
Gloucester, Cheltenham & Tewkesbury



Pre-Submission Draft Joint Core Strategy

Sustainability (Integrated) Appraisal Report Non Technical Summary

March 2014

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Gloucester, Cheltenham & Tewkesbury Draft Joint Core Strategy

Integrated Appraisal incorporating Strategic Environmental Assessment, Habitats Regulations Assessment, Health and Equality Impact Assessment

Sustainability Appraisal Report: Non Technical Summary

for and on behalf of Enfusion Ltd

<i>date:</i>	<i>March 2014</i>	
<i>prepared by:</i>	<i>Barbara Carroll Toney Hallahan Sam Langford-Holt Alastair Peattie</i>	
<i>checked by:</i>	<i>Barbara Carroll</i>	

enfusion

environmental planning and management for sustainability



Treenwood House
Rowden Lane
Bradford on Avon
BA15 2AU
t: 01225 867112
www.enfusion.co.uk

Gloucester, Cheltenham & Tewkesbury Pre-Submission Draft Joint Core Strategy: Sustainability Appraisal (SA) Report

Non-Technical Summary (NTS)

This is the NTS of the Sustainability Appraisal Report

1. This is the Non-Technical Summary of the Sustainability Appraisal Report documenting the processes of Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) within an Integrated Appraisal for the Gloucester, Cheltenham and Tewkesbury (GCT) Joint Core Strategy (JCS). This summary is an integral part of the Sustainability Report that accompanies the Pre-Submission Draft JCS for public consultation in 2014. It provides an outline of the SA process and findings, including how the SA has influenced the development of the plan, and in accordance with the requirements of the National Planning Policy Framework, the European SEA Directive and UK guidance on SA/SEA.

The Gloucester Cheltenham & Tewkesbury Joint Core Strategy

2. The purpose of the JCS is to bring together the strategic development management planning policies and strategic allocations for housing and employment development into one coordinated plan for the three administrative areas of Gloucester City, Cheltenham Borough and Tewkesbury Borough Councils. The JCS is the spatial expression of the vision and strategic objectives for the area and sets out how it will develop during the period up to the year 2031. The JCS provides the strategic direction and planning framework for development in the wider JCS area; each Council will prepare a District Plan for local development in its own area – and these will be consistent with the policies in the higher level JCS.
3. The JCS has been prepared in accordance with national planning requirements and informed by various technical studies, the SA, and the responses to consultation with the public, stakeholders and the regulators. The objectives of the JCS are aligned with the community ambitions in the 3 local authorities' adopted Sustainable Community Strategies that set out the long-term ambitions for the communities. The JCS sets out the key challenges for the JCS area and a Vision for the development of the area until 2031. This is followed by Strategic Objectives to deliver the Vision for the area and these have been grouped under the headline aims of the 3 Sustainable Community Strategies:
 - **A thriving economy:** Building a strong and competitive urban economy; Ensuring the vitality of Town centres; Supporting a prosperous rural economy.

- **A sustainable natural and built environment:** Conserving and enhancing the environment; Delivering excellent design in new developments; Meeting the challenge of climate change.
 - **A healthy, safe and inclusive community:** Promoting sustainable transport; Delivering a wide choice of quality homes; Promoting healthy communities.
4. The Pre-Submission Draft JCS contains 2 strategic policies on the scale and distribution of new development; 15 sustainable development policies; 8 infrastructure policies; and one strategic allocations policy that sets out requirements and provides area boundaries with indicative site layouts for 9 strategic allocations. The JCS also includes proposals for monitoring and review.

SA and Integrated Appraisal: Strategic Environmental Assessment (SEA), Habitats Regulations Assessment (HRA), Equality Impact Assessment (including Health EqIA)

5. 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 Development Plans. This requirement for SA is in accordance with planning legislation¹ and paragraph 165 of the National Planning Policy Framework. 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. For the SA of the JCS, an integrated process has been undertaken that also addresses health and equality issues⁶ alongside the requirements of the Habitats Directive⁷. The Councils commissioned independent specialist consultants Enfusion to progress the appraisal work in May 2012.
6. 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 SEA⁸. Initially the scope of the SA is determined by establishing the baseline conditions and context of the JCS area by considering other relevant plans and objectives, and by identifying issues, problems and opportunities for the area. From this the scope of the SA is

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 To demonstrate compliance with the Equality Act, 2010

⁷ EU Directive 1992/43/EEC (and see also NPPF paragraphs 14 & 117)

⁸ ODPM A Practical Guide to the SEA Directive 2005

prepared and includes an SA Framework of objectives for sustainable development in the JCS area and which forms the basis against which the JCS is assessed.

Sustainability characteristics of the JCS area and likely evolution without the JCS

7. Baseline information about the JCS area has been collected and updated since the onset of the plan-making and SA processes. Relevant and sufficient information on the present and future state of the area has been collected in order to adequately predict the potential effects of implementing the JCS on the area. Baseline analysis provides the basis for making judgments about how the emerging content of the JCS might hinder or progress objectives for sustainable development.
8. **Communities & Housing:** The population in the JCS area has been gradually increasing for some years and is predicted to continue increasing. Following a similar trend to other Local Authorities in England, the proportion of the population under 15 years of age has been decreasing and the number of people over 65 has been increasing – and this is predicted to continue. Since the onset of the economic recession, numbers of housing completions have reduced in the JCS area. Between 2007 and 2011 there was a decrease in the number of affordable homes constructed in the area. Without the JCS providing the planning framework for housing development up to 2031, the trend in a shortage of homes would continue, issues of affordability could increase, and housing might not be located in most sustainable areas or where it is most needed (close to employment, sustainable transport, facilities and services).
9. **Economy, Employment & Education:** The percentage of the working population that is actively working has decreased since 2007 and the recession. However, despite the reduction, the unemployment rate for the area is still below the national average. Most employment in the JCS area is focused on public administration and the education, health, distribution, hotel/restaurants, banking/finance and insurance sectors, with some manufacturing. Cheltenham and Tewkesbury are well above the regional and national averages for those with NVQ4 or higher levels of education. Without the JCS employment may not be located where it is most needed or in the most sustainable locations; it would lead to a constraint on economic performance for the JCS area. The potential for uncoordinated retail development could have negative effects on the vitality and viability of town centres.
10. **Health & Equalities:** The health of people in the JCS area varies compared with the national average, although overall it is good and the percentage of the population with long-term limiting illness or disability is less than the national average. Cheltenham has lower levels of deprivation, higher life expectancy and lower levels of childhood obesity than the national average. The most common forms of deprivation in Gloucestershire relate to barriers to housing and services, crime and access to the natural environment. Without the JCS there

could be sporadic development resulting in less efficient delivery of health and social services. Enhancements in green infrastructure and accessibility to green space, which is known to have beneficial effects on health, would be less and not coordinated.

11. **Transport & Accessibility:** The JCS area has excellent transport links being well served with rail and road connections, and Gloucestershire Airport. The majority of residents work within the area but there is also a high level of inward commuting from outside the JCS area, and private vehicle use places a strain on the urban areas in terms of traffic congestion and pollution. The rural areas have a high level of car dependency for commuting and access to services. Without the JCS there is less likely to be any coordinated delivery of improvements to the transport infrastructure with negative effects likely on traffic and pollution.
12. **Water & Flooding:** The River Severn flows through the JCS area to the west of Tewkesbury and Gloucester and the JCS area lies within the Severn River Basin which is managed by the Environment Agency. Although there is a variety of good and poor quality water in the area, the Agency estimates that by 2015 there will be improvements. There is a shortfall in the supply/demand balance up to 2035 for the Severn Water Resource Zone and in the longer-term there will be a need for more water resources and treatment capacity.
13. Flood risk is a particular issue for the JCS area, especially for Tewkesbury and the west of Gloucester, with flood zones along the Rivers Severn and Avon and their tributaries influencing much of the pattern of development of the area. Given the lowland setting of the JCS area, an increase in flood extent is to be expected with climate change and flood waters might also be deeper, such that the flood hazard is likely to increase over time. Without the JCS there would be greater pressure on water resources and quality, and potentially increased flood risk.
14. **Energy & Climate Change:** Between 2005 and 2009 carbon dioxide emissions per person reduced across the JCS area reflecting a national decrease. The urban areas of Gloucester and Cheltenham are well below the national average whilst that for Tewkesbury is higher and this is due to higher emissions from industry and road transport. Gloucestershire has less installed renewable energy capacity than other counties in South West England. As a result of climate change, the JCS area (in common with much of England) is likely to see warmer and drier summers with milder and wetter winters. The frequency of extreme weather events is also likely to increase. Without the JCS, adaptation and mitigation of the effects of climate change will be less.
15. **Landscape & Cultural Heritage:** The rural landscape of the JCS includes the Cotswold Area of Outstanding Natural Beauty, present in both the Cheltenham and Tewkesbury Local Authority areas. The landscape around the three principal settlements is varied, often attractive and can be sensitive to change. There is a substantial number of heritage assets in the JCS area including Gloucester's

Roman remains, cathedral, canal and docks; the Regency architecture and spa origins of Cheltenham; and Tewkesbury's medieval abbey, architecture and waterways. Without the JCS future development is likely to have greater adverse effects on landscape and the settings of historic assets.

16. **Biodiversity:** There are a number important sites designated for nature conservation within the JCS area, including 2 European designated sites at Dixon Woods and Cotswolds Beechwoods, and 21 SSSIs and 10 Local Nature Reserves. Although the international and nationally designated sites are protected by legislation, without the JCS there will be less protection for locally important biodiversity and less likelihood for enhancements to green infrastructure with its benefits for both people and wildlife.
17. **Air Quality:** Within the JCS area the National Air Quality Objective for Nitrogen Dioxide is being exceeded in 5 areas – these Air Quality Management Areas are generally in locations that have congested or slow-moving traffic. Without the JCS it is likely that there would be a less coordinated approach between development and transport infrastructure with potential for greater negative effects on air quality.
18. **Waste, Minerals & Soils:** The amount of solid waste being produced and sent to landfill has been decreasing in recent years, and the average waste recycled in the county is around 41%. The decrease in production of building stone is likely to relate to the reduced economic activity in the UK generally. Greenfield land plays an important role in protecting the landscape setting and character of each urban area; protection of agricultural land is increasing in importance with concern over security of food production. Development is likely to increase waste generated as well as minerals and land required; this is likely to be more significant if not coordinated through the planning and design of development in the JCS.

Key Sustainability Issues, Problems and Opportunities

19. Plans and programmes that could affect the JCS were reviewed and considered together with information collected relevant to the characteristics of Gloucester, Cheltenham and Tewkesbury. From these studies the key sustainability issues and opportunities for the JCS were identified as follows:
 - Rich heritage assets; land designated as AONB and Green Belt very important in protecting unique setting and landscape character; and significant risks from flooding especially with changing climate;
 - Town centre hierarchy; Cheltenham the dominant retail centre; need to ensure provision of future employment land; educational attainment; difference in salary with pay in Gloucester less; car ownership lower in the rural areas of Tewkesbury;

- Population growth and changes to the pattern of household formation; fewer affordable houses available; variations in deprivation, equality, education and health across area; the need to encourage a move away from transport using the private car.

20. The baseline and review of other plans was updated in 2013 and 2014 so that the basis for assessment remained current. This also demonstrated that the sustainability issues are still relevant and that the methods of assessment remain applicable.

How has the JCS been assessed?

21. An SA Framework was compiled and included SA Objectives that aim to resolve the issues and problems identified for development planning in the JCS area. This SA Framework, together with the baseline information, comprised the basis for assessment, and is summarised in the following table:

No.	Sustainability Objective
1.	Safeguard & enhance biodiversity & improve connectivity between green spaces & functional habitats
2.	Reduce contribution to climate change & support households & businesses in reducing their carbon footprint
3.	Adapt to the consequences of climate change
4.	Manage & reduce flood risk & surface water run-off
5.	Protect & improve the quality of natural resources including soil, water & landscape
6.	Minimise the use of natural resources including soil, water & greenfield through good design
7.	Protect & enhance the area's distinctive historic environment
8.	Improve accessibility, maximise the use of sustainable modes of transport & reduce the need to travel by the private car
9.	Minimise pollution and waste to landfill
10.	Ensure the availability of employment land & premises to encourage inward investment & support growth of existing businesses
11.	Support the vitality & viability of city & town centres as retain, service, leisure & learning destinations
12.	Reduce inequalities in wellbeing & opportunity
13.	Reduce crime & the fear of crime
14.	Improve access to health facilities & promote healthy lifestyles
15.	Ensure everyone has access to a decent home that they can afford & meets their needs
16.	Create, enhance, protect, connect & improve access to open spaces
17.	Improve access to education & life-long learning & enhance skills
18.	Protect & enhance cultural heritage & promote tourism

22. Each emerging part of the JCS, including options for distributing housing, employment and infrastructure, potential strategic allocations, and policies to control proposed development, was subject to SA. Using the SA Framework, the baseline information and professional opinion, the likely effects of the emerging JCS were assessed. The SA 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
x	Absolute constraints	Absolute sustainability constraints to development, for example, internationally protected biodiversity
--	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

23. 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 a strategic 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/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?

24. Throughout the development of the JCS, alternatives have been considered and appraised through the SA process in an iterative and ongoing way such that the findings of the SA have informed plan-making. In 2009, the early preparation of plan-making considered Issues and Key Questions and the consultation process invited consideration of the SA Objectives relevant to specific issues and questions. During 2010-2011 and Developing the JCS Preferred Option, 3 options for the spatial strategy and a number of options for potential strategic

allocations and broad locations for potential housing and employment land were investigated through plan-making and subject to SA.

25. A spatial strategy option based on achieving stronger communities was not taken forward as the emphasis on affordable housing and community facilities would be likely to affect viability. A spatial strategy option based on addressing climate change was not taken forward as there were likely to be major negative effects on landscape and biodiversity from fewer larger development sites. A spatial strategy based on achieving economic resilience (together with elements from the other 2 options) was progressed as this provides the greatest opportunities for all in the JCS area; concentrating development in the urban centres reduces negative effects on the wider environment and maximises economic performance.
26. Taking the preferred strategic approach of an urban focus and extensions to the three centres, further studies identified Broad Locations around the edges for Gloucester city, Cheltenham town and Tewkesbury town. These were subject to initial SA (green, amber, red) and the findings informed the choice of those options to take forward. The principal constraints included landscape and historic constraints, risk of flooding, potential patterns of development, and the Green Belt constraint, indicating a limited number of development possibilities.
27. During 2012 and 2013 with the preparation of the Draft JCS and using updated evidence including development need, the strategic approach for development was subject to fresh SA and 3 options were considered – urban focus; rural dispersal; significant expansion/new settlement. Overall, the strategic option for distributing development through an urban focus has the most positive effects and more certainty, and has therefore been progressed for the JCS. The strategic option for rural dispersal has many negative and uncertain effects; it is unlikely to be able to provide the range and need of housing and therefore cannot progress sustainable development. It is unlikely that a major expansion or new settlement could be viable or deliverable within the timescale of the JCS; therefore not realistic or sustainable for development.
28. For the Draft JCS 2013 15 areas for strategic allocations, each with a range of options for quantity and type of development, were investigated and subject to SA. The options progressed were those that had the least negative effects on environmental factors with the most positive effects for socio-economic factors, including being in line with the overall strategy and being able to be delivered in the lifetime of the JCS.
29. In 2014, further studies identified that the objectively assessed need for housing was about 30,500 new homes, a significant reduction from the figure of around 33,200 new homes that was investigated in 2013 in the Draft JCS. This new figure was investigated together with 2 other housing scenarios for 33,200 and 30,900 new homes in a comparative SA. However, at this high level strategic SA did not identify any major differences between the 3 scenarios.

What are the likely significant effects of the JCS?

30. In March 2014, the changes made to the Draft JCS as a result of consultation and updated evidence were screened for significance with regard to the SA process. The changes to policies mostly removed uncertainty that had been identified in the earlier SA and strengthened positive effects. The overall reduction in housing numbers has a cumulative effect of reducing the negative effects on environmental quality from the quantum of new development proposed.
- 31 Overall, the implementation of the policies presented in the Pre-Submission Draft JCS were found to have significant positive sustainability benefits, reflecting the iterative and ongoing inputs from the SA, the wider evidence base, and comments received from public consultations on draft proposals. The key positive effects are summarised in the following table:

Likely Significant positive effects of the Pre-submission Draft JCS	
Relevant SA Objective	Positive Effects
Economy City & Town Centres Sustainable Communities Health Education & Skills	The JCS supports significant additional jobs in Policy SD2 with major positive effects for a range of employment opportunities focused on the urban areas with cumulative positive effects; appropriate size and scale for the rural areas. Support for economic development will have further positive effects for health and wellbeing, as well as education and skills – all contributing to more sustainable communities. The vitality and viability of existing city and town centres will also be maintained.
Climate Change Flooding Health	Flooding is a particular issue for the JCS area and Policy INF3 controls any increase in flood risk with positive effects – directly and cumulatively with regard to flooding and health risk. Renewable/low carbon energy is permitted if no adverse effects locally and this will have cumulative positive effects in the longer term.
Climate Change Natural Environment Sustainable Communities Biodiversity Green Space	The JCS sets out a strong focus on sustainable design requirements. Policies SD4 and 5 on design and construction require sustainable standards that should have positive effects overall on climate change, energy efficiencies, and includes encouragement for multi-functional benefits of green infrastructure for people and wildlife.
Biodiversity Natural Environment	Green Belt, landscape and historic assets are particular issues for the JCS and Policies SD 6-9 will

Historic Environment Waste and Pollution Health Green Space	limit negative effects and provide for enhancement possibilities. The JCS has a strong commitment to Green Infrastructure in INF4 with major positive cumulative effects in the long term on many sustainability factors including biodiversity and human health.
Sustainable Communities Housing Economy Health Transport	Major long term and cumulative positive effects through meeting the housing needs of the JCS area which will also support economic objectives; Policies SD11-14 provide for a range of housing for different needs and to reflect the changing population; ensuring that community facilities will be provided with both short and long term positive effects. Provision of good quality housing will have major direct cumulative positive effects on health, supported by Policy SD15 supporting healthy lifestyles and INF1 promoting sustainable transport.

32. Alongside the positive effects, some 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, relating to the strategic allocations proposed. The key negative effects are summarised in the following table:

Likely Significant Negative Effects of the Pre-Submission Draft JCS	
Relevant SA Objective	Negative Effects
Climate Change Natural Environment Transport Waste & Pollution	Increased contributions to greenhouse gases are likely given the overall amount of new development proposed and arising from transport and also the embodied energy inherent in construction (housing and employment) allocations.
Health Waste & Pollution Transport	Potential negative effects including noise, air quality reduction, pollution, congestion, loss of tranquility arising from the overall predicted growth in road based traffic. Implications for human health from increased pollution levels.
Natural Environment Biodiversity Green Space	Potential negative effects arising from significant physical changes to local areas; effects on landscape and indirect effects for biodiversity, where local level habitats and linkages disturbed or removed – cumulative in the longer term.

How could negative effects be mitigated and positive effects enhanced?

33. A key function of the SA and overall Integrated Appraisal process is to provide advice and recommendations to the development of the plan in order to mitigate identified negative effects and enhance positive effects. At each stage, these recommendations are taken forward into the stage of the plan making process, and included in lower level planning documents if relevant.
34. The proposed Policies and Strategic Allocations presented in the Pre-Submission Draft JCS reflect recommendations arising from all the previous SA work undertaken to support the plan development stages, and the Councils are commended for their effective and thorough integration of key sustainability themes and requirements throughout the progression of the JCS. In particular, the findings of the SA guided the selection of proposed strategic allocations by avoiding locations that might have significant negative effects, for example on internationally protected biodiversity. Thus negative effects have been mitigated through avoidance and by locating the strategic allocations with an urban focus.
35. Potential negative effects have been mitigated through strong policies that protect the natural environment and promote sustainable communities through requirements for appropriate provision and phasing of supporting infrastructure, such as community centres and transport. A strong feature of the JCS is the commitment to Green Infrastructure, recognising the many benefits it can provide, including managing flood risk, enhancing biodiversity, and providing recreational and tranquil spaces for people. Potential negative effects on local biodiversity will be mitigated through the requirement to conserve and improve biodiversity in new development, wherever possible – and to be considered within a wider strategic approach to green infrastructure which will have cumulative positive effects in the long term.

Consultation

36. The emerging drafts of the JCS and its accompanying SA documents have been subject to statutory consultation at the scoping stage with the statutory bodies (English Heritage, Environment Agency, and Natural England) and wider consultation with stakeholders and the public. The SA accompanying each stage of plan-making since 2009 has been subject to public consultation through provision of the documents on the Councils' JCS website. Comments made and responses to these comments have been recorded and also made available. Thus consultation has been a vital ongoing and iterative element of the plan-making and the SA processes. The Pre-Submission Draft JCS and the SA Report reflect the findings of various technical studies and the responses received during consultation.

Monitoring proposals

37. Local planning authorities are required to produce Monitoring Reports (MRs) including indicators and targets against which the progress of the Plan can be assessed. There is also a requirement to monitor the predictions made in the SA and Government advises Councils to prepare a monitoring strategy that incorporates the needs of the two processes to make best use of shared information and resources. Monitoring proposals were suggested in the early SA scoping stage and will be progressed, including consultation, as the JCS progresses. The JCS Authorities will prepare a monitoring strategy that will include consideration of any specific requirements from the SA process.

Summary and Next Steps

38. The Sustainability Appraisal of the Pre-Submission Draft JCS has appraised the effects of the individual policies and strategic allocations as well as the overall effects of the plan, including cumulative effects. The Appraisal has identified that the proposed JCS will contribute to dealing with identified sustainability issues in the area, with major positive effects particularly for communities through the allocation of a range of new housing and employment land, together with improvements to Green Infrastructure and transport links. The key negative effects relate to the cumulative effects arising from amount of development growth, particularly traffic growth with some negative effects for emissions, climate change and wider health objectives. Overall, the policies and proposed locations provide a strong positive framework to guide sustainable development in the JCS area up to 2031.
39. The consultation responses received on the Pre-Submission Draft JCS and this Sustainability Appraisal Report will be used to inform the preparation of the JCS submission document scheduled for completion in 2014. Any significant changes to the policies or strategic allocations proposed in the JCS will be subject to further appraisal as necessary and a revised SA Report will be published alongside the JCS Submission Document.
40. The SA Report is available for review and comments alongside the Pre-Submission Draft JCS document for a 6 week period during Summer 2014. The documents are available to download from the JCS website at www.gct-jcs.org and at 'deposit locations' across the area, as set out in the Consultation Statement. Responses should be made using the questionnaire, an online version of which can be downloaded from the JCS website. Hard copies are also available at the deposit locations, and should be returned to the following address:

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