

Page of the June 2014 Pre Sub JCS	Para/Ref	Existing Text/Map	Amended text/Map	Explanation of changes if applicable
all			Either include all NPPF paras or delete all NPPF para references	we should consistently either use NPPF para numbers or just refer to NPPF
all			Use "dwellings" or "houses" or "accommodation" as appropriate. The only exception to this should be where "home" is part of a phrase, e.g., nursing home or Home for Life.	it would add consistency and reduce confusion.
all			Update to Submission Version - this has involved a number of alterations to update to the Submission version and relevant information/dates etc.	Updated
None (after 160)	Appendix 1 - Cross Reference Table	PART 3 – STRATEGIC POLICIES	PART 3 – SPATIAL POLICIES	as above, ensuring that all policies are considered as strategic.
iii	index	Part 3 - Strategic Policies Part 4 - Sustainable Development Policies, Polciy SP1 Scale of New Development	Part 3 - Spatial Policies , Policy SP1 - The Need for New Development	Might be read to imply that only part 3 policies are strategic, but this applies to all policies. This means changing the names of part 3 policies to 'Spatial Policies' and additional changes below including SP1 name change to 'Need for'
iv	index	Part 3 - Strategic Policies	Part 3 - Spatial Policies	as above, ensuring that all policies are considered as strategic.
vii	"what has changed" section	Strategic Policies: SP1 and SP2	Spatial Policies: SP1 and SP2	as above, ensuring that all policies are considered as strategic.
4	1.6	...it must be in general conformity with strategic policies in the development plan. Whilst neighbourhood plans...	...it must be in general conformity with strategic policies in the development plan. All policies in the JCS are to be considered strategic and are relevant to development of all scales and types unless otherwise specified within the policy. Whilst neighbourhood plans...	as above, ensuring that all policies are considered as strategic.

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11	"Structure of this document"	Part 3 contains the strategic policies for the JCS area, setting out the overall amount and distribution of new development together with delivery policies. Part 4 presents a suite of sustainable development policies relating to the entire JCS area.	Part 3 contains strategic spatial policies for the JCS area, setting out the overall amount and distribution of new development together with delivery policies. Part 4 presents a suite of strategic sustainable development policies relating to the entire JCS area.	as above, ensuring that all policies are considered as strategic.

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17	2.24 - 2.30	(after current 2.29 but before current 2.30 - will have to renumber)	<p>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 around Cheltenham and Gloucester 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. While early consultations examined the possibility of focussing development solely on urban areas this was predicted to have 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 development 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 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.</p>	<p>List of key challenges (pg 17) should be amended to make specific reference to the challenge of reviewing the GB boundary &amp; releasing land for development.</p>

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17	2.26	Numbers delivered	Updated	To reflect latest status on historical delivery
18	2.29	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 local cycling and pedestrian links.	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.	Highlights the role of public transport in offering alternative modes of transport to the private car. Previously public transport was not given the same weight in the text as cycling and walking in this paragraph.
22	SO7	Slight reword of some of the bullets of Strategic Objective 7	<p>Reduce the need to travel and reliance on the car by:</p> <ul style="list-style-type: none"> <li>- Improving opportunities for public transport, walking and cycling by making routes more convenient, safe and attractive</li> <li>- Improving existing and providing new frequent public transport links and safe walking and cycling routes in all new development</li> <li>- 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.</li> <li>- Promoting bus priority on key public transport corridors identified in the Local Transport Plan throughout the JCS area.</li> </ul>	To ensure that the role of public transport, local bus services and the Local Transport Plan are fully acknowledged in the strategic objective.

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23	SO9 3rd bullet point	In partnership with others, encouraging healthy lifestyles and a well society through access to key community facilities and services, open spaces and sustainable transport	In partnership with others, encouraging healthy lifestyles and a well society through access to key community facilities and services, open spaces and sustainable transport, including public transport	Ensures that use of public transport is acknowledged as contributing to a healthy lifestyle
24	part 3	PART 3 - Strategic Policies	PART 3 - -Spatial Policies	as above, ensuring that all policies are considered as strategic.
29	SP2 wording (6)	In the remainder of the rural area, Policy SD11 will apply.	in the remainder of the rural areas Policy SD11 will apply to residential development and policy SD2 to employment related development.	Clarification, SD11 only applies to residential development
29	SP2 wording	3. This will be met:	Delete the number (3) and indent and unbold the text "this will be met" and the following 2 bullet points	To show that clause 3 is linked to bullet point 3 of clause 2.
29	SP2 numbers - distribution of development	Gloucester 11,943, Cheltenham 10,720, Tewkesbury 8,377	Gloucester 11,820, Cheltenham 10,655, Tewkesbury 8,565	This is an update based upon calculation of housing delivered as well as representations to numbers deliverable at strategic sites within the plan period. Note change to the overall delivery number is 2 dwellings or: 31,042.
30	3.2.8	62% of the identified need (18,856 homes)	for over 61% of the identified need (18,758 homes)	factual update

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31	3.2.10	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	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 included undertaking a sequential test for flood risk for each location in accordance with the NPPF. More information on this can be found in the Broad Locations and Strategic Allocations reports which form part of the JCS' evidence base.	To make it explicit that the Sequential test has been carried out in regard to the strategic allocations. Once finalised the SA should refer to this paragraph.
31	3.2.10		This included undertaking a sequential test for flood risk for each location in accordance with the NPPF. More information on this is can be found in the Broad Locations and Strategic Allocations reports which form part of the JCS Evidence Base.	As requested by EA representation
32	3.2.17	redrawing the Green Belt boundary to ensure that it would continue to deliver	...redrawing the Green Belt boundary whilst ensuring that it would continue to deliver....	Para 3.2.17. To improve the sense of the sentence, delete "to ensure" and insert "whilst ensuring".
34	SP2a		<i>various number updates</i>	Updates to the numbers delivered versus to be delivered. Note minimal change to the overall delivery quantum of +2 to 31,042
35	SP2b	A8 Ashchurch 2,125, total 12,184	A8 Ashchurch 2,225, Total 12,284	Update based upon developer representation

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40	4.2.7 SD2	4.2.7 Employment uses, such as retail, leisure facilities, education, health services and residential care (uses outside the 'B classes') are predicted to provide over two-thirds of the of the projected job growth across the area.	4.2.7 Employment uses, such as retail, leisure facilities, education, health services and residential care (uses outside the 'B classes') are predicted to provide a significant proportion of the projected job growth across the area, potentially two-thirds.	Paragraph 4.2.7 clarified with reference to % of B class employment.
43	SD3 wording (3)	provision will be made for the following new floor space requirements in the existing designated centres:	Provision will be made for approximately the following new floor space requirements in the existing designated centres:	Change SD3 to indicate that floor space requirements are broad forecasts and not an upper limit.
47	SD4 wording	In doing so, proposals (including changes to existing buildings) will be expected to achieve and, where viable, exceed applicable national standards.	In doing so, proposals (including changes to existing buildings) will be expected to achieve national standards. Where viable, the JCS authorities will encourage proposals to exceed these standards.	Requirement to exceed national standards may be unviable, corrected to avoid misinterpretation.
52	Policy SD5 iv	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.	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. <i>The contribution of public realm design, at all scales, to facilitating the preferential use of sustainable travel modes should be maximised.</i>	Highlighting the importance of public realm design in facilitating sustainable transport modes. .

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53	4.5.5	Good design can make the difference between a high-quality and successful development and a mediocre or unsuccessful one.	Good design, <i>including appropriate attention to detail</i> , typically makes the difference between a high quality and successful development and a mediocre or unsuccessful one.	Additional wording to explanation text, highlighting importance of detail in design
55	SD5b	Additions to existing wording of the bullet points in this section (note to editors, some are new, some additions to existing, check against current document text)	<p>Character - create focal points and places, that signal clear nodes for sustainable movement.</p> <p>Quality of the public realm - enrich space with well-designed details (e.g. paving, public art, lighting, signs, seats, railings, cycle parking, bus shelters and other street furniture)</p> <p>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.</p> <p>Durability - use materials that are fit for purpose, as well as attractive</p>	Addition wording for clarification add to bullet points to strengthen the facilitation of bus network and facilities.
57	Table 5d (ii)	No existing text	Demonstrate a consideration of heritage assets and their setting, assessing the effects of the proposed development and measures proposed to avoid substantial harm.	New bullet point under Table SD5d guidance regarding masterplans.



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57	SD5d	Additions to existing wording of the bullet points in this section (note to editors, some are new, some additions to existing, check against current document text)	<p>A masterplan which should:</p> <ul style="list-style-type: none"> <li>- Show a clear development structure and design concept, that facilitates and encourages all the delivery of all the amenities, services and behaviours needed to support sustainable lifestyles.</li> <li>- Contain well-considered strategic urban design principles that will be used to inform subsequent more detailed design, securely founded on good practice in terms of form, function and on-going management.</li> </ul>	Improvements to guidance for masterplans
58	(iii) design brief	High level of accessibility and good connections to public transport, community facilities and local services	High level of accessibility to community facilities and local services, including facilitating access to, and where appropriate efficient routing for high-quality public transport.	Improvements to guidance for design briefs
62	4.6.10	None	4.6.10 Gloucestershire Airport is a general aviation airport that handles 90,000 aircraft movement 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".	Accompanying text to reflect the SEP's wording about the airport
64	4.6.16	These amendments seek to provide a more appropriate Green Belt boundary and also to allow for limited development to take place.	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 5.	highlight that any development at these areas of GB release will take into account relevant policies for the protection of playing fields etc.

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71	Policy SD9 5.	Development at strategic allocations must have regard to the findings and recommendations of the JCS Historic Environment Assessment (or any subsequent revision).	Development at strategic allocations should 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 assessed.</i>	Addition text to policy point 5 to clarify the need to demonstrate the impacts of development on heritage assets and mitigation has been considered - in line with the Historic Environment Assessment.
75	SD10	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.	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. Ensuring that new development both within and outside such sites has no unacceptable adverse impacts.	Added wording to policy to highlight that development outside the boundary of designated sites should not have an unacceptable adverse impact on them.
78	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.	(add to this sentence) 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.	Added in sentence into delivery section of the supporting text to clarify that developments outside protected/designated sites should also not have an unacceptable adverse impact on them.
83	SD11 bullet 3	areas of Gloucester City, Cheltenham and Tewkesbury towns, service centres and service villages.	areas of cities, towns, service centres and service villages.	Correction

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99	INF1		<p>1. Developers should aim to provide safe and accessible connections to the transport network to enable travel choice for residents and commuters. All proposals should ensure that: i. the development provides safe vehicular access to the highway network ii. any increased level of car use derived from the development does not result in severe impact. Severe impact will be determined on a case by case basis, iii. any severe impacts that can be attributable to the development must be mitigated, iv. connections should be provided where appropriate to existing walking, cycling and passenger transport networks and should be designed to enable and encourage maximum potential use.</p>	<p>Policy INF1 is flawed in its definition of 'severe' &amp; the reference to 'highway junctions no longer operating within their design capacity'. Has been redrafted with consultation from stakeholders including Gloucestershire Highways.</p>
106	5.3.12	<p>Technical Guidance to the NPPF requires that, where necessary, the Exception Test... of that document</p>	<p>National Planning Policy Guidance requires that...in the Flood risk and Coastal Change section of that document</p>	<p>The Technical guidance to the NPPF has now been replaced by nPPG</p>

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109	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. This will require investment and 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]).	<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. 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 and investment (for example, a contribution towards the management of the Cotswolds Beechwoods Special Area of Conservation [SAC]).</p> <p>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 INF7.</p>	Added further wording to explanatory text to set out a commitment to work with stakeholders to understand more detailed management and mitigation packages. Also to recognise the pressure on green spaces from increased demand on use.
117	INF7	xi. Safety and security including emergency services	(add) xii Flood Risk Management Infrastructure	Supports the need for this infrastructure
120	5.8.3	Following a formal preparation process that includes independent public examination....	Following a formal preparation process that includes viability analysis of the plan as well as independent public examination....	to include the need for viability analysis
122	6.1.1	Strategic Policies SP1 and SP2 in Part 3	Spatial Policies SP1 and SP2 in Part 3	as above, ensuring that all policies are considered as strategic.

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145	Indicative Site Layouts	<p>The indicative site layouts have not yet been revised following draft JCS consultation.</p> <p>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.</p> <p>These layouts will not be included in policy and are intended only as guidance.</p>	<p>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. They are intended as guidance only and should not be regarded as policy . When drawing up masterplans full regard should be given to the JCS evidence base for these strategic sites and the constraints it identifies.</p>	<p>This text was mistakenly not updated from the draft JCS</p>