; Charlton Kings, Leckhampton with Warden Hill and Up Hatherley, plus consultation on the anomaly areas in Merestones Drive and St Nicholas Drive.</p> <p>This report summarises the results of the consultation and brings forward recommendations from the CGR Working Group about how the council should proceed with the next phase of the review – the development of and agreement to a Reorganisation Order.</p> <p>Since the end of the consultation period, the CGR Working Group has met twice to:</p> <ul style="list-style-type: none"> • Review the results from the consultation; • Liaise with the parish councils who have proposed the changes; • Liaise with ward councillors that represent residents that might be affected by the proposed changes; • Liaise with the Elections and Registration Manager about the proposed parish warding, polling districts and allocation of parish councillors; • Develop its recommendations regarding the proposals to the proposed alterations, warding, polling districts and representation. <p>The CGR Working Group now seeks Council approval to the recommendations below. With regard to parish council boundary alterations, Council is being asked to support the changes as set out and to agree that notification of these proposed changes be given to those who were consulted. The formal Reorganisation Order will be referred to Council for approval in January 2018.</p>

	<p>In addition, it is brought to Council's attention that a further request was received from Leckhampton with Warden Hill Parish Council to include an additional area of Leckhampton Hill within the enlarged parish. Council is being recommended to agree to carry out a further piece of consultation to inform the development of the Reorganisation Order.</p>
<p>Recommendations</p>	<ol style="list-style-type: none"> 1. That the creation of a parish council for Pittville not be supported 2. That the alteration of parish council boundaries be supported as follows: <ol style="list-style-type: none"> a. The boundary of Charlton Kings Parish Council be altered to include the additional four areas as shown in appendix 3. b. That the boundary of Up Hatherley Parish Council be altered to include an additional area as shown in appendix 4 which is an area wholly within Warden Hill Ward c. That the boundary of Leckhampton with Warden Hill Parish Council be altered to include the additional area as shown in appendix 5. d. That the boundary of Prestbury Parish council be altered to include the area of St Nicholas Drive as shown in appendix 6 3. That the removal of the Merestones Drive properties from Leckhampton with Warden Hill Parish Council is not supported following the results of the consultation. 4. That additional consultation is undertaken regarding the request to further extend the boundary of Leckhampton with Warden Hill Parish Council to include the area as set out in section 10 and as shown in appendix 7 and that the Chief Executive be requested to make and publicise recommendation(s) to Council upon the results of that consultation. 5. That the parish warding, polling districts and representation for the additional parished areas be supported as follows: <ol style="list-style-type: none"> a. For the four additional areas of Charlton Kings Parish Council as detailed in para 4.11; b. For the additional area of Up Hatherley Parish Council as detailed in 6.12; c. For the additional area of Leckhampton with Warden Hill Parish Council as detailed in para 8.14; d. For the additional area of Prestbury Parish Council as detailed in para 11.6 and 11.7. 6. That the Chief Executive, in consultation with the Borough Solicitor and Leader of the Council, be authorised to prepare the Reorganisation Order and that the Order be brought back to Council on January 2018 for approval.

	<p>7. That householders residing in the properties originally written to are informed of the outcome of the consultation and the intentions of Council as set out in the above recommendations.</p> <p>8. That the Chief Executive be authorised to take such actions and decisions as are necessary to move forward and facilitate the recommendations and matters set out in this report, including consultation, if she so decides, with the CGR Working Group (which shall remain constituted with the current terms of reference and membership)</p>
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<p>Financial implications</p>	<p>The estimated cost printing and distributing letters to all the householders in line with recommendation 4 is approximately £3,000.</p> <p>This sum will have to be met from the council's general balances.</p> <p>Charlton Kings, Up Hatherley and Leckhampton with Warden Hill Parish Councils will need to include in their precepts for 2018/19 the estimated additional costs of setting up, and providing services to, their respective additional areas.</p> <p>The Tax Base for each parish, calculated in December 2017, will also need to include the additional areas.</p> <p>The estimated cost of adopting the additional areas to each Parish Council and the effect on their precepts and council taxes will also need to be identified in the Reorganisation Order, which must be approved before the Tax Bases are finalised by 31 January and before the Council Tax can be set for the affected parishes in February 2018.</p> <p>Contact officer Martyn Scull Martyn.Scull@Cheltenham.gov.uk Tel 01242 264351</p>
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Legal implications	<p>As indicated in the report, the Act dealing with Community Governance Reviews is the Local Government and Public Involvement in Health Act 2007 Part 4, Chapter 3. This Act lays down the procedure to be used and the various factors that must be taken into account.</p> <p>The duty under Section 93 of the Act is to consult the electors of the area under review, and other person/bodies with an interest in the review, and to try and secure a community that reflects the identities and interests of the community affected, as well as needing to make the area "effective and convenient". The council must also take into account arrangements for community representation and community engagement, as well as having regard to any representations made. Any recommendations must, under the Act, be published and any persons who may be interested in the review informed of the recommendations.</p> <p>With regard to the issues concerning Leckhampton rehearsed in section 8 of the report, it is permissible to look at the entirety of the area proposed to be added to the Leckhampton and Warden Hill Parish Council area. The council must be happy that the boundaries reflect the community and will be effective and convenient. Indeed the council may be of the view to remove an element of the proposed area out of the proposed extension may work against these principles especially as the area as a whole voted in favour of the extension.</p> <p>A draft form of Reorganisation Order is provided by the Government on their Communities and Local Government website for assisting Councils and is drafted to help cover most eventualities from the creation of a parish, to reorganisations of their boundaries, including wards and property transfers. The first draft of the Order(s) will be produced if Council accepts the recommendations of this report and will be included in the report to a future meeting of Council to enable that meeting to approve the actual Order(s).</p> <p>Contact officer Gary Spencer gary.spencer@teWKesbury.gov.uk 01684 272012</p>
HR implications (including learning and organisational development)	<p>None identified as a result of these recommendations</p> <p>Contact officer Julie McCarthy Julie.mccarthy@cheltenham.gov.uk 01242 264355</p>
Key risks	<p>Please see risk assessment attached as appendix 1</p>
Corporate and community plan Implications	<p>Supporting the creation and growth of parish councils in the borough supports the Corporate Strategy theme 'People live in strong, safe and healthy communities', as people are encouraged to get actively involved in their communities.</p>
Environmental and climate change implications	<p>Neutral impact on climate change.</p>

Property/Asset Implications	None identified as a result of these recommendations Contact officer David Roberts David.Roberts@cheltenham.gov.uk Tel: 01242 264151
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1. Background

- 1.1 A campaign group in Pittville submitted a valid petition to Cheltenham Borough Council in January 2017, calling for the creation of a new parish council for Pittville. This meant that CBC was required under the Local Government and Public Involvement in Health Act 2007 to carry out a community governance review to decide whether or not a new parish council should be created.
- 1.2 Council on 27 March 2017 agreed the terms of reference for the working group which considered the proposals from the Pittville Parish Council Campaign Group and proposals to consider two small anomaly areas in Merestones Drive and St. Nicholas Drive. Council also invited proposals from three of the existing parish councils about consulting on extensions to their current boundaries as part of this review.
- 1.3 The consultation plans were agreed by Council on 24 July and over the summer nearly 9,400 electors were written to asking them whether they were in favour of their area becoming part of a parish council.
- 1.4 The closing date for responses was 8th October.

2. Consultation results and the CGR Working Group's initial response

- 2.1 The council received just over 3,000 responses to the consultation as shown in the table below with full details attached as **appendix 2**.

Area	Paper	Online	Total	Total issued	% return
Charlton Kings	367	84	451	1144	39.42
Leckhampton	655	131	786	3114	25.24
Pittville	1123	277	1400	3696	37.88
Up Hatherley	360	77	437	1421	30.75
Anomalies	10	0	10	21	47.62
Total	2515	569	3084	9396	32.82

- 2.2 The CGR Working Group were very pleased with the response which demonstrated good engagement with the community governance review.
- 2.3 At its meetings on 13 October and 21 November, the working group considered the responses and formulated its recommendations. These are in turn.

3. Proposed Parish Council for Pittville.

- 3.1 The CGR Working Group noted that, on a turn-out of nearly 38%, almost 60% of respondents had voted against the proposed parish council. The Working Group's recommendation is as follows:

That the creation of a parish council for Pittville not be supported.

4. Charlton Kings – four additional areas.

- 4.1 The CGR Working Group noted that on an overall turn-out of just over 39%, respondents in each of the four areas had voted in favour of their area being parished. The Working Group also noted the following response from Charlton Kings Parish Council:
- 4.2 *“Our Members were delighted both with the turnout and the conclusive results. These were clear evidence of overwhelming support in all four areas for joining the parish of Charlton Kings and demonstrate that there is an appetite for localism amongst our unparished neighbours. The Parish Council believes that there is now a clear mandate for implementing the boundary changes and Members presume that implementation will now follow as a matter of course, especially in view of the fact that, as stated in the report to Council on 24th July 2017, the growth of parish councils supports Cheltenham Borough Council’s Corporate Strategy”* Liz Dowie, Clerk & RFO to the Parish Council.
- 4.3 **In terms of boundaries, the Working Group’s recommendation is therefore as follows:**
- 4.4 **That the boundary of Charlton Kings Parish Council be altered to include the additional four areas as shown in Appendix 3.**
- 4.5 The CGR Working Group went on to consider the implications for parish warding, polling districts and representation for these additional parished areas
- 4.6 **Area 1** comprises of part of polling district EB and part of polling district ED (both Charlton Park Borough Ward). The electors in EB currently vote at Leckhampton Baptist Hall in Pilley Lane. However, the working group is proposing that this area is merged with the electors in EC to vote at Sacred Hearts Parish Hall in Moorend Road. This area would then be added to the West ward.
- 4.7 **Area 2** comprises of part of polling district ED. These electors already vote at Sacred Hearts Parish Hall where polling station EC currently vote (West Ward of the parish). This could then be added to the West ward. The working group is proposing that this area is merged into polling district EC.
- 4.8 If Areas 1 and 2 are added to the West Ward of the parish an additional two councillors would be required if the ratio of electors to councillors were to remain the same.
- 4.9 **Areas 3 and 4** comprise of part of polling district BA – these would be added to the North ward of the parish and added to polling district BB. An additional councillor should not be required. These electors would have to vote at Holy Apostles Church Hall, London Road instead of Holy Apostles Primary School, Battledown Approach.
- 4.10 The working group is aware that this does leave small residual parts of polling districts EB and ED that are not parished. From the advice of the Elections and Registration Manager, these polling districts will have to remain as they are until the next review of polling districts and stations.
- 4.11 **In terms of parish warding, polling districts and representation, the CGR Working Group’s recommendations are therefore as follows:**
- **Area 1; The parished part of EB and ED are merged with EC and vote at Sacred Hearts;**
 - **Area 2; This area joins EC and votes at Sacred Hearts;**
 - **Areas 1 and 2 are part of the West ward of the parish council;**
 - **West ward will be represented by two additional councillors;**
 - **Area 3 and 4 are added to the North Ward of the parish council;**
 - **Area 3 and 4 are added to polling district BB;**

- **There is a change of polling station for electors in areas 3 and 4, from Holy Apostles Primary School to Holy Apostles Church Hall;**
- **There is no requirement for an additional parish councillor to serve areas 3 and 4.**

5. Charlton Kings proposals - consultation and feedback

- 5.1** The parish council and ward councillors from Battledown, Charlton Kings and Charlton Park were invited to comment on the working group's proposals. The parish council were supportive of the recommendations. Responses were received from Cllr. Baker and Mrs McCloskey. Cllr. Baker felt that the proposals were logical, Cllr. Mrs McCloskey noted that residents in Areas 3 and 4 will have to travel a considerable distance to vote, virtually passing their previous polling station. She observed that this may put them off voting, particularly in local elections, and thus harm the democratic process.

6. Up Hatherley – additional area.

- 6.1** The CGR Working Group noted that whilst there was strong support from respondents in area 1 to be parished (66%), the majority of respondents in area 2 (53%) had indicated that they did not want their area to be parished. The Working Group also noted the following response from Up Hatherley Parish Council

“The results of this poll are almost exactly what we'd hoped for. A two-thirds majority being expressed in the area we have long maintained felt a strong affiliation for Up Hatherley. The equivocal result from the second area is also in many ways helpful as it specifically defines that area that does have these close historic ties. My hope now would be that the working group notes the results and recommends that the Full Council approves proceeding with the process in Up Hatherley area 1 but not in area 2. I am happy to call a special meeting of UHPC if you need that view ratified more formally but I have no doubt given discussions that we have already had within UHPC that this is exactly how we would wish to proceed.” Adrian Bamford Chairman Up Hatherley Parish Council

- 6.2** At its meeting on 21 November, the Working Group went onto consider the implications for parish warding, polling districts and representation for these additional parished areas.
- 6.3** The working group noted that area 1 is currently split across borough wards with the majority being in Warden Hill ward which is within polling district TA and a smaller area along Hatherley Road in Park Ward which is within polling district KA.
- 6.4** The DCLG guidance states that the principal council would need to consider parish warding in circumstances where the parish is divided by district ward boundaries. This would mean that the area in Park Ward (Hatherley Road with 123 electors on 1 July) would have to be a separate parish ward with one councillor.
- 6.5** The Elections and Registration Manager has advised that Council need to be mindful of the need to ensure balanced representation in this area and highlighted DCLG guidance on community governance review which states that:

“If a principal council decides that a parish should be warded, it should give consideration to the levels of representation between each ward. That is to say, the number of councillors to be elected from each ward and the number of electors they represent.

It is an important democratic principle that each person's vote should be of equal weight so far as possible, having regard to other legitimate competing factors, when it comes to the election of councillors. There is no provision in legislation that each parish councillor should represent, as nearly as may be, the same number of electors. However, the Boundary Commission believes it is not in the interests of effective and convenient local government, either for voters or councillors, to have significant differences in levels of representation between different parish wards. Such variations could make it difficult, in workload terms, for councillors to adequately represent the interests of residents. There is also a risk that where one or more wards of a parish are over-represented by councillors, the residents of those wards (and their councillors) could be perceived as having more influence than others on the council"

- 6.6** These 123 electors currently vote at St Stephens Parish Church as part of polling district KA which has a large electorate. Should the area become parished there would have to be a separate register for these electors as they would need to be offered both Borough and Parish ballot papers. The Elections and Registration Manager felt that this could cause confusion in the polling station (due to large electorate).
- 6.7** Given the concerns over the polling district arrangements, coupled with the concerns about disproportionate representation, the Working Group that met on 21 November, agreed to put forward a recommendation to only include the area wholly within Warden Hill ward and to exclude the area within Park ward.
- 6.8** However, Council need to be aware that on subsequent checking of the returns from the Hatherley Road (in Park Ward) showed that 78% of those who voted (of a 47% response rate) were in favour and 22% against. There is therefore a strong sense among local residents that they do wish to be included within Up Hatherley Parish Council.
- 6.9** In addition, the Chairman of Up Hatherley Parish Council has expressed his disappointment with the possibility of this area being excluded from Up Hatherley Parish Council. He feels that parish boundaries should reflect community boundaries and not been restricted by ward boundaries which he feels are more administrative.
- 6.10** **Council are therefore asked to consider the recommendation at 6.12 in light of the strong community support for being parished.**
- 6.11** The Working Group have considered warding and representation for the remaining area (within Warden Hill ward) and are suggesting that this area be a new parish ward known as North Ward, and that it is represented by two parish councillors (to represent 720 electors).
- 6.12** **The Working Group's recommendations are therefore as follows:**
- **That the boundary of Up Hatherley Parish Council be altered to include an additional area as shown in appendix 4 which is an area wholly within Warden Hill Ward;**
 - **That a new polling district is created to serve electors in this area that would vote at St. Margaret's Hall;**
 - **That this new area to be called North Ward;**
 - **That the area is represented by two parish councillors;**
 - **That the boundary not be extended to cover the area in Park Ward.**

7. Up Hatherley proposals - consultation and feedback

7.1 The parish council and ward councillors Park and Warden Hill wards were invited to comment on the working group's proposals. The parish council requested that the Council look at the voting intentions of the Hatherley Road residents to determine which way they voted and if polling arrangements can be sorted to ensure their inclusion. This has been carried out and is referred to in para 6.8. Cllr. Wilkinson requested that the views of the residents of that section of Hatherley Rd be taken into account when a final decision is made. Cllr. Mrs Ryder was happy with the proposals to enlarge the area of the parish council to include the area of Warden Hill ward. She had some reservations about the size of the polling district that would be created if the area in Park ward was taken into the parish council. Cllr. Oliver and Cllr. Harman agreed with Cllr. Mrs Ryder's comment.

8. Leckhampton – additional area.

8.1 The CGR Working Group initially considered the responses to the consultation by four smaller blocks. The results showed that respondents in three of the four blocks had voted in favour of their area being parished but that the fourth block, south of Charlton Lane had voted against being parished. Details of the consultation responses are set out in appendix 2.

8.2 Leckhampton with Warden Hill Parish Council sought clarification from the working group about the intentions of the council with regard to the possible sub-division of the area. The recommendation in the July council report referred to

“The addition of a consultation area for Leckhampton with Warden Hill Parish Council”

Yet the appended map illustrated the four blocks.

8.3 The consultation document issued to electors however, did not refer to the possibility of subdividing the consultation area, nor was this illustrated on the map.

8.4 The Parish Council's views on the matter, after some lengthy deliberation, were as follows:

8.5 *We are quite happy otherwise for just areas 1, 2 and 3 to come into the Parish or for all four areas to come in if you decide that is better.*

8.6 The CGR Working Group, having sought legal advice, considered the matter in detail and proposed to treat the four blocks as one area for the following logical reasons.

- The proposed extended parish boundary aligns with the Leckhampton ward boundaries
- The polling district arrangements are much simpler

8.7 In addition, the Working Group was mindful that when taken as a whole, there was a majority of 56% in favour of being parished.

8.8 **In terms of boundaries, the Working Group's recommendation is therefore as follows:**

8.9 **That the boundary of Leckhampton with Warden Hill Parish Council be altered to include the additional area as shown in appendix 5.**

8.10 The Working Group went onto consider the implications for parish warding, polling districts and representation for this additional area.

- 8.11** The area to the west of Leckhampton Road comprises of polling district IC - This area would be added to the Leckhampton Parish Ward. These electors currently vote at Leckhampton Primary School in Hall Road where there are two polling stations as electors in polling district IB vote here as well. The two polling districts could be merged into one called IB as they would be both parished and vote at the same station. However there would be no changes to where electors would vote.
- 8.12** The area to the east of Leckhampton Road. If this is to be included it is suggested that these areas are kept together (currently polling district IA) and for these electors to continue to vote at Zion Hall, Pilley Lane.
- 8.13** Using the current ratio of councillors to electors to increase Leckhampton Parish Ward from 5 to 11 councillors.
- 8.14** **In terms of parish warding, polling districts and representation, the CGR Working Group's recommendations are therefore as follows:**
- **All areas to be added to the Leckhampton ward of the parish council;**
 - **To increase the number of parish councillors for Leckhampton Parish Ward from 5 to 11;**
 - **Areas to the west of Leckhampton Road to remain in IC (which could be merged with IB to create one polling district) and vote at Leckhampton Primary School;**
 - **Areas to the east of Leckhampton Road to remain in IA and vote at Zion Hall.**

9. Leckhampton proposals - consultation and feedback

- 9.1** The parish council and ward councillors Leckhampton and Warden Hill wards were invited to comment on the working group's proposals. The parish council replied that they did not see any problems with what was being proposed. In a joint response from Cllr Mrs Ryder and Cllr Oliver, they set out that they were happy to agree with what was being suggested by the working group for Leckhampton with Warden Hill at this present time. However, they went onto highlight that the size of the Leckhampton side of the Parish will now require more councillors, which in total will be 10 (now 11) leaving Warden Hill with only 7 councillors and that this may unbalance decision making. Cllr. Nelson indicated that he was happy with the recommendations.

10. Leckhampton Hill extension request

- 10.1** LwWHPC have, since the close of the consultation, returned to the council with a proposal to include an additional piece of land in the parish, see appendix 7.
- 10.2** The chair of the parish council, Adrian Mears said:
- 10.3** *"LwWH Parish Council is interested in incorporating this land into the Parish because it is important amenity space serving many residents in Leckhampton and Charlton Park. The Parish Council considered in 2014 putting the land forward as a Local Green Space. The land has a multitude of public footpaths. One of the important roles of the Parish Council is to maintain local footpaths, mainly on the Leckhampton Fields but also on Leckhampton Hill. The Parish Council also contributes funds to FOLK to support this role"*
- 10.4** The CGR Working Group has not had chance to consider this proposal and is therefore unable to put forward a recommendation to Council on this matter.

- 10.5** One Legal advises that, although unoccupied, the proposals for this piece of land would need be given a public consultation of similar style and length to that of the rest of the review to provide reasonable opportunities for the land owners and interested parties to express their views.
- 10.6** The officer recommendation, having taken legal advice, is that this additional boundary extension request be put out to public consultation to provide reasonable opportunities for land holders and interested parties to express their views. Therefore, it is intended that the proposal be put out for public consultation and for that consultation to close in early January and that the Chief Executive be requested to consider the responses and make a recommendation to Council so that the recommendation can be notified to consultees as early as possible before the Council meeting scheduled for later in January.
- 10.7** In terms of the consultation, it is proposed that all landowners within the area are written to as well as those electors within the proposed additional area LwWH Parish Council referred to in section 6 and appendix 5.
- 10.8** Initial light touch consultation has been undertaken with ward councillors for Charlton Park, in which the area sits, and with the Friends of Leckhampton Hill and Charlton Kings Common.
- 10.9** *"I see no reason why it should not be included in a parish. Charlton Kings Parish Council also does some good maintenance work on footpaths on private land within its parish, for example on Timbercombe Hill, with the various owners' consent. I hope they are successful..."* Julius Marstrand – Friends of Leckhampton and Charlton Kings Common (FOLK).
- 10.10** Therefore, the recommendation is as follows:
- 10.11** **That additional consultation is undertaken regarding the request to further extend the boundary of Leckhampton with Warden Hill Parish Council to include the area as shown in appendix 7**
- 11. Prestbury Parish Council – inclusion of St Nicholas Drive properties**
- 11.1** The Working Group noted that of the 8 properties consulted with, 5 responded (63% response rate). Of those, 3 out of the 5 (60%) voted to be included in Prestbury Parish. The map of the area in question is shown in appendix 6.
- 11.2** The Working Group went onto consider polling districts implications.
- 11.3** The properties currently sit in polling district MC. It is recommended that the 8 properties be merged with polling district MB. There will be no change to their polling station and they would continue to vote at the porta cabin in St Nicholas Church.
- 11.4** **The CGR Working Group's recommendations are therefore as follows:**
- 11.5** **That the boundary of Prestbury Parish council be altered to include the area of St Nicholas Drive as shown in appendix 6;**
- 11.6** **All 8 properties are added to the Prestbury North Ward;**
- 11.7** **These properties are added to polling district MB.**

12. The Reorganisation Order

12.1 If Council is minded to agree the recommendations of the CGR Working Group to alter the boundaries of the parish councils, it must make a reorganisation order. This is legal document that will set out the electoral arrangements, the precept, the transition arrangements and the transfer of any assets liabilities and services. It will set out in detail:-

- The additional areas to be covered by the Parish Councils
- The date on which the new boundaries will come into effect
- The electoral arrangements for the additional areas
- The date of elections to the Parish Council on its new boundaries
- The precept for householders living in the additional areas
- The effect on the parish precept of the additional areas
- Any interim arrangements

12.2 The reorganisation must become effective by no later than 1st April 2018 in order that elections can be held in May 2018.

13. Next Steps

13.1 The CGR Working Group was mindful of the DCLG guidance on community governance reviews and the requirements to both publish its recommendations and ensure that those who may have an interest are informed of them. It is also aware of recent case law whereby a judgement was taken against a principal council that had failed to inform residents of proposed changes - *The Queen on the Application of Campbell Park Parish Council v Milton Keynes Council* [2012] EWHC 1204 (Admin).

13.2 The working group is recommending that the council takes a precautionary approach and writes back to all the electors that were originally written to as part of the community governance review consultation.

13.3 The proposed timescales are as follows:

Full Council to agree recommendations from working group	11 December 2017
Inform those electors originally written to of the Council's intentions with regard to the community governance review	Letters distributed w/c 1 January 2018
Agree and publish the Reorganisation order	w/c 22 January 2018
Parish councils to agree precepts	By 31 January 2018
Precept for new parish council included in council budget	18 February 2018
Re-publish electoral register and consequential electoral arrangements	1 March 2018
First elections to the new parish council boundaries	3 May 2018

Report author	Contact officer: Richard Gibson Strategy and Engagement Manager Richard.gibson@cheltenham.gov.uk 01242 235 354
Appendices	<ol style="list-style-type: none"> 1. Risk Assessment 2. Community Governance Review –summary of responses 3. Charlton Kings Parish Council proposed boundary alteration 4. Up Hatherley Parish Council – proposed boundary alteration 5. Leckhampton with Warden Hill Parish Council proposed boundary alteration 6. St. Nicholas Drive – properties to be added 7. Leckhampton Hill
Background information	<ol style="list-style-type: none"> 1. Community Governance Review Report to Council 27 March 2017 2. Community Governance Review Report to Council 24 July 2017 3. Guidance on community governance reviews – DCLG March 2010

The risk				Original risk score (impact x likelihood)			Managing risk				
Risk ref.	Risk description	Risk Owner	Date raised	Impact 1-5	Likelihood 1-6	Score	Control	Action	Deadline	Responsible officer	Transferred to risk register
	Reputational risk if Council does not approve recommendations put forward through the community governance review.	Chief Executive	27.3.17	2	2	4	Reduce	Report and recommendations based on the results of the consultation to be brought back to Full Council for approval.	December 2017	Richard Gibson	
	Financial and reputational risk if the Reorganisation Order is not approved before 31 January 2018, since the revised Tax Bases for the affected areas must be declared on or before that date. If the Order is not approved in February 2018 the Tax Bases and the parish precepts including the additional areas will then be incorrect, resulting in incorrect council taxes for the affected parishes	Chief Executive	27.3.17	5	2	10	Reduce	The Reorganisation Order must be approved before 31 January 2018.	January 2018	Richard Gibson	
<p>Explanatory notes</p> <p>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)</p> <p>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)</p> <p>Control - Either: Reduce / Accept / Transfer to 3rd party / Close</p>											

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07/11/2017

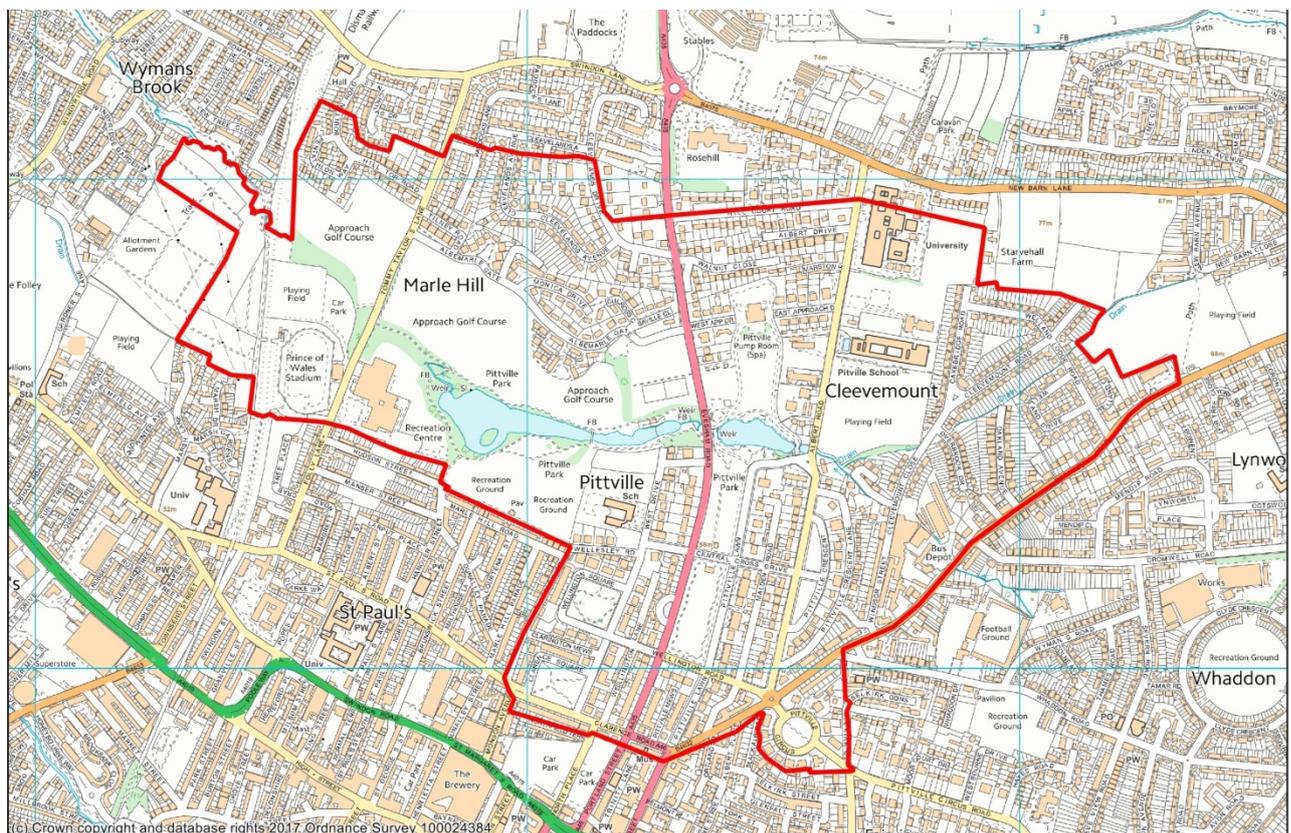
The figures below show the responses received to the consultation, undertaken by Cheltenham Borough Council that closed on 8th October 2017.

Overall count

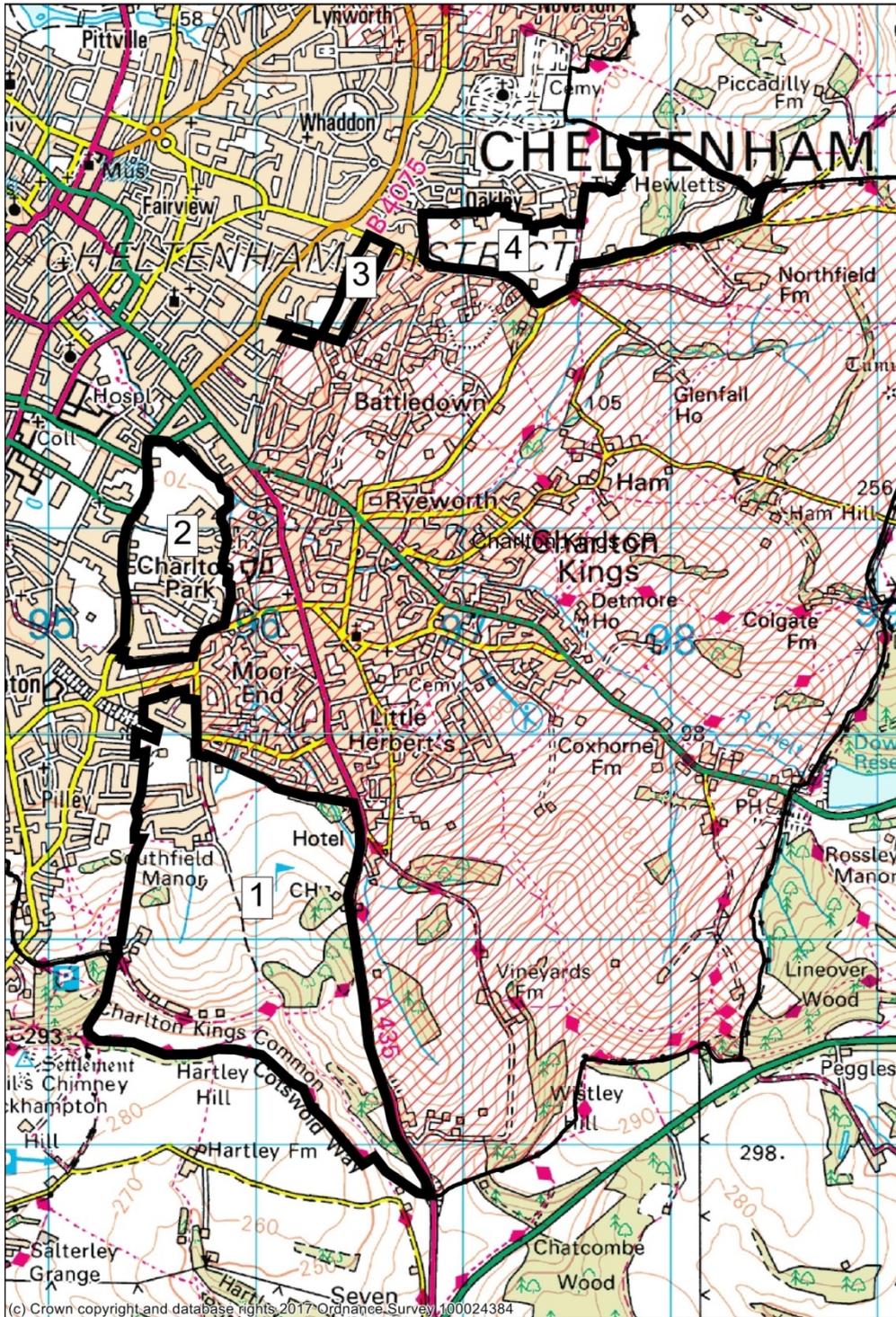
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Anomalies	10	0	10	21	47.62
Total	2515	569	3084	9396	32.82

Summary of responses

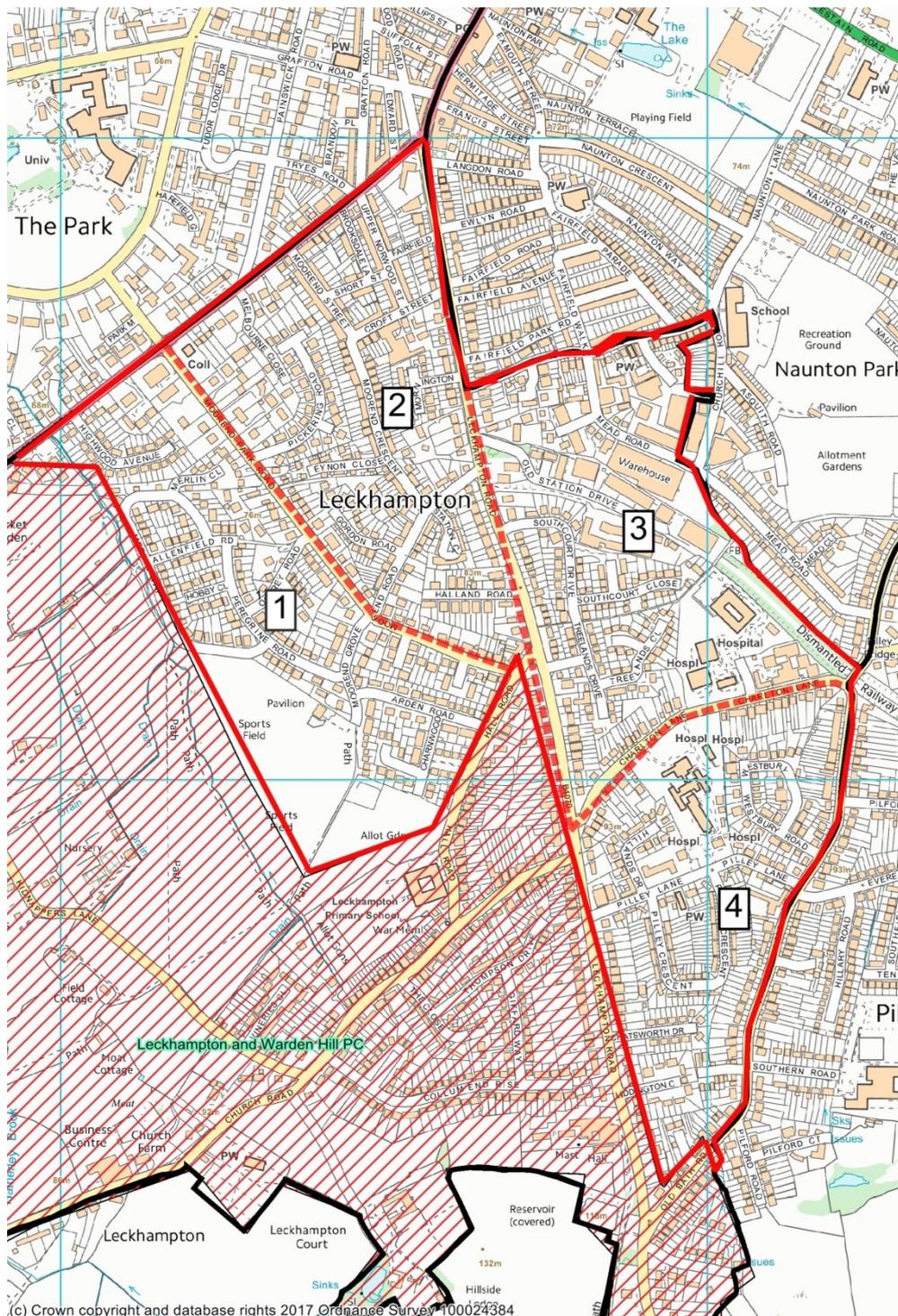
Total responses received	yes count	yes %	no count	no %	total responses
Pittville - total	571	40.79	829	59.21	1400



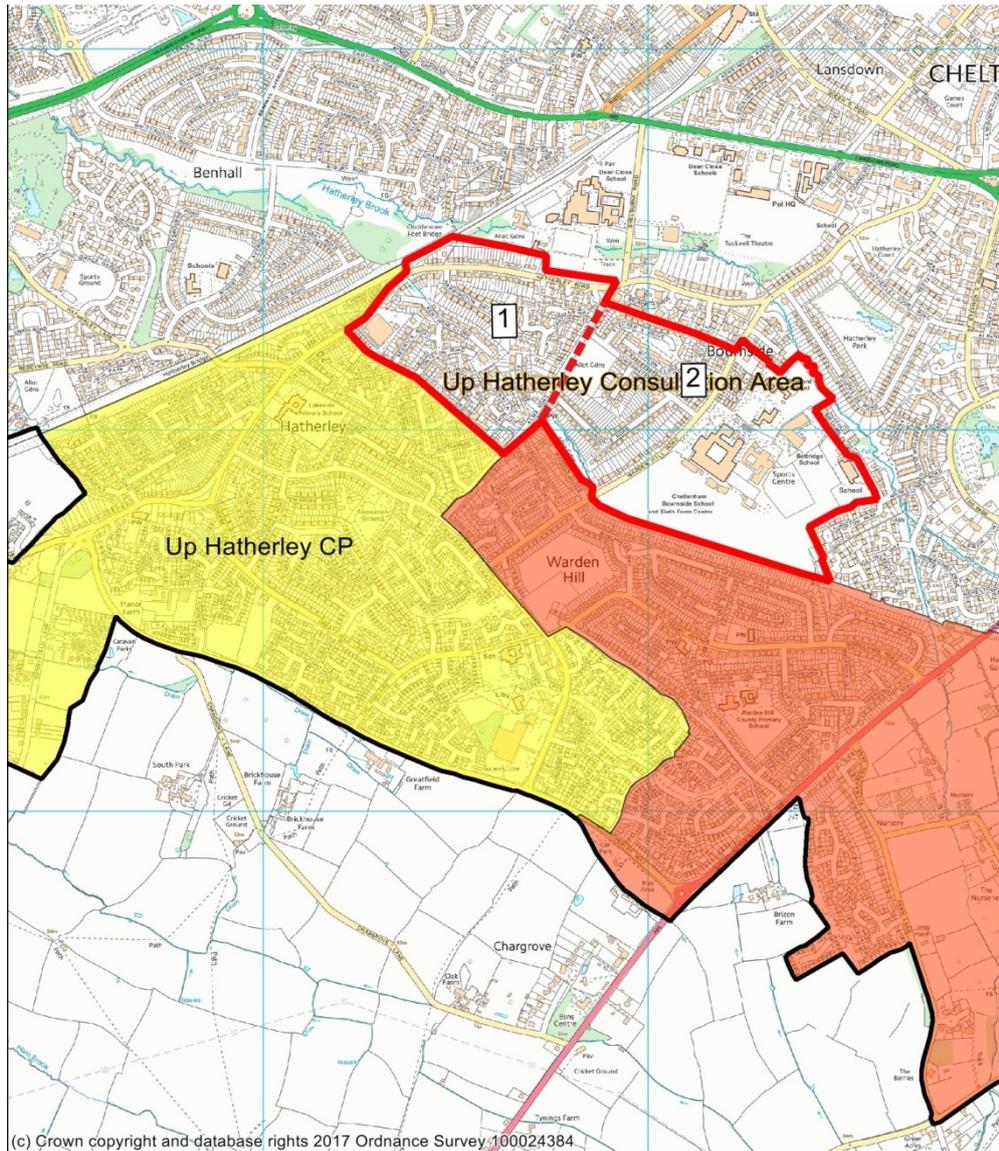
Total responses received	yes count	yes %	no count	no %	total responses
Charlton Kings 1	118	67.82	56	32.18	174
Charlton Kings 2	124	55.11	101	44.89	225
Charlton Kings 3	18	75.00	6	25.00	24
Charlton Kings 4	23	82.14	5	17.86	28
Charlton Kings - total	283	62.75	168	37.25	451



Total responses received	yes count	yes %	no count	no %	total responses
Leckhampton 1	119	63.30%	69	36.70%	188
Leckhampton 2	137	55.02%	112	44.98%	249
Leckhampton 3	96	57.14%	72	42.86%	168
Leckhampton 4	88	48.62%	93	51.38%	181
Leckhampton - total	440	55.98%	346	44.02%	786



Total responses received	yes count	yes %	no count	no %	total responses
Up Hatherley 1	166	66.14	85	33.86	251
Up Hatherley 2	88	47.31	98	52.69	186
Up Hatherley total	254	58.12	183	41.88	437



Total responses received	yes count	yes %	no count	no %	total responses
Merestones	2	40.00	3	60.00	5
St. Nicholas Drive	3	60.00	2	40.00	5

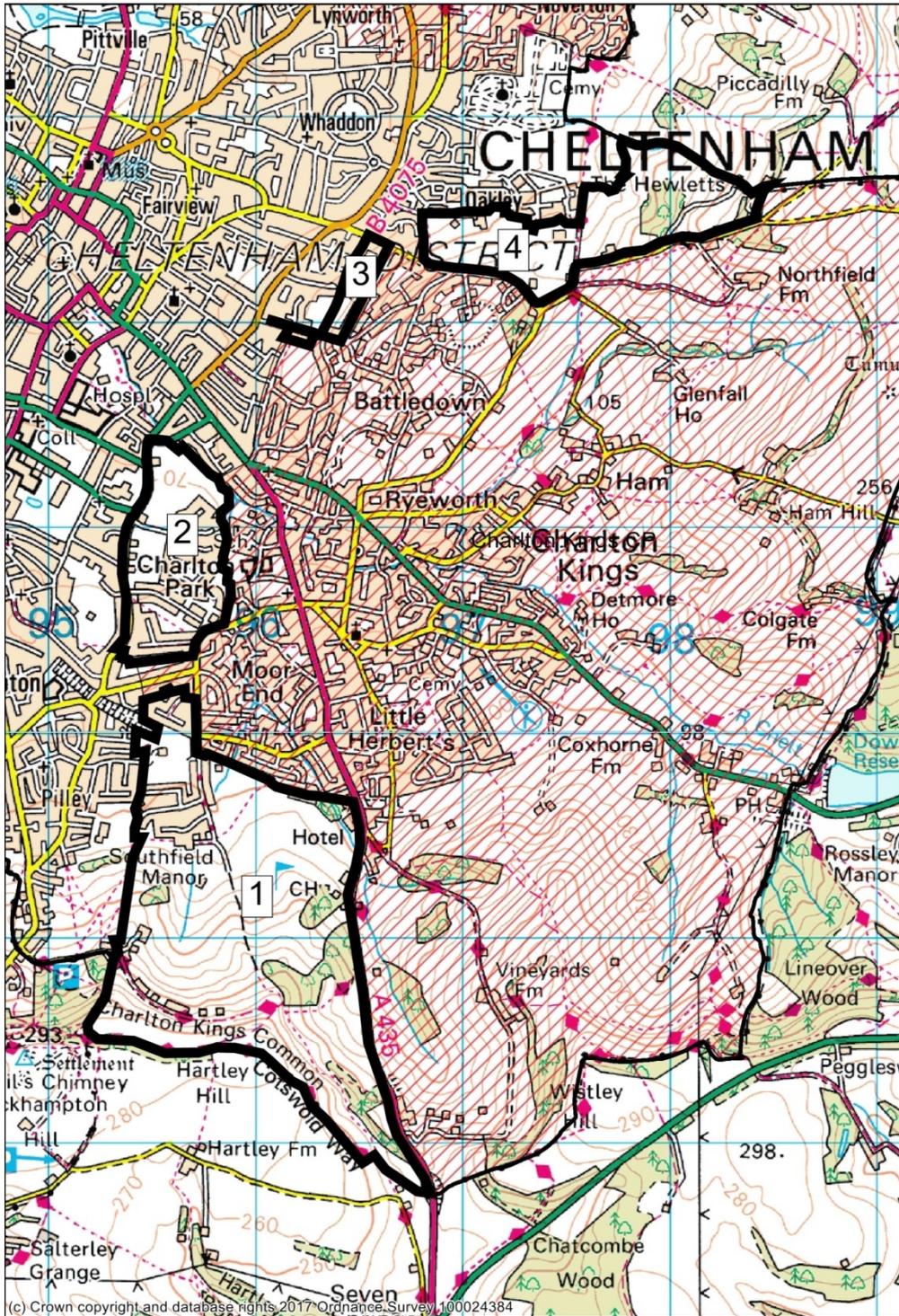
Merestones Drive

These two properties were required by the review to have a full consensus for the changes to go ahead. As one property voted yes and the other no, no change will take place.

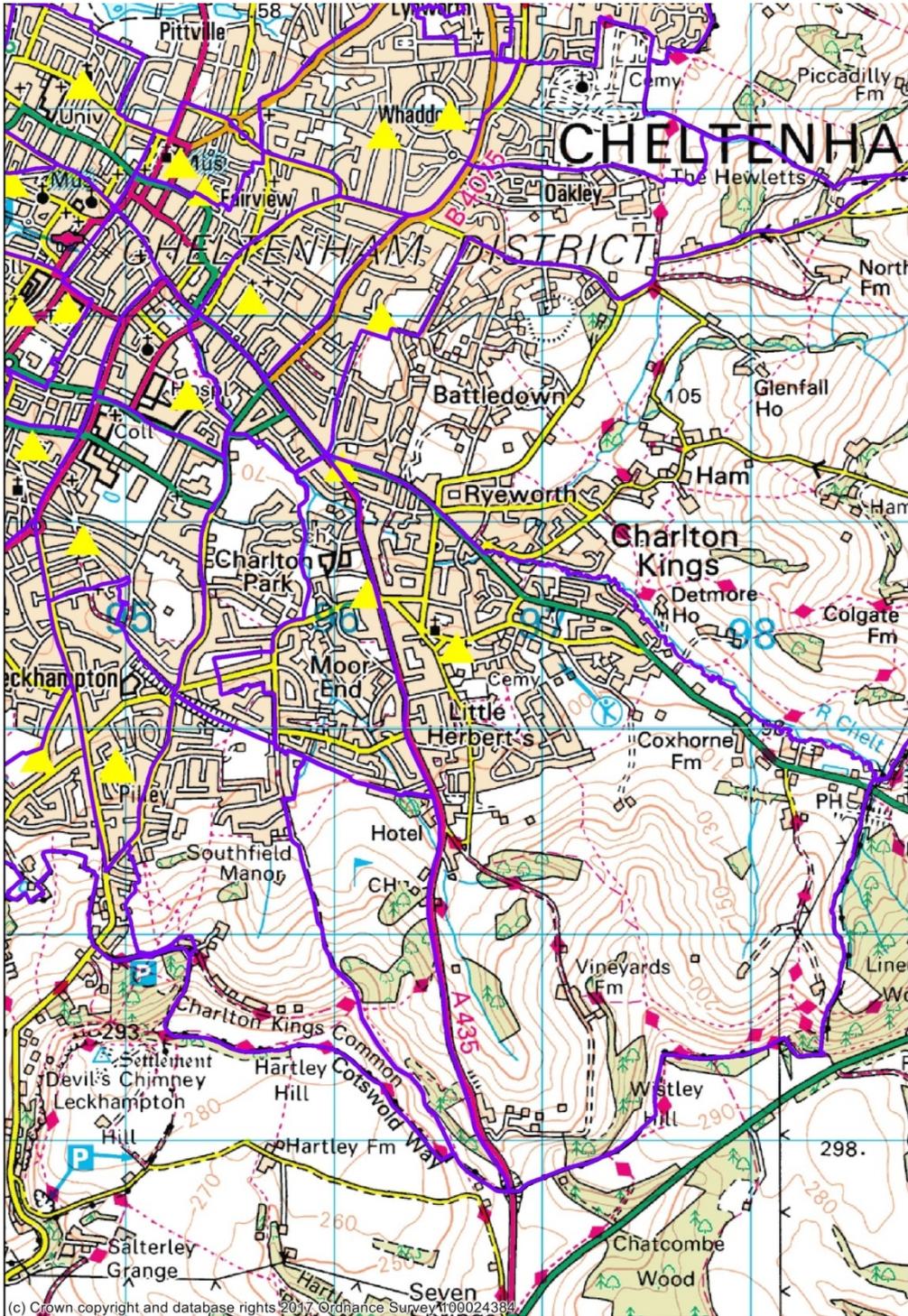
St Nicholas Drive: Electors in three properties voted; the majority voted for their area to be included as part of Prestbury Parish Council

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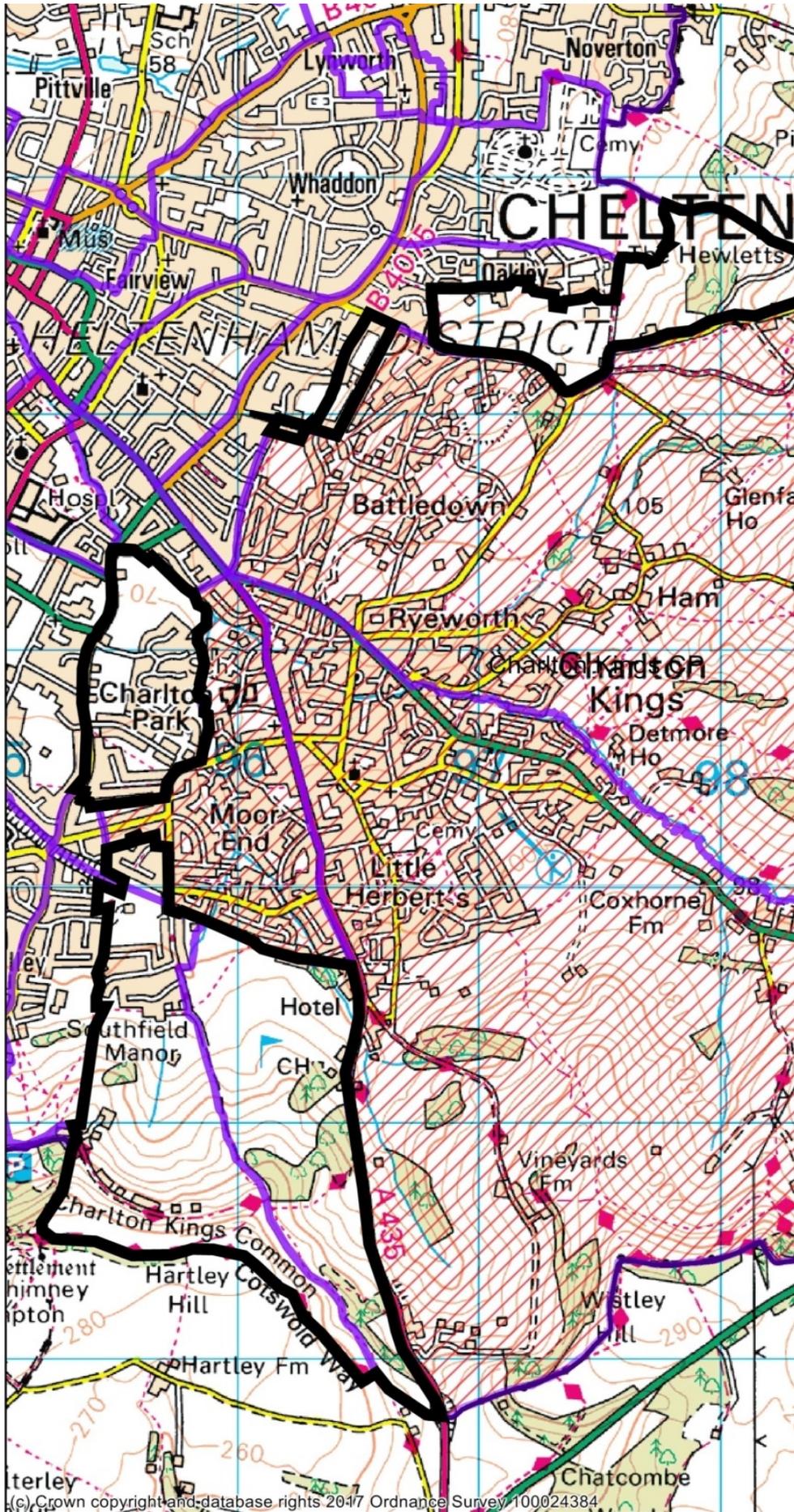
Consultation areas – areas to be added



Current Polling Districts and Polling Station



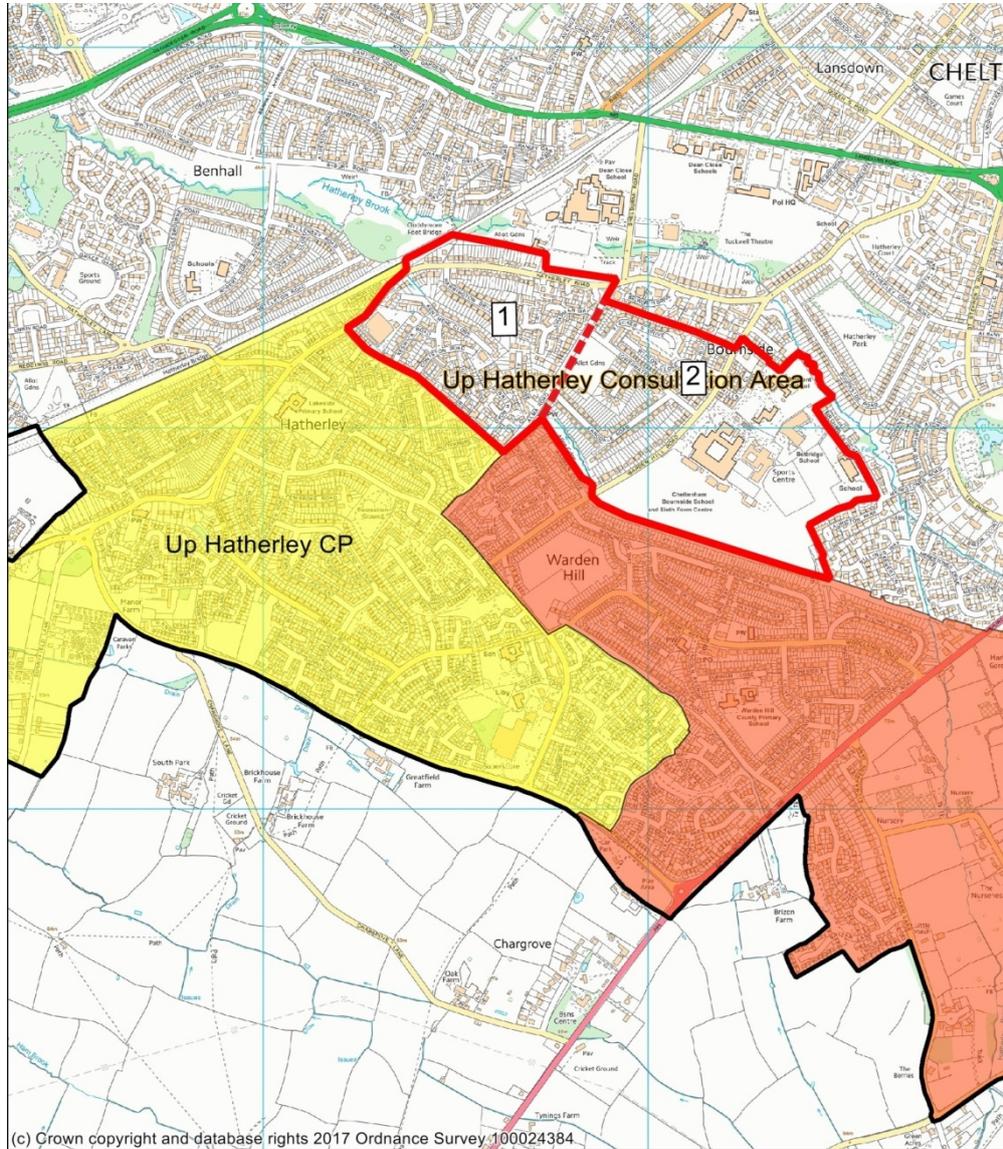
Overlay of proposed areas to be added with polling districts



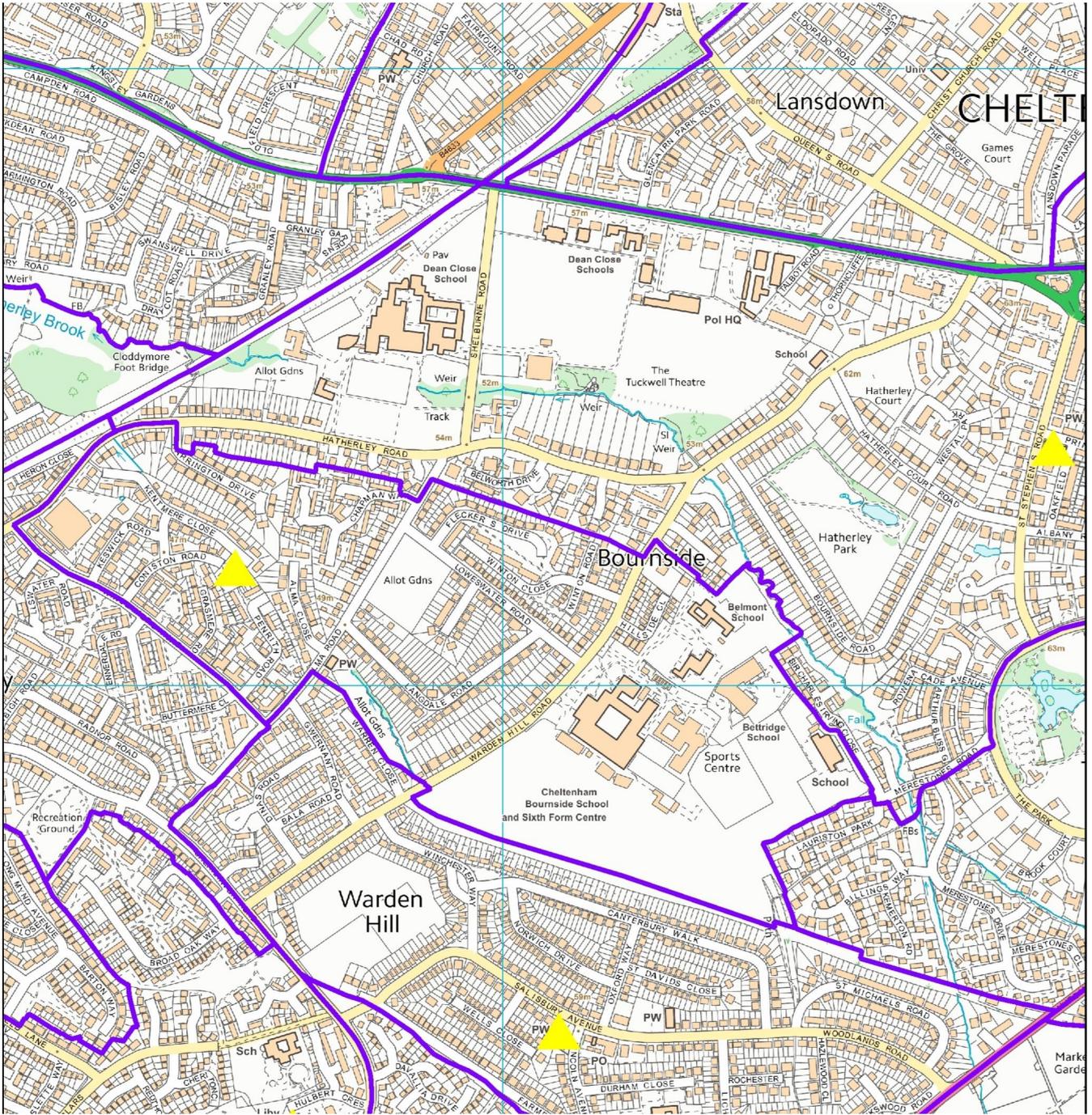
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Appendix 4 - Up Hatherley Parish Council – proposed boundary alteration

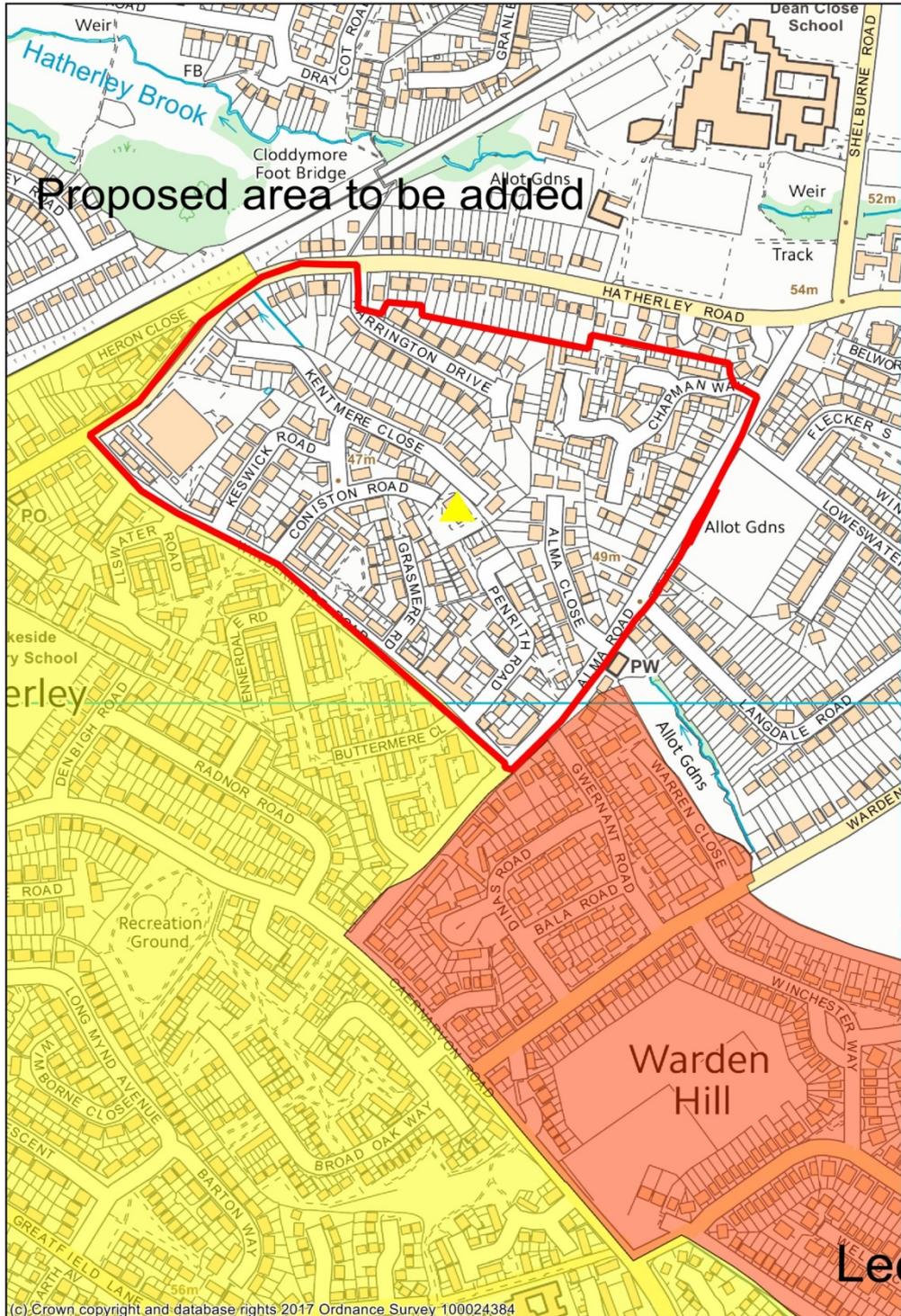
Consultation areas



Current Polling Districts and Polling Station



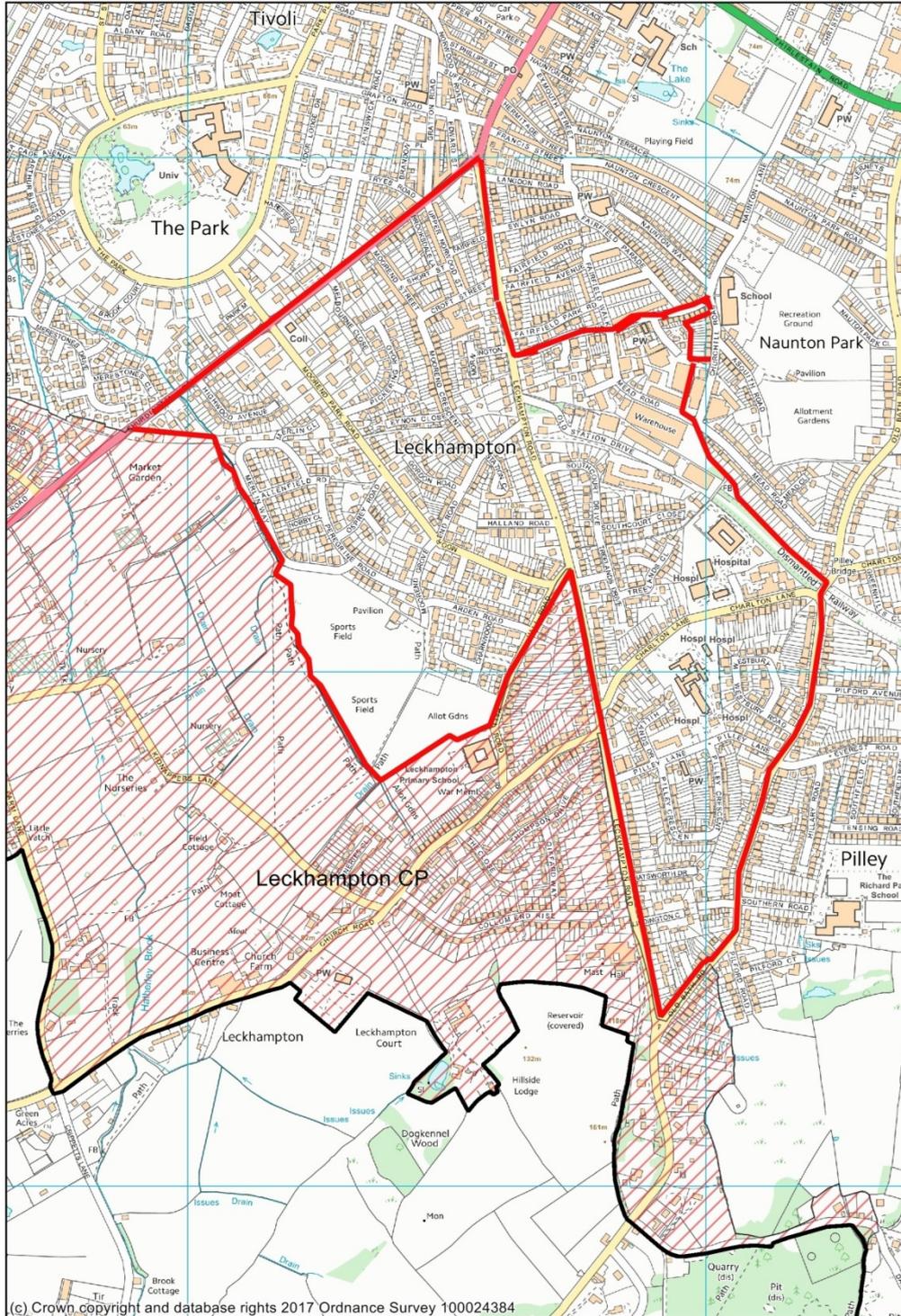
Up Hatherley – proposed area to be added which is an area wholly within Warden Hill Ward



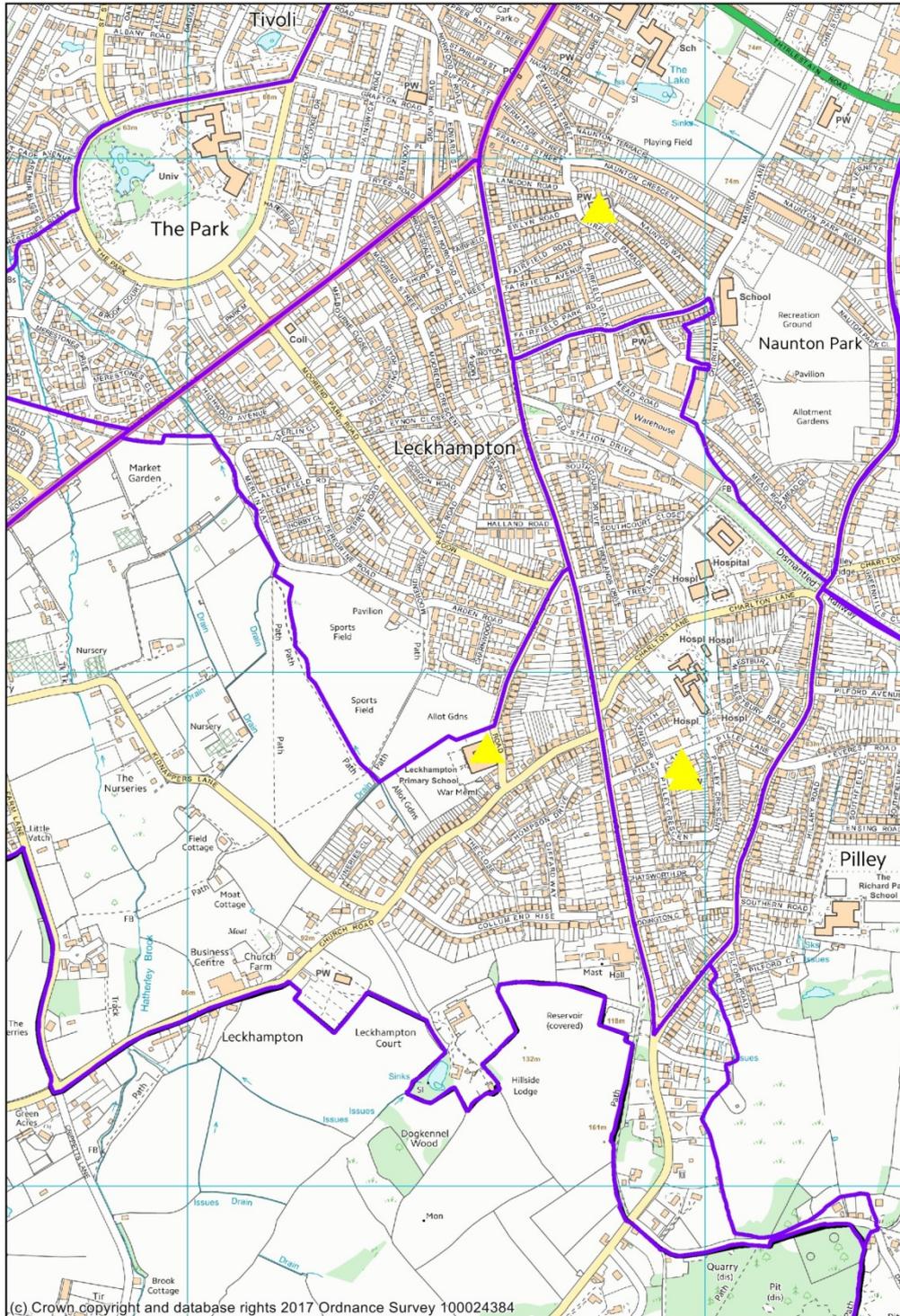
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Appendix 5 - Leckhampton with Warden Hill Parish Council proposed boundary alteration

Consultation areas – area to be added



Current Polling Districts and Polling Station



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Cheltenham Borough Council

Cabinet 5 December 2017

Council 11 December 2017

Revised financing arrangements for improvements to Leisure-at-Cheltenham

Accountable member	Cllr. Flo Clucas; Cabinet Member Healthy Lifestyles
Accountable officer	Mark Sheldon, Director Resources and Corporate Project
Ward(s) affected	All
Key/Significant Decision	Yes
Executive summary	<p>Council on 27 March 2017 gave approval to lend The Cheltenham Trust up to £1.5m to fund a range of improvements to Leisure-at-Cheltenham. The loan was to be at an interest rate of 3% per annum. The proposed works were as follows:</p> <ul style="list-style-type: none"> • Convert two existing squash courts into new studios to enable an increase in the number of class and activity programmes. • Upgrade the existing dry-side changing spaces to reflect the quality of offer that customers expect and that competes well with the local market. • The provision of a new sauna and steam room suite adjacent to the new changing rooms, strengthening the link with health and fitness and replacing the outdated existing health suite facilities. • Extend the existing fitness suite on the ground floor into the current dance studio enabling an increased capacity to meet demand and enable improved functional training space and health support related activities. • Conversion of the existing health suite into an aquatics play space, developing and extending the aquatics opportunities for families with young children and also the commercial hires for children’s birthday parties. <p>Following on from the Council decision, the Trust worked with its development partner Alliance Leisure Services (ALS) to advance the scheme within the agreed financial framework. After much deliberation, it has been concluded that this is not possible. A summary of the reasons for this cost increase are provided in section 2</p> <p>Part of the reason for the cost increase is that the suite of capital works that would be delivered through the partnership with Alliance Leisure Services has been revised. This includes the original elements included in the March council report but also now includes improvements to the reception and entry arrangements, plus improvements to the swimming changing facilities (funded by a grant from Sport England) and improvements to the air conditioning (funded by CBC). Details of the updated capital works are set out in section 3.</p>

	<p>In terms of the revised capital costs, there is now cost certainty of build and equipment costs of £1.658m excluding the aquatics play-space which is estimated to cost £731k that will be confirmed at the date of this report to Council. In addition, provision has been made for client contingency and client support costs, giving total estimated scheme costs of £2.554m. Once grant funding and other contributions are taken into account, the revised funding requirement is £2.236m. This is the maximum figure that is being considered. Further details of the costs of the scheme are provided in section 4 and exempt appendices 1 and 2.</p> <p>Council is also asked to consider a revised approach to managing the financing and project management of the scheme which will entail the Council contracting direct with Alliance Leisure Services who will then deliver the project on behalf of the Council as asset owner. Further details of the procurement and contractual arrangements for the project are provided in section 5.</p> <p>Given the size of the project, the council is putting robust plans in place to ensure that there is effective project governance in place via the Joint Commissioning Group, and effective project management arrangements in place via the contract with Alliance Leisure Services which will be further enhanced through additional client-side resources to support staff members in the Property Services team. Details of project governance and management arrangements are provided in section 6.</p> <p>Given the increase in costs, and the revised approach for managing the project, this report is brought back to Cabinet / Council to seek approval.</p>
<p>Recommendations</p>	<p>That Cabinet:</p> <ol style="list-style-type: none"> 1. Approve the revised programme of improvements to Leisure-at-Cheltenham as set out in section 3 of this report. 2 Delegates authority to the Director Resources and Corporate Projects, in consultation with the Cabinet Member Healthy Lifestyles and the Borough Solicitor to enter into a contract with Alliance Leisure Services and any other legal agreements and processes necessary to progress the scheme whilst safeguarding the Authority's interest. <p>That Cabinet recommends to Council that:</p> <ol style="list-style-type: none"> 1 Subject to the conditions in section 7 being met, the Section 151 Officer be authorised, in consultation with the Cabinet Member Finance, to seek prudential borrowing of up to £2.236m at an interest rate of 2% per annum to fund the improvements to Leisure-at-Cheltenham as detailed in Section 3 of this report; 2 The Section 151 Officer be authorised, in consultation with the Cabinet Member Healthy Lifestyles, to agree the most advantageous repayment methodology to reclaim the cost of the borrowing from the Cheltenham Trust;

Financial implications	<p>The financial business case demonstrates a surplus of £1.291m (average 3.61% rate of return) to The Cheltenham Trust over a period of 15 years, after allowing for funding repayments to the council. The proposed repayments will be made by the Cheltenham Trust to the Council over a period of 15 years, commencing 1st April 2019.</p> <p>The predicted surplus is based on growth in income projections from the capital scheme, based on current and future expected income trends. If this income growth is not achieved, or if annual running costs are higher than estimated, there is a risk that the accumulated surplus may be reduced, with a possible impact on the affordability of the repayments by The Cheltenham Trust to the council.</p> <p>Full details of the capital scheme costs and the financial business case are included in the exempt appendices 2 and 3 to this report.</p> <p>Contact officer: Sarah Didcote GO Shared Services Finance Manager <u>Sarah.Didcote@cheltenham.gov.uk</u> 01242 264125</p>
Legal implications	<p>CBC is intending to engage Alliance Leisure Services Limited (ALS) to provide Development Management Services from a framework agreement established by Denbighshire County Council. Properly established framework agreements are compliant with the Public Contract Regulations 2015 and this framework allows for the award of a contract to ALS without the need for a procurement exercise.</p> <p>ALS's roles and responsibilities will be set out in a 'call-off agreement' which will be entered into between ALS and CBC. The terms of the call-off agreement are contained in the framework agreement and legal advice has been given to officers on those terms. A project specific call-off agreement will be required to be entered into before work can commence on site.</p> <p>ALS will not be carrying out the designs or building work itself. Instead, ALS will be sourcing the services of certain professionals and the build contractors and it will be ALS that enters into the relevant contracts, including a JCT (Joint Contracts Tribunal) Design and Build Contract. CBC will be paying for the cost of the works through the call-off contract, together with ALS's fee for its development management services.</p> <p>CBC's contractual relationship with these professionals and contractors will be by way of collateral warranties which will enable CBC to take action under the terms of the building contract should there be problems with the works carried out. It is important that CBC and One Legal is able to review and input into the terms of the JCT and the collateral warranties.</p> <p>Additional legal implications are set out in the property and financial implications of this report.</p> <p>Contact officer: Donna Ruck, Solicitor, One Legal Tel: 01684 272696 <u>Donna.ruck@tewkesbury.gov.uk</u></p>

HR implications (including learning and organisational development)	CBC staffing resources available to oversee this project have been reviewed and an additional resource will be funded via the funding arrangement to support staff in the Property Services Team.
Property/Asset Implications	<p>Leisure@ Cheltenham is currently leased to the Trust on a 15 year term starting on October 2014.</p> <p>As the council is undertaking the work, we need to enter into arrangements with the Trust to bring clarity to two issues:</p> <ol style="list-style-type: none"> 1. Who will own the equipment and take on the responsibility of any additional maintenance costs. 2. The Council needs the Trust's permission to enter on to their premises and undertake the works <p>The Property Team will review the management agreement and lease with One Legal to document the agreed position with the Trust in relation to the above two points.</p> <p>In terms of safeguarding the asset, the council will ensure that all detailed designs (RIBA stage 4) are approved in the first instance by the Council's Senior Property Surveyor.</p> <p>To support the Senior Property Surveyor, CBC will make provision for representation to be on-site for each day of the to report to JCG/Project Team that the specification is being adhered too and workmanship is up to standard. A sum of £30k has been included in the capital budget to fund this.</p> <p>Although equipment replacement has been factored into the business plan, officers are aware that there could be an increase in both maintenance costs and energy use costs that will fall on the Council. The Senior Property Surveyor will work with the Trust and ALS to analyse these impacts that will then be reported to the project team / Joint Commissioning Group as appropriate.</p> <p><u>Contact officers:</u></p> <p>Abigail Marshall Estates Surveyor Abigail.Marshall@cheltenham.gov.uk 01242 775166</p> <p>Garrie Dowling-Burrage Senior Property Surveyor garrie.dowling@cheltenham.gov.uk 01242 264394</p>

<p>Key risks</p>	<p>There are two key areas of risk for the council:</p> <p>The Council is proposing to fund the capital improvements and seek repayment from the Trust which will be unsecured because the Trust does not itself own any land or buildings. This is a risk to the council because in the event of default on the loan, there will be no property that CBC can repossess. This is a risk that CBC has taken at least once before with other external organisations operating from within council owned buildings. The Council owes a fiduciary duty to its council tax payers to ensure that the business case is sound so that it can be sure that the Trust can afford repayments.</p> <p>Secondly, the term of the repayment arrangement is 15 years, and there is less than 7 years of the certain term of the management agreement with the Trust remaining. If the Council were not to extend the management agreement and as a result if the Trust needed to wind itself up, it must clear all its debts. If it cannot repay the repayment arrangement, the council would need to seize any assets of value and potentially write off any remaining repayments.</p> <p>In mitigation against these two risks, as CBC owns the building, the loan will be spent on improving its asset and the works may add value to it and to CBC's financial position.</p>
<p>Corporate and community plan Implications</p>	<p>Successful delivery of the project by the Cheltenham Trust will help the council deliver its corporate strategy outcome:</p> <ul style="list-style-type: none"> • People live in strong, safe and healthy communities
<p>Environmental and climate change implications</p>	<p>The range of improvements to Leisure-at-Cheltenham will be built in accordance with the environmental specifications set out in the latest building regulations.</p>

1. Background

- 1.1 The Cheltenham Trust was established as a consequence of a commissioning review into how best the Council could continue to support the delivery of its leisure and cultural services, and the management of five properties (The Wilson, Town Hall, Pittville Pump Room, Leisure at Cheltenham, Prince of Wales Stadium) whilst delivering best value to the taxpayer.
- 1.2 The Trust went live in October 2014 and is in receipt of a declining management fee from the Council:

Year	2014 15	2015 16	2016 17	2017 18	2018 19	Total
Management Fee	£1,666k	£968k	£764k	£648k	£641k	
Net reduction	£0	-£698	-£204	-£116	-£7	-£1,025

- 1.3 Leisure-at-Cheltenham is currently leased to the Trust on a 15 year term that started on October 2014. It hosts over 570,000 visits per year and offers a wide range of facilities to a broad customer base. Customers come to the facilities from Cheltenham and surrounding areas and its regional and national competition events attract people from all over the UK.
- 1.4 The Council has encouraged the Trust to develop a vision for the Leisure-at and Prince of Wales stadium.
- 1.5 The Trust has subsequently come back with their vision for Leisure-at. This is:
- To develop a hub within the town that encourages public participation in diverse experiences that touch and inspire people be it through sport, culture, play, competition, heritage, learning, health and wellbeing. The ambition is to put Cheltenham at the forefront nationally, creating a unique place that contributes to the social, cultural and economic value of the town and enriching the lives of residents and visitors.*
- 1.6 In March 2016 the Cheltenham Trust commissioned an initial feasibility study and developed a two-phase approach to creating a hub at Leisure-at-Cheltenham. The proposals were presented to the Council in the autumn of 2016 and the first phase element was endorsed as a robust first step to delivering the broader vision. The second phase included works to re-orientate the entrance and reception along with the provision of a large adventure play facility and it was agreed not to progress these at this point.
- 1.7 These first phase proposals were worked up, and were then brought to Council in March 2017 to agree the proposed works and the financing arrangements, which was to be a 10 year loan of up to £1.5m granted to the Trust which would have been repaid at 3% per annum.

2. Development of the scheme

- 2.1 Following on from the March Council decision, the Trust worked with its development partner Alliance Leisure Services to advance the scheme within the agreed financial framework.
- 2.2 After work to further define the project, it was clear that project costs would be higher, but that these would be mitigated by a greater impact for customers and increases in income against a revised business plan.
- 2.3 In addition, this preliminary work has helped shape how the project will be procured and managed.
- 2.4 The original model presented to the council in March 2017 was based on the Trust delivering the project through a loan from the council. This method for project delivery would have incurred VAT which meant that fewer improvements would have been delivered.

2.5 A preferred method is now proposed whereby the council contract Alliance Leisure Services directly, and by doing so the VAT is recoverable, and the project will deliver greater public benefit for the cost incurred. TCT will benefit from increased income from this investment in order to deliver the outcomes. CBC will take out the loan directly and TCT will repay the funding stream by arrangement with CBC.

2.6 In summary, the period between the March 2017 report and this revised report has provided:

- Cost certainty on the main project;
- Further investigations around ground conditions to fully inform the Splash Pad delivery and to provide cost certainty for the revised report;
- Reviewing the business plan showing the impact of recoverable VAT;
- Reviewing the project to include the entry system;
- Reviewing the project to combine the phase 1 project with other capital works that are being funded from elsewhere.

2.7 The benefits are:

- That cost certainty will be in place before the commencement of the project and signing of the contract with Alliance Leisure Service;
- Confidence about the new framework arrangement and contract type;
- Confidence around risk management;
- Confidence around CBC resources, delivery and monitoring;
- Confidence around change controls, the use of the Joint Commissioning Group as the governance group to limit and monitor change;
- Confidence around the quality of the project and the expectations around quality;
- Confidence around Value for Money and deliverables;
- Confidence around the partnership between the Council, the Trust and Alliance Leisure Services.

3. Details of the revised proposal

3.1 The original improvements March 2017 set out in the Council Report were as follows:

- Convert two existing squash courts into new studios to enable an increase in the number of class and activity programmes.
- Upgrade the existing dry-side changing spaces to reflect the quality of offer that customers expect and that competes well with the local market.
- The provision of a new sauna and steam room suite adjacent to the new changing rooms, strengthening the link with health and fitness and replacing the existing health suite facilities. (This was necessary as the aquatics play space would have replaced the existing health suite)
- Extend the existing fitness suite on the ground floor into the current dance studio enabling an increased capacity to meet demand and enable improved functional training space and health support related activities.
- Conversion of the existing health suite into an aquatics play space, developing and extending the aquatics opportunities for families with young children and also the commercial hires for children's birthday parties (now superseded)

- 3.2** The additional proposals/changes to be funded via the arrangement with CBC and relevant to this report, build on the items in section 3.1:
- Retention of the existing health suite and its associated income streams to further support the business plan (instead of replacement as stated in Section 3.1, the original health suite will now be retained as the aquatics play space has been moved to a different location and will not impact on the health suite)
 - Improved reception and access controls to the facilities and services to ensure that all users are paying users to underpin the business plan
 - Conversion of one teaching pool group change space into the splash pad (aquatics play space), this allows for greater harmony to the existing pool space, ease of access and flow of people. Structural and mechanical implications are less significant compared to the original plan.
- 3.3** In addition, there are other capital works that are being funded from elsewhere that will be included as part of the contract with Alliance Leisure Services:
- 3.4** Swim local; The Trust led a bid to Sport England which comprised two elements, a revenue grant request of £150,981 to fund improvements to the visibility and relevance of the swimming experience and the range of programmes that are on offer. A capital grant request of £184,480 to fund the creation of new disabled changing units and improvements to the female changing area. This grant has now been accepted by Cheltenham Borough Council and the capital works will be included as part of the contract with Alliance Leisure Services.
- 3.5** Air conditioning; the Council has already made a financial commitment of £85,000 to upgrade the air conditioning system. Again, these works will now be included as part of the contract with Alliance Leisure Services.

4. Revised capital costs and business plan assessment

- 4.1** There is now cost certainty of costs of £1.658m excluding the aquatics play space which is estimated to cost £731k will be confirmed at the date of this report to Council, and also excluding client support/contingency at £135k and client support at £30k. The total capital cost of the scheme is therefore £2.554m, subject to cost certainty over the splash pad build and equipment. Full details of this capital cost and secured funding are shown in exempt appendix 2 to this report.
- 4.2** Funding totalling £318k has been secured towards the cost of the scheme, leaving a net funding requirement of £2.236m. Council is asked to consider that this funding is acquired by way of PWLB loans to the council, at an average interest rate of 2% per annum. The loans will be taken out over a period of 7, 10 and 15 years, in accordance with the estimated useful life of the new equipment and building works.
- 4.3** The Cheltenham Trust will repay the council the funding over a period of 15 years, commencing 1st April 2019. The financial business case included in exempt appendix 3 details the expected annual surplus to be retained by the Trust, after allowing for these funding repayments. This demonstrates an accumulated return to the Trust of £1.291m over the period, with an average rate of return of 3.61%. Once grant funding and other contributions are taken into account, the new funding requirement is £2.236m. This is the maximum figure that is being considered.
- 4.4** These repayments are affordable by The Trust, subject to the achievement of the forecast additional income and the estimated additional expenditure not being exceeded. There is a risk, as with all financing arrangements, that should these targets not be achieved there may be an impact on the affordability of the repayments. However, this is mitigated by a review of current income trends and market comparisons, undertaken by the Trust and Alliance Leisure Services. Full details of this income and expenditure of the project are shown in exempt appendix 4 to this report

4.5 The revenue forecast is based on a range of assumptions including:

- Membership income is based on a growth of 625 members or 22% over the term, growth since October 2014 has been 35% therefore the anticipated levels are believed achievable. This is the medium case scenario with sensitivity being completed at 10% variable on income either way.
- Income grows at a moderate level across the term linked to pricing /inflation
- Squash retains 80% of income through fully utilising capacity in the remaining courts
- Splash pad utilisation rates are based on term time v holiday time attendance levels
- CBC funding payments shown as full cost from 2019/20
- Additional food and beverage spend estimated at 10p per user on new attendances and 50p in café spend
- Staff costs for new role based on UK Living wage at £8.45 from April 2017
- Prudent assumption of achieving a recovery of £40k income linked to improved access controls.

5. Procurement and contractual arrangements

- 5.1 Council is also asked to consider a revised approach to managing the financing and project management of the scheme which will entail the Council contracting direct with Alliance Leisure Services (ALS) and who will then deliver the project on behalf of the Council. It will be ALS that contract with the construction company, not CBC. In this regard, Alliance Leisure Services will be a development partner of the Council.
- 5.2 In terms of procurement, Alliance Leisure Services has been procured through the Denbighshire Access Agreement and Framework Contract. This is a 4-year Development Framework that Denbighshire County Council procured after extensive tendering process to demonstrate value for money that complied with OJEU rules. The access framework is available to all Public Sector organisations and utilises JCT or NEC construction contracts.
- 5.3 Under the framework agreement, ALS undertake initial scoping work at risk and work up a feasibility study to determine affordability. Once the final scope of the project is determined by the client, ALS come back with a cost certainty proposal and the client then enters into a call off contract with ALS.
- 5.4 This method of procuring capital works using the development partner route reflects the fact that local councils have decreasing resources to manage larger capital projects and enables councils to:
- Reduce the impact on internal resources in local authorities
 - Obtain cost certainty at the beginning of the contract which is adhered to – cost certainty means cost certainty
 - Gain clarity on what is being delivered as a result of the upfront testing, design and detail prior to signing a contract to provide cost certainty
 - Create best value for local authorities through market costing before the contract is signed and holding to prices throughout the project
 - Transfer the project management and contract management to a readymade team who are experienced in particular areas of work
 - Transfer the financial risk to the partner (Alliance Leisure Services), to protect local authorities from cost over-runs during and/or at the end of the project.

6. Project governance and day to day management

6.1 In terms of project governance, the project will be co-sponsored project between The Cheltenham Trust and Cheltenham Borough Council with strategic oversight being provided by the Joint Commissioning Group. The Joint Commissioning Group is the mechanism by which Cheltenham Borough Council and The Cheltenham Trust work together using a co-commissioning approach to deliver capital development projects relating to CBC owned and TCT managed venues.

6.2 Current membership of the Group is:

Cllr Flo Clucas	Cabinet Member, Cheltenham Borough Council
Jaki Meekings-Davis	Trustee, The Cheltenham Trust
Julie Finch	CEO, The Cheltenham Trust
Mark Sheldon	Director Resources and Corporate Projects, Cheltenham Borough Council
Stephen Petherick	Head of Commercial and Customer Services
Richard Gibson	Lead Commissioner for the Trust, Cheltenham Borough Council
Jackie Rigby	Programme Manager, Cheltenham Borough Council
Garrie Dowling	Senior Property Surveyor

6.3 Scrutiny of the project will be via the Cheltenham Trust's Audit and Governance Committee and the Council's Overview and Scrutiny Committee.

6.4 In terms of project management, this will be undertaken in the following ways:

6.5 **Alliance Leisure Services** (ALS) will manage the project through to completion to an agreed cost and time, owning the risks on overspend and ensuring that adequate on the ground resources is available. The roles included in the contract encompass quantity surveyor skills, architect and project manager.

6.6 ALS will work through **Savernake Property Consultants** (SPC) to manage the project and a sum of £55k is included in the project costings. SPC will provide the following services.

6.7 At design development stage:

- Attend, chair and contribute to design team meetings as appropriate
- Prepare and distribute minutes to meetings
- Co-ordinate design development process and monitor works complete to Gateway Review
- Develop Risk Register
- Monitor and review programme and update as necessary
- Develop Employer's Requirements in conjunction with the Contractor
- Establish checking / approval procedure for technical specification
- Attend additional meetings as necessary with technical representatives to agree specification
- Review outline proposals and indicative cost proposals as they develop and comment
- Design Team meeting attendance
- Negotiation with the contractor to facilitate the preparation of Contractor's proposals, including drawings, schedule of works and specification
- Preparation of building contract documentation
- Check and comment upon the Principal Contractor's Construction Phase Health and Safety Plan

6.8 At site operation stage, SPC will:

- Attend, chair and contribute to construction phase progress meetings on a monthly basis
- Attend monthly site visits to check progress / quality (On site every 2 weeks)
- Prepare and distribute minutes to meetings
- Monitor and review construction phase programme
- Check and report on quality of materials and workmanship on site including checking conformity

to contract documents

- Agree costs of variations and issue contract instructions
- Issue appropriate contract certificates
- Agree stage payments / valuations of works and issue appropriate notices
- Management of building budget and contract variations
- Monthly budget update
- Completion and handover of the works to include preparation of snagging list, approval of final build account and completion certification
- Certification of the retention (1.5% of building contract value to be withheld from the contractor for a period of 12 months from date of completion)

6.9 CBC will appoint a client-side advisor to support CBC's senior property surveyor in overseeing the works. A sum of £30k has been included in the capital budget to fund this. The advisor will be available on-site for a proposed 2 hours/days and will enable the speedy communication of any operational issues back to the Property Services Team. The advisor will report back to the JCG and CBC as necessary on a two weekly basis, attending key meetings, checking quality and quantities and to work with ALS and SPC to capture any exceptions or key risks. This advisor will also sit on the Project Team.

6.10 The Director Resources and Corporate Projects will be the responsible CBC officer for cost and quality delivery.

6.11 In addition, CBC will work with Stephen Petherick, Head of Commercial and Customer Services at the Trust, who will act as a senior user for the project. He will also attend the Project Team.

7. Suggested conditions for progressing the project

7.1 If council are minded to agree the financial framework, it is suggested that the project is progressed subject to the following conditions being met:

7.2 That the overall net funding requirement does not exceed £2.236m;

7.3 That the funding is only to be used in connection with the proposed improvement scheme as detailed in section 3;

7.4 That Cheltenham Borough Council and the Cheltenham Trust have agreed the terms of the 15 year repayment arrangement with the Council;

7.5 That Cheltenham Borough Council and the Cheltenham Trust have agreed the terms as to who will own the equipment and take on the responsibility of any additional maintenance costs and also gain agreement for the Council's contractors to enter on to their premises and undertake the works;

7.6 Subject to these conditions being met, the funding arrangement will then be agreed by the s.151 officer, in consultation with the Cabinet Member Finance.

8. Reasons for recommendations

8.1 The proposed improvement scheme and associated funding arrangements is being recommended for the following reasons:

- The sum will be repaid by the Trust in full over a 15 year period with repayments beginning in 2019/20.
- It will enable much needed investment into Leisure-at-Cheltenham, which is owned by the council and leased to the Trust. This will ensure the building remains an attractive leisure destination for

local residents within a competitive market.

- The investment will increase footfall and therefore income for the Trust.
- The improvement scheme will have direct benefits for local residents increasing their health and wellbeing
- The improvement scheme will support the work of 19 partners who deliver health and wellbeing related activities at Leisure-at.

9. Alternative options considered

9.1 The Council and the Trust have explored two other options:

9.2 DO NOTHING: Continue to maintain the existing facility to ensure it is fit for purpose within resources, in the knowledge that Leisure-at will not be able to meet the demand for business and customer expectations, with reducing appeal and subsequent declining retention and reputation with increased wear and tear on kit and facilities. There will be a negative impact upon economic viability of the business and the Trust. This option has therefore been dismissed.

9.3 COMMERCIAL FUNDING: The Cheltenham Trust could fully fund the capital investment programme without contribution by CBC through seeking a commercial loan. Although on the face of it, this would minimise the risk to the Council in that the Trust business activities would fund the repayments, the Council would need to act as a guarantor for the loan. That would mean assigning an equivalent sum in our reserves to fund this in case the Trust failed. In addition, the cost of the loan would have been higher at an estimated 5%. On advice from the s.151 officer, this option has been dismissed.

Report author	Contact officer: Richard Gibson Strategy and Engagement Manager Richard.gibson@cheltenham.gov.uk 01242 235 354
Appendices	<ol style="list-style-type: none"> 1. Risk Assessment 2. EXEMPT – Capital costs 3. EXEMPT - Income and Expenditure
Background information	Report to Cabinet/Council “ <i>Financing arrangements for improvements to Leisure-at-Cheltenham</i> ” 7 March 2017 / 27 March 2017

Risk Management – Leisure-at Phase 1 Development – November 2017 – Key Strategic Risks

The risk			Original risk score (impact x likelihood)			Managing risk				
Risk description	Risk Owner	Date raised	Impact 1-5	Likelihood 1-6	Score	Control	Action	Deadline	Responsible officer	Transferred to risk register
If the Trust defaults on the repayment, there will be no property that CBC can repossess. Therefore the Council owes a fiduciary duty to its council tax payers to ensure that the business case is sound.	s.151 officer	20.2.17	3	3	9	Accept	1 Ensure that the business case is sound so that it can be sure that the repayments will made.	Feb 2017	Sarah Didcote	
As the term of the loan is 15 years, and there is 7 years of the certain term of the management agreement with the Trust remaining, if the Council were not to extend the management agreement and as a result if the Trust needed to wind itself up the repayment agreement might not be fulfilled.	s.151 officer	20.2.17	4	3	12	Reduce	1 The Council is working with the Trust to bring forward plans for an agreed management fee for the period April 2019 to October 2024. 2 The council would need to be in a position to seize any assets of value. and potentially write off any remaining repayments	Sept 2017	Richard Gibson Donna Ruck	
Financial –if value for money against deliverables and finance option is not achieved, the project will not deliver the dividend described and will be seen as not being successful	Mark Sheldon	17.11.17	3	3	9	Reduce	1. Ensure certainty in contract - costs and outcomes 2. Room data sheets which show project detail have been detailed and costed 3. Ensure legal framework represents cost and time certainty	11.12.17	Mark Sheldon	
Financial – if the project is not delivered on time this will affect the Cheltenham Trust’s ability to develop new income streams and undermine the funding payments to CBC against the PWLB loan and the income proposals in the Trust’s Business Plan	Mark Sheldon	17.11.17	3	3	9	Reduce	1. Through the Joint Commissioning Group (JCG) ensure that the project is delivered to time and budget and manage a robust change control system with contractor	31.5.18	Mark Sheldon	
Financial – if the project costs rise as a result of unexpected site conditions, the overall project costs may exceed those that Council are being asked to approve	Mark Sheldon	17.11.17	3	3	9	Reduce	1. CBC will hold a contingency provision to manage the risk of any other investigation requirements and findings	Throughout the project	Mark Sheldon	
Financial – if the Council fails to make a decision in December 2017, the costs of the project will rise each quarter at a rate of more than 1.5% per quarter	Mark Sheldon	17.11.17	2	3	6	Reduce	1. Ensure that the Cabinet and Council report are supported 2. Ensure that Alliance Leisure provide the cost certainty figures by Council meeting 11.12.17 so that they can make an informed decision	11.12.17	Mark Sheldon	

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The risk			Original risk score (impact x likelihood)			Managing risk				
Risk description	Risk Owner	Date raised	Impact 1-5	Likelihood 1-6	Score	Control	Action	Deadline	Responsible officer	Transferred to risk register
Financial - If the ownership and maintenance responsibilities are unclear then once the works are concluded it could risk the assets depreciating and deteriorating with no clear guidance as to who should be reacting to repair needs. This would put the hoped income generation at risk if areas need to close or do not function as expected. Ongoing day to day management and maintenance costs need to be captured in the Management agreement as well as the lease requiring these two documents being up to date to reflect the proposed works. Uncertainty could lead to loss of income	Mark Sheldon	20.11.17	2	3	6	Reduce	1 This risk is mitigated as this is one of the conditions that need to be met before the works can progress		Mark Sheldon	
Financial - If the Council do not agree in advance of Alliance (and their contractors) being on-site this puts the Council at risk of claims against it, from the Trust, for compensation for Disturbance. To bring this risk down – Property are meeting with One Legal representatives to review current arrangements, and consider the appropriate action to reduce this risk.	Mark Sheldon	20.11.17	2	3	6	Reduce	1 This risk is mitigated as this is one of the conditions that need to be met before the works can progress		Mark Sheldon	
Capacity – if the project management, monitoring and control capacity is not appropriate, the project will not be delivered to time and budget	Mark Sheldon	17.11.17	3	3	9	Reduce	1. The Framework Agreement and Contract type provides for Project Management, QS and quality control within the contractor working to the client; this approach enables the contractor to take all the risk 2. Change controls mechanisms have been clarified as being robust and the JCG will exercise its role in ensuring cost certainty at all times	Throughout the project	Mark Sheldon	
Reputation – if the project fails to be delivered there is a risk to both CBC and TCT, the reputation of both organisations in delivering partnership projects will be damaged	Mark Sheldon	17.11.17	4	3	12	Reduce	1. Through the JCG ensure that the project is delivered to time and budget through close monitoring and control 2. Ensure that strategic communications are handled sensitively being originated through the JCG	Throughout the project	Mark Sheldon	

The risk			Original risk score (impact x likelihood)			Managing risk				
Risk description	Risk Owner	Date raised	Impact 1-5	Likelihood 1-6	Score	Control	Action	Deadline	Responsible officer	Transferred to risk register
Customer Satisfaction – if the project disrupts service delivery at Leisure-at and customers are not informed, or their normal routines in using the venue are disrupted, then there is a risk that Leisure-at relationship with customers will deteriorate	Julie Finch	17.11.17	2	3	6	Reduce	1. TCT will ensure that customers will be informed of operational impacts and adjustments will be communicated to ensure that the customer satisfaction is not impaired	Throughout the project	Julie Finch	
Performance – if the project fails to deliver the levels of performance set out in the business plan, then the underpinning costs and income analysis will be eroded and the project will not deliver the impacts as set out	Julie Finch	17.11.17	3	3	9	Reduce	1. TCT will ensure that the performance set out in the business plan will have the desired impact for customers and income levels. The Business Plan forms part of TCT's financial strategy for 18/19 as a priority. TCT will report to CBC on progress year on year	Throughout the project	Julie Finch	
Governance – if the Joint Commissioning Group fails to ensure that the project is delivered on time and to budget, the project governance will not have been effective	Mark Sheldon	17.11.17	3	3	9	Reduce	1. The JCG will ensure that the project milestones are effectively reported to the relevant scrutiny committees to ensure tight control on progress, quality and the final outcome	Throughout the project	Mark Sheldon	
Employee – if key staff change during the project's timeframes for delivery the project could be undermined and may be affected in terms of cost and timing	Mark Sheldon	17.11.17	2	3	6	Reduce	1. Both CBC and TCT will ensure that the information on the project is stored transparently, and that the transfer of knowledge is transparent. Any key changes in staff before May 2018 will be supported by Managers within TCT who are informed during the project.	Throughout the project	Mark Sheldon	
Business Continuity – if the project is not planned properly this could affect business continuity	Julie Finch	17.11.17	3	3	9	Reduce	1. A full logistics plan will align with the fully detailed build plan once the contract is approved by CBC and detail is agreed	Throughout the project	Julie Finch	
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										

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