

**REPORT TO JCS COUNCILS- INSPECTOR'S INTERIM REPORT ON THE  
GLOUCESTER, CHELTENHAM AND TEWKESBURY JOINT CORE STRATEGY**

**1. Background**

- 1.1 The JCS was last considered by the Councils of all three JCS authorities at the Pre-Submission stage in April 2014. All three JCS authorities agreed to the JCS Pre-Submission version and this (with what the JCS team considered to be minor changes) was submitted to the Planning Inspectorate in November 2014. The Examination has however been based on the Pre-Submission version of the JCS as this was the version agreed by each of the Councils and subjected to public consultation.
- 1.2 The Inspector appointed by PINS is Ms Elizabeth C Ord.
- 1.3 The Examination into the JCS commenced in May 2015. There have been three stages of hearings to discuss all aspects of the JCS since May 2015, the most recent one, Stage 3 was held and completed in April 2016.
- 1.4 A Preliminary Findings Report (Exam 146) was received from the Inspector on 16 December 2015 where Ms Ord set out her Preliminary Findings on the some key JCS issues, including her views on the strategic allocations (SAs) and their suitability for inclusion in the spatial strategy. The purpose of this was to assist the JCS authorities with her direction of thinking at that early stage of the Examination having not yet heard all of the evidence. A JCS response to the Preliminary Findings was provided on 25 January 2016 (Exam 146A).
- 1.5 The Preliminary Findings reflected the positive aspects of the Examination, in that much has been achieved already by the JCS team towards a position of soundness and legal compliance. In particular the Inspector largely supported the JCS position on a number of areas including:
- The vision and objectives;
  - The duty to cooperate;
  - The principle of releasing Green Belt land for our growth needs;
  - The broad spatial strategy of focussing growth around the three main centres of Gloucester, Cheltenham and Tewkesbury town;
  - Support for most of the strategic allocations in the plan.
- 1.6 The main issues arising from the Preliminary Findings (and ongoing through the later hearings) were:
- The overall housing requirement and the Strategic Housing Market Assessment;
  - The employment and retail land needs and supply;
  - The need for growth to be rebalanced towards Tewkesbury and Gloucester;
  - That the Inspector was minded to find the North Churchdown strategic allocation unsound due to Green Belt sensitivity;

- Local Green Space requirements and landscape sensitivity at North West Cheltenham and Leckhampton strategic allocations including being minded to find the Farm Lane section (in Tewkesbury Borough) unsound;
- The appropriateness of Safeguarded Land at North West and West Cheltenham including stating that part of the West Cheltenham site might be suitable for strategic allocation;
- The appropriateness of the strategic allocation size threshold and the potential role of smaller sites in the JCS;
- New strategic allocations would therefore be needed to address these issues.

1.7 We have now received the Inspector's Interim Report (issued on 31 May 2016) which sets out her recommendations on the JCS following the three hearings stages. The Interim Report reflects a progression of the Inspector's earlier thoughts set out in the Preliminary Findings. The Interim Report will be reviewed by the Inspector as necessary prior to the release of the formal Final Report from the Inspector (currently timetabled for February 2017).

## **2. Inspector's Interim Report (included as Appendix 1)**

2.1 The Inspector's Interim Report provides a clear way forward towards the JCS being found sound and legally compliant.

2.2 Whilst the Interim Report focusses on recommendations to make the overall plan sound, a number of subject matters were discussed at the hearing sessions where the Inspector has not sought to make any further recommendations. Furthermore the Interim Report confirms the JCS approach in a number of areas including:

- The spatial strategy for future development
- The methodology in calculation the demographic OAHN;
- The approach to economic growth and employment land;
- The approach to retail growth
- The methodology for establishing the needs for Gypsies, Travellers and Travelling Showpeople;

2.3 Furthermore, at Paragraph 64, the Inspector states: "For the reasons set out in my Preliminary Findings I am minded to find that, with the exception of North Churchdown, the proposed strategic allocations are sound, subject to reductions in the extent of development at North West Cheltenham and Leckhampton ..."

2.4 Given these reductions and deletion and the Inspector's higher housing requirements (as set out below), the Interim Report therefore also recommends additional strategic allocations to help meet the JCS housing requirement.

2.5 The Inspector's Interim Report can be summarised as:

### **(A) Objectively Assessed Housing Need (OAHN)**

1. Increasing the Objectively Assessed Housing Need (OAHN) from 31,830 to 33,500 to provide an appropriate economically led figure for OAHN.

2. Greater clarity should be provided on the provision for older peoples housing and student housing within the OAHN.
3. The affordable housing need is confirmed as 638 units per annum across the JCS area.
4. An additional 5% 'policy uplift' to OAHN is recommended to assist affordable housing delivery and support the five year housing land supply, and so the total JCS housing requirement is 35,175 dwellings.
5. The Inspector calculates that this would result in a total housing requirement of 14,340 for Gloucester, 10,851 for Cheltenham and 9,983 for Tewkesbury.
6. Housing supply buffers - 20% buffer (for Tewkesbury and Cheltenham) and 5% buffer (for Gloucester) applied to the 5 year housing land supply.

**(B) Employment and Retail**

7. Accepting the revised approach to employment land including the new West Cheltenham strategic allocation and the total JCS B-class employment land supply of 192 hectares (including Borough and City capacity).
8. Whilst the short to medium term retail need is shown to be met by existing commitments and planned projects, an immediate review of JCS retail policy should be undertaken to address retail matters including the allocation of land for longer term retail need.
9. The inclusion of all the current city and town centre boundaries and retail frontages in the JCS for Gloucester, Cheltenham and Tewkesbury.
10. Accepting that the revised Gypsy and Traveller needs are no longer a strategic requirement for JCS allocation as needs can be met on smaller sites, subject to seeking financial contributions for Gypsy and Traveller sites from development proposals of more than 10 residential units.

**(C) Spatial Strategy**

11. The spatial strategy is considered to be sound subject to adhering to the principle of meeting the needs of Gloucester at / around Gloucester, Cheltenham at / around Cheltenham and Tewkesbury at / around Tewkesbury.

**(D) Apportionment, Green Belt and Sites**

12. Green Belt land should only be released for Gloucester and Cheltenham needs, but not for Tewkesbury's needs as there are other sustainable sites not in the Green Belt to meet Tewkesbury's needs.
13. The strategic allocations are considered to be sound with the exception of the whole of North Churchdown and parts of Leckhampton and North West Cheltenham.
14. North West Cheltenham strategic allocation is considered sound subject to a reduction in housing capacity of 500 units to provide a green buffer around Swindon village to reflect the landscape and historic sensitivities in the area.
15. Development at Leckhampton should be reduced in size significantly to around 200 dwellings within Cheltenham Borough to reflect the landscape and

- transport constraints in the area, and therefore removed as a JCS strategic allocation, and be considered for allocation in the Cheltenham Local Plan.
16. There is a need for additional strategic allocations to meet Gloucester's and Tewkesbury's unmet needs.
  17. Twigworth is recommended as an additional housing-led strategic allocation (for at least 750 dwellings) for Gloucester needs. The allocation could be increased if it can be demonstrated that more housing in this location is appropriate and deliverability is addressed.
  18. Winnycroft is recommended as a JCS strategic allocation for Gloucester needs (albeit not adding to the supply as this site was previously included within the urban capacity figure for Gloucester).
  19. Sites to the south of Gloucester (at Brookthorpe/Whaddon and Hardwicke in Stroud) would make an appropriate strategic allocation if needed, and subject to agreement with Stroud District Council. Therefore the Inspector recommends that Stroud District Council be approached.
  20. The addition of West Cheltenham (Phase 1) is supported as a strategic allocation for strategic employment purposes and approximately 500 dwellings.
  21. The Inspector's judgement is that exceptional circumstances exist for the removal of a number of smaller Green Belt sites in the North and North West of Cheltenham to assist with Cheltenham's five year housing land supply. This would mean the redrawing of the Green Belt boundary in the JCS and could allow these areas to be allocated through the Cheltenham Local Plan.
  22. Fiddington is recommended as an additional strategic allocation to meet Tewkesbury's needs.
  23. A site at Mitton in Wychavon District would make an appropriate strategic allocation if needed, and subject to agreement with Wychavon District Council. Therefore the Inspector recommends that Wychavon District Council be approached.

**(E) Reserve Sites, Local Green Space and Safeguarded Land**

24. The use of reserve sites is recommended to help provide for an ongoing five year housing land supply. The omission sites to the south of Gloucester and at Mitton could be used for this purpose, subject to the agreement of Stroud and Wychavon councils.
25. The case for Local Green Space (LGS) designation at North West Cheltenham and Leckhampton has been made out. As the Inspector is recommending the removal of Leckhampton as a strategic allocation, LGS will not be designated for this site in the JCS. For the LGS at North West Cheltenham at Swindon Village, the Inspector recommends an indicative area to be identified in the JCS. The designation of the LGS will come through the Cheltenham Plan.
26. The safeguarded land at NW Cheltenham is supported for longer term development needs, post 2031.
27. At West Cheltenham the safeguarded land (Phase 2) the Inspector has not found that exceptional circumstances exist for its removal from the Green Belt. Therefore it should remain part of the Green Belt.

**(F) Infrastructure and Transport Strategy**

28. Additional detail on infrastructure delivery issues should be included in the JCS modifications document.
29. The 2008 transport model is considered to be generally fit for purpose and waiting for the updated 2013 model would cause undue delay. Therefore, the Inspector does not recommend delaying progress to await the 2013 based model.

**(G) Trajectories**

30. Updated trajectories should be prepared for inclusion in the JCS.
- 2.6 For additional detail on these points please refer directly to the Interim Report - Appendix 1

**3. Meetings held since issuing of the Inspector's Interim Report**

- 3.1 On Thursday 9 June 2016 a JCS meeting was organised with the Leaders of the three Councils and the relevant officers. At this meeting the report was discussed and it was noted that discussions continue and the Council meetings progress as scheduled.
- 3.2 On Thursday 16 June 2016 a scheduled JCS Member Steering Group (MSG) meeting occurred and as part of that the following points were noted and agreed to be included within this report as comments to raise firstly within this report and with the Inspector at the July hearings (see Inspector's agenda for July 6/7 included at Appendix 2).

**MSG points raised:**

- 3.3 General comments:
  - Commitment to have a plan;
  - Concerns that communities and other interested parties in respect of new sites identified haven't had a fair opportunity to express their views to the Inspector;
- 3.4 Objectively Assessed Need (OAN):
  - Why is 5% affordable housing uplift needed, unclear on how it can commit to deliver affordable homes;
  - Alternative to 5% affordable housing uplift – alternative could be to increase policy requirement and not numbers;
  - Concerns around job numbers which have fed into economic uplift – these are uncertain over period of the plan;
  - Jobs need to come first, but plan is housing led;
- 3.5 Gloucester sites:
  - Transport infrastructure concerns regarding South Gloucester sites;
  - Concerns of relationship of South Gloucester sites with AONB and Robinswood Hill;

- Inspector needs to be consistent on application of green buffer concept e.g. North West Cheltenham - could this apply equally to other settlements?
- Can we increase urban numbers rather than development to the South of Gloucester.

3.6 Tewkesbury sites:

- Mismatch between where houses are recommended and location of jobs, this has implications for infrastructure on Tewkesbury Town;
- Fiddington – concerns regarding infrastructure and impact on junction 9 and A46;
- Concerns regarding apportionment of numbers from Tewkesbury sites to wholly meet Cheltenham and Gloucester’s requirements.

3.7 Cheltenham sites:

- Support for green buffer at North West Cheltenham;
- Loss of clarity with sites being passed to local plan;
- Cheltenham should meet its own needs;
- Disappointment that AMEC green belt report findings haven’t held.

**4. Recommended JCS Response to the Interim Findings**

4.1 The next stage in the JCS examination will be further hearing sessions in July to firstly discuss the implications of the Interim Report on the preparation of modifications and secondly if considered necessary by the Inspector, to consider the wording of proposed main modifications. The modifications are to address all of the issues explored previously at hearing sessions to date, but also need to address the recommendations made by the Inspector in the Interim Report.

4.2 Over the course of the summer the JCS authorities will continue to work on the policies in the Plan, integrating our response to the Inspector’s findings. These will be discussed further at the next hearing sessions and will be subject to change as we move forward through the main modifications part of the examination process. A full list of all modifications including the Main Modifications JCS plan version for consultation will be presented for approval to each Council at a subsequent meeting.

4.3 At this stage we are requesting that Councils:

- **Note** the Interim Report of the Inspector;
- **Agree** that the JCS officers attend the July hearings to discuss the Interim Report and the recommended way forward with the Inspector, identifying specific **consequences** and **key points** arising from the findings to the Inspector as detailed below and expressed through the June 2016 Council meetings on this report;
- **Agree** that a summary of comments made by Members at the Council meetings held by the JCS Authorities be passed to the JCS Inspector for consideration.

4.4 Below are listed the outstanding matters from the Interim Report and earlier hearings and the proposed approach to each:

**(A) Housing Numbers and Land Supply**

1. The JCS authorities note the increase in the demographic OAHN to 33,500 dwellings over the plan period to provide an economic-led housing requirement. Officers are directed to continue to develop the plan in accordance with the findings, delivering the OAHN within the trajectory and supply. In addition, to clarify with the Inspector an error in the Interim Report in the employment land supply figures and their use in calculating the housing requirements for each Council (the OAHN).  
(The employment allocation at Ashchurch (SA9) is noted as 34ha, actually it is only 14 ha. This will change the split of the economic usage. ).
2. The additional 5% policy uplift to the OAHN to total 35,175 dwellings requires further discussion with the Inspector over the robustness and effectiveness of this approach in delivering affordable housing and supporting five year housing land supply. The logic of translating the uplift into the delivery of affordable housing cannot be guaranteed.
3. The recommended buffers to five year housing land supply (20% for Tewkesbury and Cheltenham, 5% for Gloucester) are as the Inspector identified during the examination hearings and are noted. The JCS authorities will continue working on this basis.

**(B) Employment Land and Retail**

4. The increase in the JCS employment land provision, from 64 hectares (on the Strategic allocations) to at least 192 hectares for 'B class' use (inclusive of the Strategic allocations and Borough and City capacity) and the addition of the West Cheltenham Strategic allocation, is noted and the JCS authorities have established an approach to delivering this level of growth.
5. The requirement in the report for an immediate review of the JCS retail policy is noted by the JCS authorities. Officers are directed to continue to develop the plan in accordance with this finding and will continue to work on retail policy, including through district level plans, prior to the review.
6. The JCS will include maps of the existing town centre boundaries and retail frontages from the adopted Cheltenham Plan and Tewkesbury Local Plan as well as proposed City boundaries and frontages from the emerging Gloucester City Plan.

**(C) Strategic Allocations and Green Belt removals**

7. The JCS authorities note the Inspector's recommendation that Twigworth be included as a new strategic allocation. Officers will investigate the deliverability of the site, including potential capacity, with a full appreciation of the constraints and infrastructure requirements. This will also include discussions with various site

promoters and developers. The authorities would also like to highlight that this site has not been subject to public consultation since the Draft JCS (October 2013). Local Communities feel the need to present their case and circumstances to the Inspector. Officers should emphasise this to the Inspector to enable engagement with the examination as it progresses in the light of these findings.

8. The Inspector's recommendation to allocate land at West Cheltenham as a new employment-led Strategic allocation for approximately 45ha of employment land with residential development of around 500 units is noted. Local Communities feel the need to present their case and circumstances to the Inspector. Officers should emphasise this to the Inspector to enable engagement with the examination as it progresses in the light of these findings. Officers will continue to explore the deliverability of the site, building on the statement of common ground (Exam 198). Officers should continue to explore the options for a strong Green Belt boundary in this location which will endure well beyond the plan period.
9. The Inspector's recommendation to allocate land at Winnycroft, which lies solely within the Gloucester city boundary, as a strategic allocation in the JCS is noted. The capacity of this new strategic allocation is approximately 620 dwellings, and this will be taken off the Gloucester urban capacity figure leaving no net change to dwelling numbers from this allocation.
10. The Inspector's recommendation that the North Churchdown Strategic allocation is unsound is noted. The Inspector has been consistent in her opinion from her Preliminary Findings that this Strategic allocation is unsound, due largely to its impact on the strategic Green Belt gap between Gloucester and Cheltenham. The JCS will re-consider the housing supply and trajectory with the removal of this site and consequent reduction of 532 dwellings from the overall JCS supply.
11. The Inspector's recommendation for the reduction in size of the North West Cheltenham strategic allocation by 500 dwellings, to provide a green buffer around Swindon village, is noted. The JCS will re-consider the housing supply and trajectory with the removal 500 dwellings from this site.
12. The JCS authorities note the Inspectors recommendations on Leckhampton strategic allocation. The authorities' direct officers to discuss the treatment of the Tewkesbury part of this site, which is currently a commitment, and also the potential capacity on the Cheltenham part of the site, given this will be a matter for review in the emerging Cheltenham Plan. There also needs to be further consideration of the infrastructure impacts of the Inspector's proposed approach, particularly the consequences for future delivery of primary education in the area. These discussions may impact on the recommendation to remove this site as a strategic allocation.
13. The recommendation that exceptional circumstances exist for the removal of Green Belt parcels in the North West and North of Cheltenham are noted. Officers are directed to highlight to the Inspector the consequences of these



changes to the Green Belt which will necessitate the removal of adjacent parcels to form a strong Green Belt boundary. Similarly, the effects on Prestbury Conservation Area will need to be considered. Local Communities feel the need to present their case and circumstances to the Inspector. Officers should emphasise this to the Inspector to enable engagement with the examination as it progresses in the light of these findings.

14. The recommendation for an additional strategic allocation at Fiddington for approximately 900 dwellings is noted. Officers will investigate the deliverability of the site, with a full appreciation of the constraints and infrastructure requirements. Local Communities feel the need to present their case and circumstances to the inspector. Officers should emphasise this to the Inspector to enable engagement with the examination as it progresses in the light of these findings.
15. Officers will engage in further discussions with neighbouring authorities at Stroud and Wychavon. The discussion will include seeking agreements regarding the omission sites at Hardwicke and Brookethorpe/Whaddon (in Stroud district) and at Mitton (in Wychavon district), updating the existing Memorandum of Understanding with these Authorities.

**(D) Reserve Sites Policy, Local Green Space and Safeguarded Land**

16. The JCS Authorities note the Inspector's recommendation for a Reserve Site policy. This will provide a mechanism to bring forward sites if needed in the later stages of the plan period, that are not currently allocated in the JCS, which will be identified as reserve sites. The discussions with Stroud and Wychavon will include discussions in respect of this recommendation. Parts of Twigworth may also be considered appropriate for reserve site status or Safeguarded land status as further work on this allocation progresses.
17. The JCS Authorities note the Inspector's recommendations regarding Local Green Space at North West Cheltenham. Officers will include indicative Local Green Space Areas in future Indicative Site Layouts for the Strategic allocation, with associated policy wording, and allocate definitive Boundaries for the designation in the Cheltenham Plan.
18. The Inspector's interim finding of soundness regarding the safeguarded land at North West Cheltenham is noted.
19. The Inspector's interim finding that safeguarded land (Phase 2) at West Cheltenham should be removed from the Proposals Map and that exceptional circumstances for its removal from the Green Belt do not exist, is noted. Officers will highlight to the Inspector potential consequences for the delivery of Phase 1 (the West Cheltenham Strategic allocation) of this finding including potential loss of opportunity for relocation of Hayden Works and master planning for social sustainability that brings benefits to the wider area of West Cheltenham, and the difficulty of defining a Green Belt Boundary in this location based only on Phase

1. Local Communities feel the need to present their case and circumstances to the Inspector. Officers should emphasise this to the Inspector to enable engagement with the examination as it progresses in the light of these findings.

**(E) Infrastructure**

- 20. The infrastructure recommendations are noted and the JCS team will work to identify infrastructure needs for any additional strategic allocations.
- 21. The Inspector’s finding that the JCS can proceed with the proposed transport mitigation strategy, based on the 2008 model, although the strategy is to be amended as appropriate once the updated modelling (2013-based transport model) is available, is noted. This will be reflected in the JCS with a suitable note referring to the awaited update.

**(F) Trajectories**

- 22. As part of the above work on new strategic allocations, a new housing delivery trajectory and 5 year supply calculations will be prepared and this will also incorporate the 2016 SALA panel review of site availability and estimated urban capacity for the main centres. This will assist the JCS team in considering the extent to which the new SAs are needed in the plan period (and / or beyond).

**5. JCS Timetable**

- 5.1 The Inspector is inviting in the Interim Report a suggested programme with time scales going forward for the remainder of the examination from the JCS team. This is set out below for member consideration.
- 5.2 A further report will be put to all three Councils after the July hearing sessions with a full set of proposed main modifications for the purposes of approval for the formal public consultation.
- 5.3 Following the formal public consultation the Inspector will consider the responses.
- 5.4 It is then envisaged that the Inspector’s Final Report will then be issued and consideration of the Adoption of the JCS can take place shortly thereafter.

**The proposed JCS timetable is provided below.**

Item	Date	Notes
End of Stage 3 hearings	April 7	
Interim Report	May 31	PINS issued
Council Meetings Tewkesbury Cheltenham Gloucester City	June 28 June 30 June 30	Agree June 2016 Council report resolutions
Further hearings – discuss open issues with	July 6 and 7	

Inspector		
Hearings – main modifications	July 19-21 (to be confirmed)	
Re-drafting of JCS	August/September	All main modifications
Council Meetings Tewkesbury Cheltenham Gloucester City	tbd Sept 14 tbd	To agree Main Modifications JCS plan version for consultation
JCS Consultation on main modifications	October/November 2016	6 weeks minimum
Review of representations	December 2016/January 2017	
Inspector Final report	February 2017	
Adoption	March 2017	

## 6. Legal Implications

- 6.1 The purpose of the examination of the JCS is to assess whether the JCS has been prepared in accordance with the duty to co-operate, legal and procedure requirements and whether it is sound (as set out in paragraph 182 of the National Planning Policy Framework (“NPPF”) and local planning authorities should only submit a plan which it considers sound. The JCS was submitted for examination on 20 November 2014.
- 6.2 The Pre-Submission Version of the JCS (June 2014) (“June 2014 JCS”) was the publication version upon which representations were made and as the Inspector considered that there have been the subsequent changes (which have not yet undergone public consultation) as set out in the Submission Version of the JCS (November 2014) that go beyond what would fall within the category of minor amendments, the Inspector has been considering the June 2014 JCS during the examination rather than the Submission Version of the JCS (November 2014).
- 6.3 The Inspector has indicated that she is minded to find a number of the policies in the June 2014 JCS unsound; during the hearings and also initially within her Preliminary Findings dated 16 December 2015 and now within her Interim Report dated 26 May 2016.
- 6.4 The Inspector is therefore indicating that she would not be able to recommend that the June 2014 JCS without modifications is adopted and that the JCS can only be found to be sound with main modifications. The Inspector is inviting the JCS team to draft a set of main modifications, including those which have already been discussed during the hearings to date and those which flow from the Interim Report recommendations, for a pre-consultation main modifications hearing session towards the end of July.
- 6.5 It will be for the Inspector to set out in her Final Report, whether she is satisfied that the plan can be made sound with main modifications and if so, the exact wording of main modifications to be made.

- 6.6 Under section 23 of the PCPA 2004, it **is not possible to adopt a development plan document, that an Inspector has only found to be sound with main modifications, without the all the main modifications as recommended in an Inspector's Final Report.** Save for any minor amendments, which (taken together) do not materially affect the policies set out in the development plan document, the wording must be as the main modifications set out within the Final Report.
- 6.7 The Inspector's Final Report on the JCS will only be issued once the proposed main modifications have been subject to public consultation (and any necessary further Sustainability Appraisal work undertaken) and the Inspector has had the opportunity to consider the written representations made on these (it is not usual for further hearing sessions to be held subsequent to the public consultation on main modifications). The Inspector may amend or add the to proposed main modifications as consulted upon in the Final Report as she then feels necessary to make the JCS capable of adoption.
- 6.8 On the issue of the Final Report the examination is complete and it will then be for the JCS authorities to consider the adoption of the JCS.
- 6.9 Until the JCS is adopted any Green Belt sites without planning permission will not be taken into account in 5 year supply calculations and each authority's 5 year supply will be considered against sites within their respective administrative boundaries.

## 7. **Financial Implications**

- 7.1 The Government is currently analysing feedback to their technical consultation – "New Homes Bonus: Sharpening the Incentive" which has set out a variety of changes to the New Homes Bonus. The changes, which are proposed for 2017-2018 onwards, includes withholding new Bonus allocations from areas where an authority has not submitted a Local Plan for each of the years this remains the case.
- 7.2 Local Plan here being a development plan document, produced in accordance with the Planning and Compulsory Purchase Act 2004, setting out the strategic planning policies (including a clear assessment of housing needs and identifying key sites which are critical to the delivery of the housing strategy over the plan period) for the authority's administrative area.
- 7.3 Some responses to the consultation have suggested that the test should be adoption rather than submission. However, if submission is used this is unlikely to be other than where the submission remains live.

### **Programme Budget**

- 7.4 The implications of the Interim Report is that further costs beyond what has been budgeted may occur. Further evidence is necessary in relation to the proposed strategic sites and this will include understanding infrastructure needs, flooding issues, elderly care requirements, historic environment as well as sustainability appraisal of any changes/implications. As we progress these items, the actual specific costs will become clear. In addition it is most likely that further hearing sessions will be requested by the Inspector based upon the number of changes and

their impacts that are possible after the main modifications consultation (these were not originally budgeted). Such sessions imply costs from the Inspectorate, programme officer as well as legal support. Again the actual specific costs of these will be better understood as the changes are further defined.

**Appendices**

- 1 Inspector's Interim Report
- 2 Inspector's Agenda for July 6/7 hearing
- 3 & 3A Plans showing for indicative purposes only the Sites/Green Belt releases recommended by the Inspector