

## JCS Briefing Note – Submission status and Process Clarification 11 November 2014

### Background

Since 2008 there has been ongoing engagement with stakeholders on the emerging JCS as summarised below.

- Evidence gathering stage (2008 to 2009);
- Issues and Key Questions Consultation (November 2009 to February 2010);
- Developing the Spatial Options Consultation (June to July 2010);
- Part 1 Informal Consultation (June to August 2010);
- Developing the Preferred Option Consultation (December 2011 to February 2012);
- Gypsy, Traveller and Travelling Showpeople “call for sites” (August to October 2013);
- Draft Joint Core Strategy consultation (October to December 2013); and
- Pre-Submission JCS publication (June to August 2014).

In April 2014 the JCS authorities agreed the Pre Submission JCS for consultation, at each Council meeting, members also agreed the process for the Submission JCS which was as follows;

Delegates authority to the Chief Executives in Cheltenham and Tewkesbury and the Corporate Director of Services and Neighbourhoods for Gloucester City Council in consultation with the relevant Lead Members to make any necessary minor amendments including the identification of any saved plan policies as considered appropriate by the three JCS Councils prior to:

- i. publication of the Pre Submission JCS and
- ii. submission of the JCS to the Secretary of State for independent examination.

This assumed that if any response to the consultation or any other subsequent new evidence required a significant change to the JCS this would come back to further meetings of the 3 Councils. Should any significant change be required post submission (to maintain or re-achieve soundness) in response to new evidence emerging, then this will result in the need for further public consultation and suspension of the examination of the JCS.

### Changes to the JCS

All representations submitted in response to the publication of the Pre Submission JCS have been reviewed. Whilst there remain some outstanding objections from stakeholders these do not raise issues which have not been dealt with through consultation and the evidence base of the plan. Many of these objections have been raised at earlier stages and so have already been considered in detail. In these cases it is right that the evidence is weighed by the inspector and therefore objections taken forward to an examination in public. Examples include challenges to the Objectively Assessed Need, changes to the Green Belt and level of employment land allocated within the plan.

The only resulting changes proposed to the JCS are therefore of a minor nature. Examples include clarifications to supporting text where this assists in clarifying the meaning of a policy statement, or added examples to assist the use of the policy in future.

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One part of the evidence base required careful consideration following the publication of the Pre Submission JCS – this was the population projections following the release of ONS 2012 data. This was reviewed by the JCS retained consultants (Cambridge Centre for Housing and Planning Research - CCHPR). CCHPR are of the opinion that the OAN within the JCS is sufficient to support the updated ONS data, falls within normal confidence margins and advised not to make changes to the JCS. This was discussed by Cross Boundary Programme Board (CBPB) and Member Steering Group (MSG) and the advice given was supported.

Consequently overall numbers within the JCS haven't changed; small changes have been made to tables SP2 and SA1 to reflect updated developer information. (MOD Ashchurch has increased housing capacity by 100 units to the end of the plan period) NW Cheltenham total build out stays the same, but more units in the revised proposed scheme will be in the Cheltenham area).

In line with the resolution made by Councils in April 2014, since only minor changes are proposed, the JCS will be formally submitted to the Secretary of State on 20<sup>th</sup> November 2014.

In preparing for the submission the JCS CBPB and MSG have advised and been updated on the submissions made during the JCS Pre Submission publication as follows;

- CBPB; 28 August 2014 – Update on representations received and discussion on issues arising.
- CBPB; 24 September 2014 – Review of representations received, discussion on issues arising and recommendation to MSG that only minor changes are made to the JCS Submission
- MSG; 24 September 2014 – Overview of representations received and discussion on issues arising. Consideration of interim version consultation report and clear steer to officers on changes to be made to the report.
- CBPB; 23 October 2014 – Review of minor changes. Update on transport modelling.
- MSG; 6 November 2014 – Overview of minor changes. Update on consultation report. Detailed presentation and discussion on transport modelling.

All representations submitted in response to the publication of the JCS Pre Submission are available to view online via the following link <http://www.gct-jcs.org/PublicConsultation/Home.aspx>. Upon submission the JCS will be accompanied by a consultation report in accordance with the Town and Country Planning Regulations (2012). This consultation report has been informed by discussion with CBPB and MSG.

### Further evidence

The submission of the JCS to the Secretary of State represents a point in time. After submission information will continue to come forward. Any new or updated information will need to be made available to the Inspector, together with a detailed response by the Councils on how such information affects the JCS as submitted. This process is not unusual to examinations. Further evidence expected includes;

- **JCS transport modelling** – the conclusions of the transport modelling – strategic allocation option testing has been reported to CBPB and MSG. The outputs of this work are informing an ongoing conversation with both the Highways Authority and

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Highways Agency to confirm the proposed transport strategy. A summary report is currently being drafted and this together with the full report will be published to support the examination. The full report will be available on the JCS web-site by 15 November, with the Summary Report available early December

- **JCS viability assessment** – an interim viability report on smaller developments is available via the JCS website <http://www.gct-jcs.org/EvidenceBase/>. In terms of the strategic sites and further sensitivity testing, there are inter-relationships between the viability assessment and the work commissioned to inform the consideration of the Community Infrastructure Levy. This second stage of this work is being finalised now and will be published In December 2014 to support the examination.
- **Community Infrastructure Levy** – Consultants Peter Brett Associates are working with all JCS councils on the consideration of a Community Infrastructure Levy. The key first stage of this work is proposal of a Preliminary Draft Charging Schedule which is scheduled for early 2015. Based upon approval of this via the three partners will be to consult publically on this schedule.
- **DCLG household projections** – expected by the end of the year
- **Updated Strategic Housing Market Assessment** – expected by the end of the year following work to align methodologies on Objectively Assessed Need
- **Cheltenham Local Green Space Assessment** – sites submitted for consideration by the end of the year and used to inform the preparation of the Cheltenham Plan.

**Key steps**

Once the JCS is submitted to the Secretary of State an independent Inspector will be appointed to oversee an examination in public. It is anticipated that an examination will be held spring 2015 with an Inspectors report published autumn 2015. Once the JCS councils are in receipt of the Inspectors report any recommendations will be debated by councils, considering any changes needed to the plan prior to adoption.