



Joint Core Strategy

Gloucester • Cheltenham • Tewkesbury

Developing the Preferred Option Consultation Document December 2011



GLOUCESTER
CITY COUNCIL



CHELTEMHAM
BOROUGH COUNCIL



Tewkesbury
Borough Council

**Working beyond
boundaries
& shaping
our future**

FOREWORD

This Joint Core Strategy will establish how Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council will work collaboratively on a cross boundary basis to produce a long term strategic plan for the area up until 2031.

The scale and uniqueness of the Joint Core Strategy area presents the three councils with numerous challenges and requires a long term commitment, a sharing of resources and a political understanding if these challenges are to be met effectively. Whilst the three centres Gloucester, Cheltenham and Tewkesbury town each have their own distinctive character it is recognised that there is a strong functional and economic relationship between the three centres providing access to shops, facilities, open countryside, transport and infrastructure. The Joint Core Strategy is the document which will guide the enhancement of the area establishing how the three local authorities will respond to the pressures and challenges which the area faces ensuring that it is able to compete with other centres.

In response to the freedom afforded to local authorities to devise their own housing and employment targets the three councils have produced their own local growth projections to guide the development of the area. A considerable amount of time has been spent preparing this document and as part of this we have consulted with a wide range of stakeholders and organisations, reviewed existing evidence, commissioned new studies and consulted with local residents and businesses.

The Joint Core Strategy will establish a clear set of ambitions for the area focusing development at Gloucester, Cheltenham and Tewkesbury town. It also recognises that the rural settlements in the Joint Core Strategy area play a crucial part in the heritage and individuality of the area both at present and in the future.

There is a recognised need and an agreed political consensus to produce the Joint Core Strategy in guiding the development of the area up to 2031. We believe that the options presented in this document provide a clear approach as to how the Joint Core Strategy will manage the three competing pressures; economic, social and environmental in order to ensure that development in the area is sustainable for both present and future generations.

We would like to take this opportunity to thank you for your contribution to the development of the plan and encourage you to participate further so that you can continue to influence the decisions made for your area.

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INTRODUCTION

What is the Joint Core Strategy?

The Joint Core Strategy (JCS) is a joint development plan being prepared by Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council for the period 2011 to 2031. It will form part of the statutory development plan for each council and provide the strategic planning framework for each authority's future local plan. It will contain a number of strategic allocations and development management policies to guide future development in the JCS area.

Policies contained within the JCS will replace a number of development plan policies already contained within existing authority local plans and provide the structure for the preparation of more detailed future local plan allocations and policies by individual councils. These will be prepared either individually or in partnership between the JCS authorities. However, some existing local plan 'saved policies' will continue to be used until a new and complete suite of policies is finalised. A full list of saved and replaced policies will be set out within Local Development Schemes for each authority.

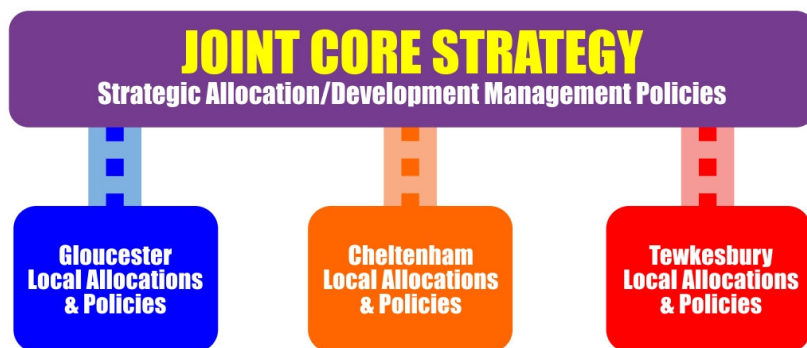


Diagram 1: Strategic Allocation/Development Management Policies

Why produce a Joint Core Strategy?

There is a functional relationship between the three authority areas which ignores their administrative boundaries. For instance; the three authorities make up a housing market area and an economic area (which also supports the wider Gloucestershire area), whilst communities choose to use each other's services such as shops, leisure and health facilities, amenities and countryside regardless of administrative boundaries that exist. It therefore makes sense to work together to plan for the whole area in a more coherent way.

What is the Developing the Preferred Option Consultation Document?

This document builds upon previous public consultations and sets out the vision for the JCS area to 2031 and a number of emerging options for how this can be achieved. Included within this document are the potential employment and housing requirements for the JCS area. A number of strategic allocations to meet development requirements for 2011 – 2021 are identified based on our assessment of consultation and evidence base work carried out to date. Options for broad locations to deliver development requirements post 2021 across the JCS area are also identified.

This document has been informed by a number of factors, including national planning policy, engagement with communities and stakeholders and an extensive evidence base.

In order to inform this stage of the development plan we have engaged with local communities and businesses, town and parish councils, national and local organisations, infrastructure providers and developers and agents.

The production of the Joint Core Strategy embodies continuous consultation however specific consultation events have also taken place including:

Issues and Key Questions consultation	November 2009 – February 2010
Parish Council events	February – March 2010
Stakeholder engagement	July 2010
Joint Core Strategy Part 1 online consultation	June 2010 – August 2010

The Issues and Key Questions Consultation, parish council events and stakeholder engagement events provided people with an opportunity to develop their understanding of the Joint Core Strategy and voice their concerns and aspirations for their area. The three events provided a summary of the key issues the area faces and helped to develop the vision for the area. In addition three draft 'spatial options' were discussed for how the JCS could deliver the emerging vision. These three 'spatial options' were based upon economic, social and environmental led approaches to policy development. An online consultation period was then held building upon the feedback received on the Issues and Key Questions consultation.

It is recognised that the views of local residents and interest groups are key to developing a plan which will meet their needs and aspirations. In addition it is also acknowledged that for the document to be found 'sound' it must satisfy a number of criteria. A substantial evidence base of both existing information and commissioned studies has been gathered. It is also a requirement that the document is taken through a sustainability appraisal process which considers the environmental, social and economic outputs of the plan and ensures that development meets the needs of both present and future

generations. An initial sustainability appraisal report has been published alongside this document, available to view on the Joint Core Strategy website at www.gct-jcs.org.

What happens next?

Following consultation the three councils will carefully consider all representations received and where appropriate seek to resolve any objections. This will then be used to inform the Preferred Option Document before the final Joint Core Strategy is submitted to the Secretary of State for independent examination.

The timetable for the production of this development plan document can be viewed on the dedicated Joint Core Strategy website at www.gct-jcs.org. The timetable from this point onwards is as follows:

'Developing the Preferred Option' public consultation	December 2011- February 2012
Preferred Options consultation	Summer 2012
'Pre-submission' public consultation	Early Spring 2013
Submission of the Joint Core Strategy	Summer 2013
Examination	Autumn 2013
Adoption	January 2014

How to get involved

The three Joint Core Strategy authorities would like to invite you to comment on the Developing the Preferred Option consultation document for a period of **approximately nine** weeks between **13th December 2011** and **5.00pm on 12th February 2012**.

Copies of this document are available at locations across the JCS area including libraries, community/resource centres and in the reception area of the local planning authorities' council offices. Details of these locations can be found on the Joint Core Strategy website. Specific public consultation events are also being held across the JCS area.

Comments on the Developing the Preferred Option Document are encouraged to be made online via the Joint Core Strategy website at www.gct-jcs.org. Alternatively comments can be submitted by email to info@gct-jcs.org, or in writing to:

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

THE JOINT CORE STRATEGY AREA

All local authorities are statutorily required to prepare a development plan; the most important part of this plan is the core strategy which establishes the long term strategic direction for each area including identification of development requirements. Gloucester, Cheltenham and Tewkesbury councils have agreed to prepare one core strategy covering the entirety of the administrative areas of each of the authorities. Many of the characteristics of the area and the issues which it faces, such as flooding, outstanding landscape and the need to plan for sufficient development to provide jobs and housing, including affordable housing for future residents are common across the area. There are strong functional, economic, infrastructure, policy and cross boundary relationships which mean that working together on a Joint Core Strategy makes good planning sense. The Joint Core Strategy is based on collaborative research into the three authority areas' characteristics, relationships (with each other and adjoining areas), past trends and future predictions. This introduction provides a brief summary of the JCS area's communities, economy and environment in 2011, as informed by detailed evidence available to view at www.gct-jcs.org.

The Joint Core Strategy area includes more than 60 settlements and stretches from the Cotswold Hills to the Severn Vale. The M5 motorway corridor passes through the centre. Gloucester and Cheltenham are the main urban centres. The market towns of Tewkesbury and Winchcombe act as employment hubs and providers of services to rural areas. Gloucester and Cheltenham are separated by the existing Green belt, most of which lies in Tewkesbury Borough.

The rural landscape includes the Cotswold area of outstanding natural beauty (AONB), several sites of special scientific interest (SSSI), numerous nature and landscape conservation areas, woodlands and good quality agricultural land. Flood zones along the Rivers Severn and Avon and their tributaries influence much of the sub-region. A recent major flood event occurred in July 2007, which devastated local communities and isolated important infrastructure. The impact of this event and the lessons learnt are now guiding management of watercourses and floodplains and influencing the location of development with the introduction of innovative drainage systems.

Population and housing

In 2011, the JCS area was home to a total of 322,600 ¹ residents, with 120,500 (38%) in Gloucester city, 116,200 (36%) in Cheltenham borough, 17,500 (6%) in Tewkesbury town/Northway, and 63,800 (20%) in the wider Tewkesbury borough.

The overall trend for the JCS area, as a whole, is towards an ageing population although Gloucester city is expected to experience a significant rise in the young people and working age group.

In 2011, it is estimated that there are 140,500 households in the JCS area. In terms of new homes provided, 8,266 new homes have been delivered in the JCS area between April 2006 and April 2011, with Gloucester city the main provider with some 3,800 new homes. Tewkesbury borough has provided approximately 2,200 new homes and Cheltenham some 2,100 new homes. Average annual delivery

¹

Gloucestershire County Council estimates (2009)

rates (over the last 5 years) for Gloucester, Cheltenham and Tewkesbury borough are 770 dwellings, 430 dwellings and 440 dwellings respectively totalling 1,650 dwellings for the JCS area as a whole.

Housing need in both the urban and rural areas remains a pressing issue for the JCS authorities. The latest evidence on housing need estimates a requirement of some 2,050 new affordable homes every year with Cheltenham being the highest in housing need with a requirement of 913 new homes per annum. Gloucester is estimated to require 787 new homes per annum and Tewkesbury borough requires 355 new homes per annum. The figures for Tewkesbury borough indicate a very real need to increase the supply of rural affordable housing.

As can be seen from the above, housing need in the JCS area is higher than historic supply, particularly in Cheltenham where housing need is more than two times higher than actual supply of all new homes. Since April 2006, 2,015 affordable homes have been provided in the JCS area.

Economy, employment and skills

Gloucester and Cheltenham provided 136,000 jobs between them in 2009, which equates to some 44% of the county's jobs, with Tewkesbury borough provided a further 44,000 jobs, 14% of the county's jobs.

Employment in the JCS area 2005 to 2009

	2005	2006	2007	2008	2009
Gloucester	70,000	71,000	71,000	68,000	73,000
Cheltenham	64,000	61,000	61,000	63,000	63,000
Tewkesbury Borough	41,000	39,000	41,000	41,000	44,000

Table 1: JCS employment data 2005 to 2009

Source: Nomis www.nomisweb.co.uk (figures have been rounded)

Employment is dominated by public administration: education, health, distribution, hotel and restaurants, banking, finance and insurance sectors, as well as some manufacturing.

Despite the generally high calibre of schools, there are differences in skills and qualifications (and accordingly earnings) across the area. Despite this, the evidence indicates that there is a net outflow from the county of people between the ages of 15 and 29 years, which is weakening the potential of the local workforce and making it less attractive to business. In addition, there are high numbers of young people aged 16 to 18 years who are not in education, training or employment.

Unemployment figures have been rising in the county since May 2008 and the April 2009 level (12,200) represents a doubling of the long-term trend for the county, with widespread impacts on almost all sections of the local economy.

Retail provision varies between and within locations from high street chains to small independent shops. Since the 2007 recession, vacancy rates have increased in both larger and smaller centres.

Affluence and inequality

Whilst the Joint Core Strategy area is considered to be relatively affluent, this is not uniform across the area. There are pockets of deprivation including eight of the most deprived areas in England, which suffer from low incomes, unemployment, poor health and housing, low educational attainment and crime and disorder.

There are also many highly affluent rural areas; particularly in the east of Tewkesbury borough. Notwithstanding this, many residents have no effective public transport access to essential services.

Transport and infrastructure

The JCS area is well served with rail, motorway and strategic road connections, and Gloucestershire Airport. These transport links connect the area with the rest of the UK, particularly the M5 motorway corridor and links to the West Midlands and southwards to the M4 motorway corridor.

Almost 90% of Gloucestershire residents work within the county. For the small percentage that travel out of the county to work, Bristol, South Gloucestershire and Oxfordshire are popular destinations. Gloucester and Cheltenham draw in significant commuters from within Gloucestershire.

While this level of inward commuting within Gloucestershire is good for the local economy it does place strain on the central areas in terms of traffic congestion and pollution. Whilst the major urban areas are compact and offer potential for improvements to local cycling and pedestrian links, maintaining and improving public transport links across the rural areas is more challenging. The rural areas have much higher levels of car dependency for access to services.

Initial assessment of existing infrastructure identifies that additional provision will need to be made for health, transport and education infrastructure to support any increase in housing.

OUR VISION

The vision has been informed by: the Sustainable Community Strategies for Gloucester, Cheltenham and Tewkesbury borough, the JCS Sustainability Appraisal, consultation responses and the JCS evidence base.

Our vision is to produce a strategy which fosters growth in the local economy and provides sufficient homes, including affordable homes, in sustainable locations, without increasing the risk of flooding, or harming high quality landscape, whilst maintaining and enhancing the separate vitality, identity and character of individual settlements.

By 2031, Gloucester city and Cheltenham and Tewkesbury boroughs will be vibrant and successful centres meeting the needs of business, communities and visitors. The surrounding countryside will continue to be protected and enhanced, whilst the rural economy and rural communities will thrive. The high quality landscape of the Cotswold AONB will continue to be protected.

The historic settings of the urban areas should be conserved and enhanced while offering improved and accessible housing, jobs, open spaces, shopping, leisure, healthcare and education/training opportunities. New housing within and adjacent to the urban centres would maximise opportunities for sustainability, and in rural communities, to meet the area's housing (and affordable housing) needs without compromising local distinctiveness.

The JCS area will support a dynamic low-carbon economy with a range of employment opportunities with well-balanced and diversified, high-value businesses, and will foster economic growth by having an adaptable and skilled workforce.

Within the JCS area travel and congestion will be improved by means of better links between transport hubs and the city and town centres, reduced through-traffic, improved traffic management, improved cycle and footpath networks through urban and rural areas, improved high speed road and rail links within the area and to London and by capitalising on the accessibility to the M5 motorway.

Development within Gloucester, Cheltenham and Tewkesbury borough will take account of the areas' environmental capacity and the causes and consequences of climate change, including a robust approach to reducing flood risk. Residents will have access to a network of green infrastructure; with the potential for a regional park to be situated between the main centres, based upon the River Severn tributaries.

What does this mean for Gloucester city and adjoining communities?

Gloucester will have established its historic central core as a place for inward investment and opportunity. Key urban sites including King's Square, Greater Blackfriars, Greater Greyfriars, and the railway corridor will have been successfully regenerated to provide new jobs and homes within central areas of the city to meet the needs of its naturally growing population and to encourage inward investment. The King's Quarter regeneration will have played a key role in increasing the vitality and

viability of the City Centre environment and shopping experience combined with improved pedestrian, cycle and public transport improvements. A vital and viable City Centre will have raised Gloucester's profile as a strong, well connected and resilient location to be proud to live and work in as the economic and administrative capital of the county.

New high-quality business parks will be developed to retain and attract investment, thereby supporting the economic resilience of Gloucester and the surrounding area.

New peripheral development could take place to the north and east of the city within Tewkesbury borough, at the adjoining settlements of Brockworth, Longford, Innsworth and Churchdown. This will need to reflect the individual identity of those existing settlements and seek to maintain their existing character and 'village' feel.

The waterfront will be embraced, reinforcing links between the river and canal, regeneration areas and the city centre and raising the profile of its architectural history and roman origins. In turn, this will improve investor confidence and tourist appeal. Its links with the A40 corridor and with Cheltenham will be used to support the potential of the city to attract investors and visitors alike.

Gloucester's natural environment will continue to be safeguarded and improved, particularly through the protection and enhancement of landscape features and key habitats within the city's boundary, such as Robinswood Hill and adjacent to it at Chosen Hill.

What does this mean for Cheltenham and adjoining communities?

Cheltenham's development pattern is encompassed on all sides by the Cotswold AONB and Green belt. Within the borough are a number of villages such as Prestbury, Leckhampton, Charlton Kings and Swindon Village which although significantly influenced by the expansion of Cheltenham retain their own character and 'village' feel. The setting of Cheltenham is derived from its location at the edge of the escarpment, its regency heritage and garden landscape.

Cheltenham will continue to follow the principles that has seen it referred to as 'a town within a park'; retaining its regency character, tree-lined promenades and streets, attractive green spaces and squares, whilst creating contemporary, new developments set within attractive new green spaces and based around the regency design principles and complimenting the existing character.

The town itself will continue to be a focal point for economic and cultural activity and, therefore, it is important that the borough makes provision for affordable homes, jobs, infrastructure and facilities over the next 20 years to support mixed and balanced communities and attract inward investment.

However, there is limited capacity to accommodate all of these competing development objectives within the urban area. Consequently, some peripheral development may be needed to achieve these. Recognising the environmental constraints of the Cotswold AONB, Cheltenham has a limited number of options for peripheral development to the east of the borough, with north-west and south Cheltenham considered the more sustainable locations for long-term development.

The borough has an ageing stock of employment sites, and in recent times companies have relocated away from the area. This could be addressed through the provision of high quality, modern premises both in the town centre and in the form of a number of appropriate scale business parks elsewhere in the borough in order to retain and attract investment, thereby supporting the economic resilience of Cheltenham and the wider JCS area.

Retail and tourism will continue to make a major contribution to Cheltenham's economy. In order to ensure this, Cheltenham Development Task Force will deliver new sites through the redevelopment of North Place and Royal Well, improving links with the Lower High Street, Brewery and Montpellier shopping areas.

What does this mean for Tewkesbury town?

Tewkesbury is an attractive rural market town with significant heritage resulting in a high quality historic environment. It forms part of a wider urban area incorporating Northway and Ashchurch which have different characters.

Tewkesbury town is at the confluence of the River Severn and River Avon and these riversides whilst currently under-utilised, have great potential as a leisure destination and in attracting investment to the town. The Tewkesbury Town Masterplan will look to deliver the redevelopment of key sites across the town centre, and a clear move to embrace Tewkesbury town's unique riverside location, will be the catalyst for such changes. It may also offer opportunities for improved flood mitigation schemes to reduce the impact of future flooding events on the town.

By 2031, Tewkesbury town centre will have strengthened its role as a desirable place to live and work, and will be a popular visitor destination. The town will enjoy a strong reputation across the county and further afield, with unique attractions and thriving day- and night-time economies fulfilling a role that complements larger nearby centres and supports the rural borough.

The Ministry of Defence base at Ashchurch is part of the wider Tewkesbury town area and could provide a brownfield redevelopment opportunity for mixed uses, should it close.

Additional high quality business development will retain and attract investment, thereby supporting the economic resilience of Tewkesbury town and the surrounding area.

All development in the area will recognise the importance and prevalence of flooding issues in the area reducing the regularity and severity of such risks as far as is practicably possible.

What does this mean for rural Tewkesbury borough?

The character of the rural area will be protected and enhanced. Opportunities for farm diversification for employment or rural tourism could further support the rural economy and will be encouraged.

All development in the borough will recognise the importance and prevalence of flooding issues in the borough, reducing the regularity and severity of such risks as far as is practicably possible.

There are existing pockets of rural deprivation, partly the result of isolation from key services or employment opportunities. These issues will be addressed through the conversion of vacant and derelict premises, development of appropriate-scale businesses, and better broadband provision. Additional housing, will help to support existing and new services in rural areas and help to improve self sufficiency of rural settlements.

Public transport will be improved, particularly the access between the larger rural settlements and the main urban areas. Notwithstanding this, the ability to serve the entire rural hinterland is limited and the importance of the car will continue.

By 2031, the rural areas will be prosperous and playing their part in the JCS economy. Rural communities will be vibrant and not simply dormitories for the urban areas, with good access to services and availability of affordable housing. In addition to any special provision through a Green Infrastructure Strategy, distinctive landscape character will have been protected, landscape features maintained and enhanced, and the countryside will be richer in wildlife with improved access for all. The tranquillity of the countryside will have been safeguarded and noise and light pollution minimised. New development will be appropriate in scale, design and energy efficiency. The Green belt will be managed to enhance its contribution to the landscape, biodiversity and access.

STRATEGIC OBJECTIVES

The following strategic objectives have been identified in order to achieve the vision, delivering change through the identification of suitable opportunities and enabling partners and stakeholders to deliver social, environmental and economic priorities. These objectives are inter-related and should be considered together in the policy-making process.

- **Address the causes and consequences of climate change**
- **Manage and reduce flood risk**
- **Allocate strategic development in support of sustainable urban and rural communities and the conservation of strategic open space**
- **Conserve and improve the built environment**
- **Conserve and improve the natural environment**
- **Foster economic growth**
- **Provide for local housing need**
- **Address social inequality, inclusivity and provide for healthier and safer communities**
- **Improve skills and educational attainment**
- **Increase access to jobs/services via sustainable transport modes**

Address the causes and consequences of climate change

- Promote new opportunities for high performance buildings, local low carbon buildings and decentralised energy generation
- Build on existing high levels of short distance commuting
- Reduce the need to travel by maximising the provision of sustainable travel, promoting zero car use and supporting initiatives such as car clubs
- Support renewable and low-carbon developments
- Promote food security by protecting where possible high-grade agricultural land and allotments
- Ensure new development maximises opportunities for environmental enhancements

Manage and reduce flood risk

- Ensure development does not exacerbate the segregation of communities and that infrastructure is adequately protected from the threat of flooding
- Maximise the opportunities to use land for active flood plain and protect and enhance existing flood defences
- Reduce flood risk to and from new development through location, layout and design, incorporating appropriate sustainable drainage systems (SuDS)
- Use opportunities offered by new development to reduce the causes and impacts of flooding
- Ensure development does not reduce the quality of surface and groundwater and supports rainwater harvesting where possible

Allocate strategic development in support of sustainable urban and rural communities and the conservation of strategic open space

- Maximise opportunities for development within existing urban areas with a phased approach for the development of peripheral sites
- Allocate development with reference to a defined settlement hierarchy which reflects the focus on urban areas and accessibility of settlements
- Make full, efficient and sympathetic use of previously developed land
- Re-use existing buildings where possible and sustainable
- Consolidate development in and adjacent to urban areas
- Recognise the role private gardens and incidental green space make to the strategic green space network

Conserve and improve the built environment

- Apply urban design principles to create a sense of place in new development
- Maximise the efficient use of previously used land
- Ensure urban regeneration is the priority for Gloucester, Cheltenham and Tewkesbury town, particularly to secure the vitality and viability of town centres
- Prioritise and protect the delivery of key sites within Gloucester of Kings Quarter, Greater Greyfriars, railway corridor, Gloucester docks and Greater Blackfriars
- Prioritise and protect the delivery of North Place, Royal Well, Coronation Square and other key regeneration sites in Cheltenham
- Prioritise and protect the delivery of key sites identified through Tewkesbury Town Centre Master Plan and under utilised urban land, including DSDC Ashchurch
- Conserve and improve the wealth of existing historic and architecturally important buildings, streets, waterways and spaces
- Ensure new development makes a positive contribution to the local environment, economy and community

Conserve and improve the natural environment

- Conserve, manage and enhance the area's unique natural environment and great biodiversity, including its waterways, SSSIs, the Cotswold AONB, areas of landscape and biodiversity importance
- Adopt a co-ordinated, partnership approach to creating and managing all green infrastructure including the 'greening' of the urban environment via tree planting
- Promote and capitalise on the area's environmental assets as both tourism opportunities and opportunities to increase social wellbeing

Foster economic growth

- To support the Local Enterprise Partnership (LEP), the JCS needs to identify and deliver a supply of employment land within central areas and on the periphery of the urban areas and to improve the economic resilience of the JCS area

All sectors

- Protect existing employment areas from inappropriate development for other uses.
- Direct employment development to sustainable locations
- Deliver key employment locations particularly those identified by GHURC, Cheltenham Development Task Force and the Tewkesbury Town Centre Masterplan
- Recognise the role of non- B class employment in the provision of future employment including tourism, retail and leisure opportunities
- Provide for rural employment needs through support for agriculture, farm diversification, development of small rural business units and conversion of existing buildings for rural business use
- Maximise and capitalise on community identity, image, local context, historic environment and culture
- Promote the low carbon economy

Retail

- Promote a complementary retail offer across Gloucester, Cheltenham, Tewkesbury and the market towns, to more effectively compete with larger centres
- Promote a “city/town centre first” approach, in turn providing greater support for the redevelopment of key urban retail sites
- Support local centres across the JCS area and village shops serving the rural community

Tourism

- Develop the area’s role as a destination within the South West
- Support the continued regeneration of Gloucester docks, Kings Quarter and Blackfriars plus public realm and other town centre improvements in Cheltenham and Tewkesbury
- Encourage and support hotel provision, high quality venues, museums, galleries and sports facilities
- Promote the concept of a regional park for the River Severn and washlands

Provide sufficient homes

- Deliver good quality new housing to meet the needs of the current and future population and ensure greater affordability for all sectors of the community
- Provide housing on suitable deliverable sites of the right size, type and tenure in sustainable locations that provide good access to jobs and services and protect the quality of the environment

- Ensure all new housing developments contribute to the creation of mixed, sustainable communities
- Ensure a balance is achieved between new housing development and employment provision.
- Ensure adequate provision of associated social and physical infrastructure
- Deliver all new housing to 'good' or 'very good' Building for Life standards and to the Code for Sustainable Homes as a minimum
- Meet the needs of all age groups and communities, including provision for gypsies, travellers and travelling showpeople

Address social inequality and inclusivity and provide for healthier and safer communities

- Create stronger communities by planning to reduce inequality and social exclusion, and to increase social wellbeing and access to jobs and services
- Target support for the most deprived wards
- Plan to meet the needs of an ageing population, and those of other vulnerable groups including young disabled people
- Ensure that new communities are integrated with existing communities
- Encourage healthy lifestyles and a well society through access to key community facilities and services, open spaces and cycle/foot paths

Improve skills and educational attainment

- Build on the existing high quality of education and training in the area by facilitating high quality and accessible provision of such services in new and existing developments
- Foster the environment for entrepreneurship, business start-ups and sustainability, high growth rates and local business support

Increase access to jobs/services (via sustainable transport modes)

- Provide safe walking or cycling routes to a wide range of shopping, employment and community facilities as a key element of a sustainable, low-carbon future
- Provide innovative transport solutions through planning and urban design to increase use of public transport, walking, cycling and powered two-wheelers – and thereby reduce private car use (reducing congestion and increasing safety and quality of life)
- Improve green infrastructure within urban and rural areas to provide movement corridors and better permeability
- Provide for good access to the countryside and all open spaces through the retention and development of a comprehensive green infrastructure network
- Improve access to services in rural and urban areas through new development, improved transport links and better relationships between settlements

DEVELOPING THE PREFERRED OPTION

As set out at the beginning of this document, the JCS is a joint development plan being prepared for the three authorities of Gloucester City, Cheltenham and Tewkesbury Borough Councils. It sets the overarching strategy for development within the area up to 2031. This section sets out the manner in which the preferred option is being developed. Further information and evidence is available on the JCS website.

What scale of development is required?

The government has set out that with the proposed revocation of regional housing and employment targets it is now the responsibility of local planning authorities to establish their own housing and employment requirements based upon locally derived evidence.

For the JCS authorities, the primary evidence on the need for new homes is found within the local population and demographic projections published by Gloucestershire County Council. This provides the authorities with a good basis for understanding how population levels may change over the plan period. In planning for new homes it is also important to make sure that there are sufficient opportunities for creating new jobs for people living in the Gloucestershire area. For this the authorities are using the most up-to-date information on local and national economic job projections as set out below.

How many homes need to be provided for?

The most recent local projections provided by Gloucestershire County Council² have forecast that the JCS area could have a population of 367,800 people by 2031. This means a rise of approximately 45,200 residents compared to an estimated 322,600 people living in the area in 2011. The housing needs assessment for the area identifies an ongoing need for significant affordable housing³. Using this information it is estimated that the number of new homes required in the JCS area is 36,850 new homes, which means that 1,840 new homes would need to be provided every year. This figure compares with an annual average for the last five years of 1,650 new homes, whilst between 2006 and 2008 the amount of new homes each year exceeded levels of 2,000.

The Gloucestershire affordability model (GAM) was commissioned by the six Gloucestershire district authorities and the county council as a means of informing the decision making process in terms of the levels of housing which may be required within Gloucestershire for each of the authorities' development plans. The model uses demographic and economic projections to help make forecasts as to how the housing market may look over the plan period and therefore helps to address issues such as affordability and housing need.

² Projections taken from Gloucestershire County Council Housing Trend Analysis Report May 2011 available at [http://www.gct-jcs.org/Documents/EvidenceBase/GloucestershireHousingTrendAnalysisPopulationandHouseholdProjections\(May2011\).pdf](http://www.gct-jcs.org/Documents/EvidenceBase/GloucestershireHousingTrendAnalysisPopulationandHouseholdProjections(May2011).pdf)

³ Gloucestershire Housing Needs Assessment November 2009
<http://www.gloucestershire.gov.uk/inform/index.cfm?articleid=99610>

It is clear from the consultation to date, that many people have concerns about the level of housing growth and the implications for greenfield sites and existing communities. Therefore, in developing this strategy, consideration has been given to meeting housing need within existing urban areas and through existing planning permissions and through the provision of 2,400 dwellings in the rural parts of Tewkesbury borough only. It is estimated that this would provide approximately 16,200 homes. The implications of this are set out in Scenario A later in this document.

While the estimated number of new homes needed every year in the JCS area is 1,840, the JCS authorities are providing the opportunity for people to comment on whether this is the appropriate level to plan for, or whether the authorities should plan for a higher or lower number of homes. In addition to scenario A above, the following range of +/- 10% are being consulted upon:

Scenario	Total Homes	Homes per year	Sensitivity range
B	33,200	1,660	-10% (similar to annual housing delivery 2006 -2011)
C	36,850	1,840	Current local projection of housing need
D	40,500	2,025	+10% (similar to annual housing delivery 2006 – 2008)

Table 2: Housing requirements

This range of housing levels is included within a set of scenarios. Following this consultation the JCS authorities will consider the final number of new homes to be delivered in the JCS area. This will be set out in the next JCS publication in summer 2012. These scenarios will undergo further testing through the Gloucestershire affordability model, the sustainability appraisal process and assessment against other JCS evidence base on housing need and land availability.

The sustainability appraisal (SA) assesses the plan against a number of key environmental, economic, and social criteria to establish the effects of its implementation to maximise its benefits and mitigate any downsides.

How many jobs should we provide for?

Previous consultation has established the importance of creating jobs and improving the competitiveness of the area. This is reflected in the vision. It is important that the JCS area plans appropriately for the number of jobs needed over the next twenty years.

This reflects the Gloucestershire LEP ambition, is to drive economic growth, improve productivity through increasing gross value added (GVA) and encouraging business creation. They will have a key role to play in supporting the implementation of the JCS seizing commercial opportunities while we transit to a low carbon economy, balancing economic activity across a broad structural base.

At the present time of continued economic uncertainty there is no clear evidence on the likely speed of full economic recovery or whether the country might face a further recession. However the cyclical nature of the UK economy means that a future upturn is expected, long term economic forecasting that evens out any periods of growth or decline and consequently has a greater reliability than short term forecasting. The JCS authorities are therefore planning to increase the long term economic competitiveness of the JCS area as part of this strategy.

To estimate the number of jobs to plan for, the JCS authorities have used the latest economic job forecasts provided in their employment land requirements evidence. This evidence sets out that there are an estimated 177,000 jobs in the JCS area at present. There are a range of forecasts for the JCS area which suggest an increase of between 20,000 to 35,000 new jobs over the period to 2031.

Not all of these jobs, however, will require additional employment land and it is important to acknowledge this in identifying areas for new employment land provision. Using the JCS economic evidence base it is estimated that the range of additional employment land would be between 34 and 62 hectares. Further work will be done to refine these requirements but at this stage a mid point of 46 hectares is included in the strategy.

This however, represents a minimum level of jobs expected derived from baseline economic projections. Further work is required to be undertaken in developing the preferred option to identify the overall level of jobs needed to support the population demands associated with the housing scenarios set out later in this document, and the need to increase the economic competitiveness of the JCS area. This 46 hectares should therefore be considered as a minimum requirement and the JCS authorities are consulting on whether the requirement should be higher or lower than this as well as to where this should be distributed, taking into account the need to increase the quality of employment land on offer.

The final employment land requirement will be set out in the Preferred Options document in 2012 which will be informed by the preferred level of new homes requirement and further analysis using the Gloucestershire affordability model.

Linked with employment is retail provision which is both a source of jobs and a key service function for the designated centres within the JCS area. A level of retail provision for the JCS plan period is currently

being established through a joint retail study and this will inform the next phase of consultation in the Preferred Options document in 2012.

What is the approach for accommodating the levels of development?

In order to develop a strategy for the JCS area, the authorities consulted on 3 potential options in 2010 which included a number of ways the JCS strategy could be taken forward. These options comprised:

- a strategy that places a higher reliance upon economic resilience.
- a strategy that places a higher reliance upon resilience to climate change
- a strategy that places a higher reliance upon stronger communities.

Following consultation at the stakeholder events, none of the options as presented were considered to be the most appropriate way forward in isolation and one which incorporated important aspects from each of the spatial options was favoured, but with particular focus on the economy. This has led to the JCS strategy set out in the following section which includes an emphasis upon increasing the economic competitiveness of the JCS area.

Following the above consultation and further sustainability work, the approach put forward in this document is based upon one that focuses development upon the principal settlements of Gloucester and Cheltenham close to existing areas of population and jobs to maximize existing opportunities. Where the urban areas do not have the capacity to accommodate all the development requirements⁴ the next most sustainable locations are on the edge of the urban areas, again where development is close to existing town centres, areas of employment and essential to services and facilities.

Beyond this, development should be directed to Tewkesbury town in accordance with its role as a main market town, and again where development cannot be accommodated within the urban area, the next most sustainable locations on the edge of the town should be investigated. While the main towns should be the focus for new development, the rural areas also play an important role in providing new homes and services and can accommodate smaller amounts of development proportional to their size and function. A settlement hierarchy has been prepared on this basis.

Other reasonable alternatives considered:

During the earlier consultation, the strategy option for climate change considered the possibility of a new settlement rather than peripheral development around the larger urban areas. Whilst this could possibly reduce the pressures on the land around existing urban areas and existing facilities within these areas, the level of infrastructure required to support a new settlement is so significant that this is not a viable option. However, improved and new facilities can be provided more readily for the existing urban areas and any new communities through peripheral development. Previous studies have also shown this option not to be favoured.

⁴ Refer to Strategic Housing Land Availability Assessments in the JCS evidence base

Under the stronger communities strategy option consideration was given to greater dispersal to rural settlements. It was considered that infrastructure and sustainability factors meant that this was not a viable option.

Identification of locations in accordance with the strategic approach of focusing on the main urban areas.

On the basis that the approach put forward is to focus development within and on the edge of existing urban areas rather than distributing more development across the rural areas, work has been undertaken to estimate the capacity of each urban area. This has determined how much development can be realistically accommodated within the urban areas including brownfield sites and therefore what level of development needs to be found on the edge of each.

Existing Capacity

The capacity of the urban areas and existing planning permissions/Local Plan commitments provides for 13,800 new homes over the plan period. For employment, work is currently still progressing to measure the capacity of the urban areas to accommodate employment land. The JCS authorities are critically examining the portfolios of employment land within the urban areas against the requirements to provide a range of employment land including new high-quality employment sites that are attractive to investors. This work will inform the preferred options document in Summer 2012.

It is clear from the work undertaken on the existing capacity that this cannot provide for the estimated requirements set out in the previous section. On this basis, an assessment of the constraints and opportunities in the JCS area was undertaken to identify the most appropriate locations for development on the edge of the urban areas.

Identifying locations on the edge of the urban areas

In order to identify and assess the options for development on the edge of urban areas a study was undertaken referred to as the 'Broad Locations Assessment'. This process involved creating segments around the urban area which could be assessed in terms of constraints and suitability for development. The principal environmental constraints across the area are the locations at risk of flooding and the Area of Outstanding Natural Beauty (AONB). While AONB presents a strong environmental constraint, flood risk is of paramount importance and locations should only be identified in these locations following a sequential test which sets out that there are no other preferable locations. On the basis of these two constraints a limited number of opportunities for development exist on the edge of the urban areas.

The urban areas of Gloucester and Cheltenham are separated by the Green belt, which has the prime purpose of preventing coalescence of these two locations. A Green belt Review has been undertaken to assist the authorities in identifying where areas currently contribute to Green belt functions and where areas could accommodate new development. Given the exceptional circumstances and need to accommodate additional homes and employment in the JCS area, further work on the Green belt will be required to inform preparation of the preferred option.

Following a review of the environmental constraints and opportunities provided by locations surrounding the main urban areas, including sites outside of the JCS area’s administrative boundary to the north of Tewkesbury town (in Wychavon district, South Worcestershire) and south of Gloucester city (in Stroud district) the most sustainable locations to deliver the JCS vision have been identified for potential development in accordance with the preferred development strategy below.

Delivering the strategy

The evidence illustrates that there is a need to deliver new homes, and jobs across the JCS area, particularly affordable new homes against the expected levels of population growth. In order to meet the housing supply requirements a number of sites have been identified for the first part of the plan period (2011 – 2021). However, there is a shortfall in the second part of the plan period (2021 -2031) that also needs to be addressed. The JCS authorities are therefore proposing that the JCS strategy is delivered in two phases:

- Phase 1 for the period 2011 to 2021 to be delivered through strategic allocations⁵ in the JCS and individual local authority future local plan allocations
- Phase 2 for the period 2021 to 2031 to be delivered through strategic broad locations⁶ and housing delivery from strategic allocations continuing on from phase 1.

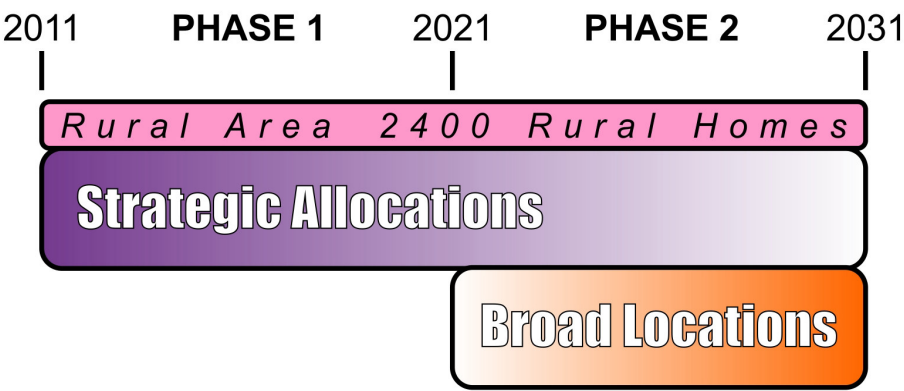


Diagram 2: JCS Phases

⁵ Strategic allocations are significant scale development allocations which are integral to the delivery of the plan.

⁶ Strategic broad locations are broad directions for potential longer term development.

2011 – 2021 phase 1.

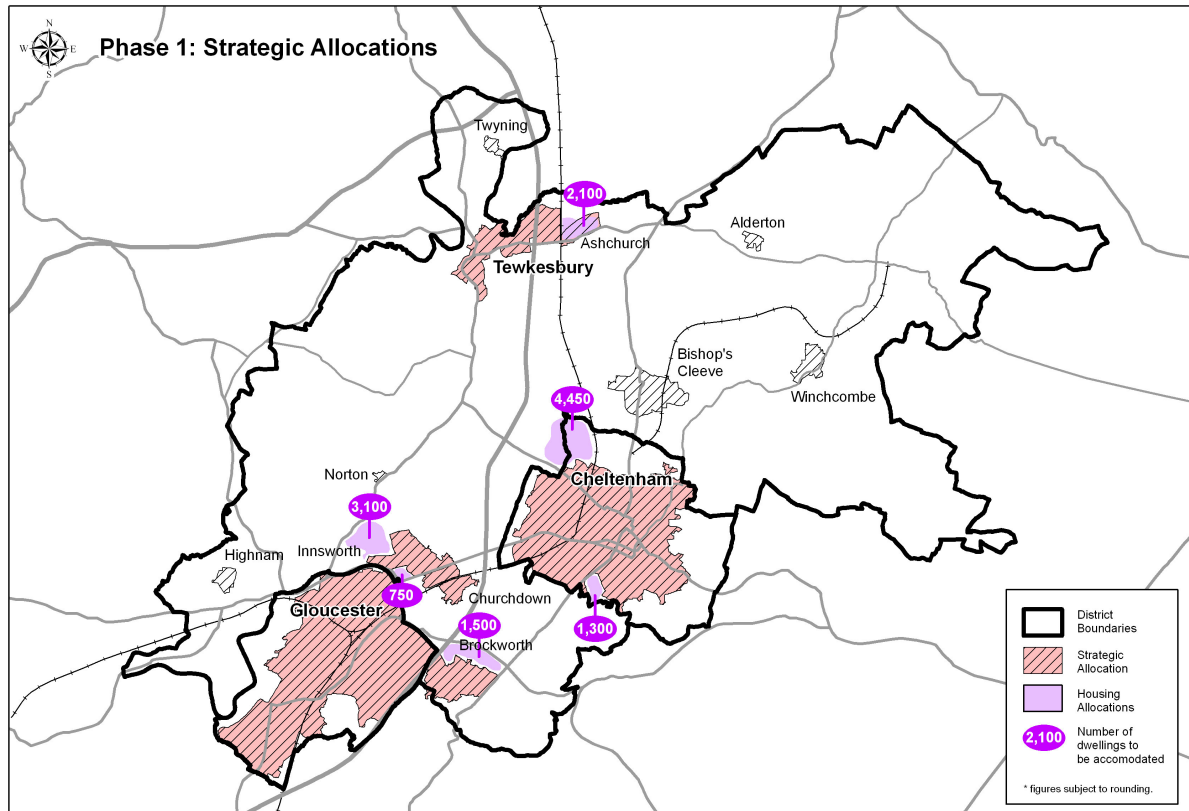
The map below details the strategic allocations during the first ten year period of the plan for the urban areas: Gloucester, Cheltenham and Tewkesbury borough.

Given the need to deliver an ongoing supply of new homes, the JCS authorities have set out a strategy in this document that identifies a number of preferred sites that, along with the urban areas and a proportion (2,400 dwellings) in the rural areas, can deliver 29,500 new homes starting in the first phase of the development plan. This would provide the authorities, individually and jointly with an interim 10 year housing land supply and would make a significant contribution towards meeting housing land supply requirements post 2021.

The 29,500 figure includes existing planning permissions: sites identified as likely to come forward for housing within the existing urban areas: a number of peripheral developments and a figure of 2,400 new homes for the rural area.

These locations have been identified as the most sustainable and suitable locations for development as part of the first phase of the plan and are set out in each of the following scenarios in this section. These have the capacity and potential to deliver new homes and employment in accordance with the development strategy and vision set out in this document. These have been tested with the development industry to ensure that the delivery of this amount of new housing and at these locations is viable.

Although the exact distribution of the 2,400 new homes for the rural area has not been identified by the JCS, a settlement audit has been carried out that identifies those settlements which are most sustainable and may be capable of accommodating further development. We are also seeking views from the public on which settlements would be suitable and whether there is a desire for this level of housing.



Map 1: Phase 1 Strategic Allocations

Joint Core Strategy Strategic Allocations Housing and Employment Numbers

		Homes (No.)	Employment (ha)
Gloucester wider area	Existing planning permissions on the edge of the city	1,900	46
	Gloucester city local plan allocations and planning commitments	6,500	
	Innsworth JCS strategic allocation	3,100	
	Brockworth JCS strategic allocation	1,500	
	Churchdown JCS south strategic allocation	750	
Total Gloucester wider area		13,750	
Cheltenham wider area	Existing planning permissions on the edge of the town	600	
	Cheltenham town local plan allocations and planning commitments	3,700	
	North west Cheltenham JCS strategic allocation (Cheltenham & Tewkesbury	4,450	

	borough)		
	South Cheltenham JCS strategic allocation	1,300	
Total Cheltenham wider area		10,050	
Tewkesbury town wider area	Existing planning permissions in Tewkesbury borough outside of wider policy areas	630	
	Tewkesbury borough local plan Allocations	500	
	Ashchurch JCS Strategic allocation	2,100	
Rural areas		2,400	
Total Tewkesbury borough		5,630	
JCS Total		29,430	
Deficit against scenario B	Requirement 33,200	3,700*	
Deficit against scenario C	Requirement 36,850	7,400*	
Deficit against scenario D	Requirement 40,500	11,000*	

Table 3: Strategic allocations: Housing and employment numbers

2021 – 2031 phase 2.

Whilst these sites would be able to deliver new homes and employment in the first phase of the plan period, they are not themselves sufficient to deliver the full requirement for any of the three housing options presented for consultation and a shortfall exists for each that needs to be identified in the eventual preferred option published in 2012. The shortfall is illustrated below.

Total Homes	Range	Strategic sites and allocations	Approximate shortfall to be found
33,200	-10%	29,500	3,700
36,850	Current local projection of housing need	29,500	7,350
40,500	+10%	29,500	11,000

Table 4: Housing shortfall

This additional development will need to be provided in phase 2 of the plan and the authorities are seeking views on where this should be. The locations that have the potential to accommodate additional development in accordance with the Vision and development strategy of the JCS are set out in the broad locations section of this document, and views are sought on the appropriateness of these.

Upon identification of the most sustainable locations to accommodate further development in phase 2 of the plan, a final housing requirement will be established for each authority in the Preferred Options Document in 2012. The following sections look in more detail at phases 1 and 2.

PHASE 1: STRATEGIC ALLOCATIONS

Development scenarios questions

What amount of new housing and employment land should be provided?

The previous section has set out a range of housing requirements from 33,200 to 40,500 new homes along with a range of employment land requirements. The JCS authorities are seeking your views on what level of housing and employment land should be provided in the JCS area over the plan period.

In order to provide information on the benefits and impacts of providing a range of housing requirements, four scenarios have been prepared to assess the implications of different levels of development. Scenario A identifies the impacts and benefits of not providing any development on the edge of the urban areas and relying upon existing planning permissions and urban sites only but with an additional rural provision for 2,400 new homes. In addition to the provision identified in Scenario A, Scenario B, C and D contain the same strategic site allocations to meet housing requirements for the first ten years of the plan. These Scenarios provide for different levels of housing as set out in Table 2 on Page 20.

Four assessments follow which summarise the impacts and opportunities provided by the four scenarios. These summarise information from the Gloucestershire Affordability Model, and take into account the Sustainability Appraisal work in considering how each scenario performs against the strategic objectives of the JCS.

SCENARIO A

SCENARIO A DELIVERING ONLY EXISTING URBAN AND RURAL CAPACITY (INCLUDING EXISTING PLANNING PERMISSIONS AND ALLOCATIONS) WITH NEW GREENFIELD EXTENSIONS TO THE URBAN AREAS

This scenario is based upon delivering development over the plan period but only within the built up areas of Gloucester, Cheltenham and Tewkesbury together with some development in rural villages. It relies solely on the capacity of the urban areas to deliver new homes based upon sites that already have planning permission, existing allocated sites and sites identified in the urban areas that are considered deliverable following an assessment of their suitability.

The emphasis of this scenario is to provide only new homes in the urban area and not bring forward new greenfield sites on the edge of the urban areas for development, including Green Belt land. This scenario would deliver 16,200 new homes over the plan period.

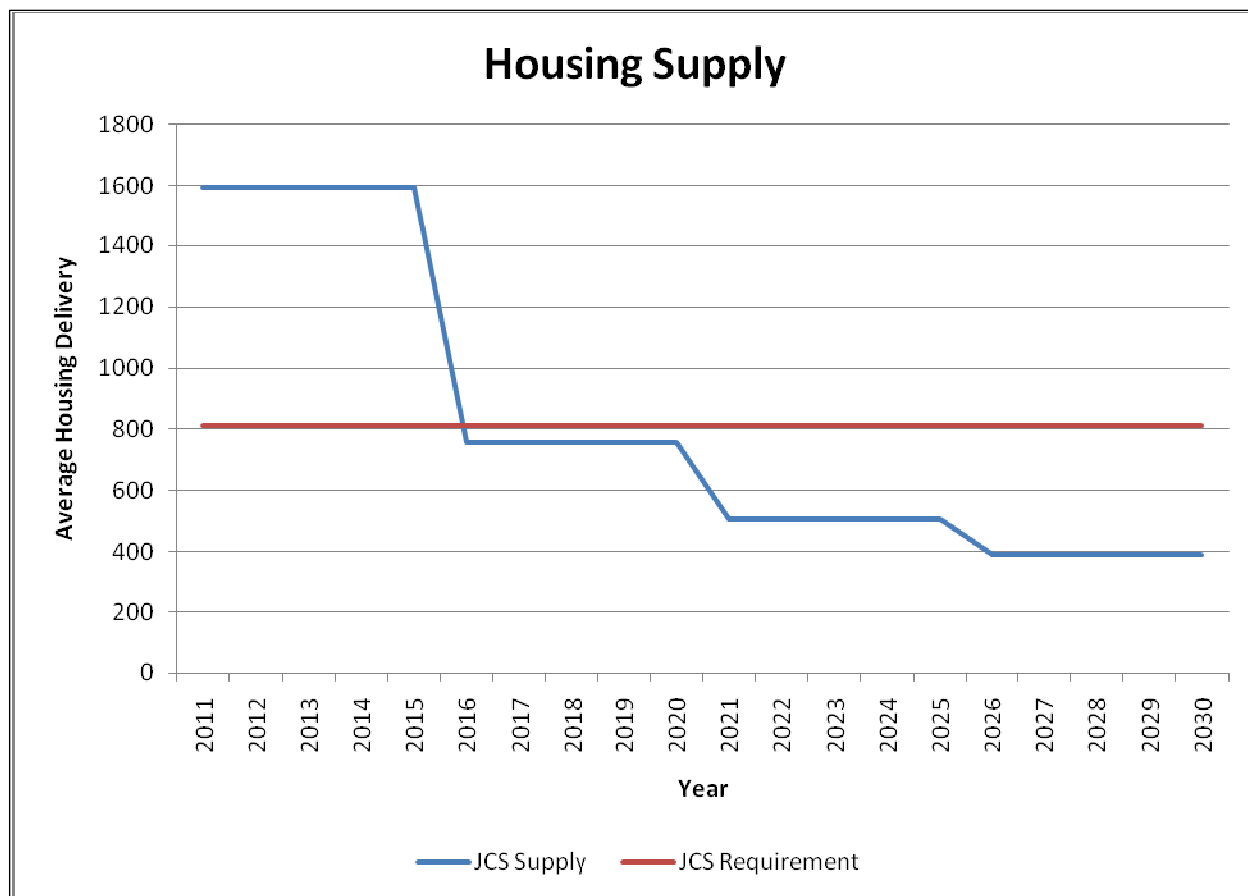
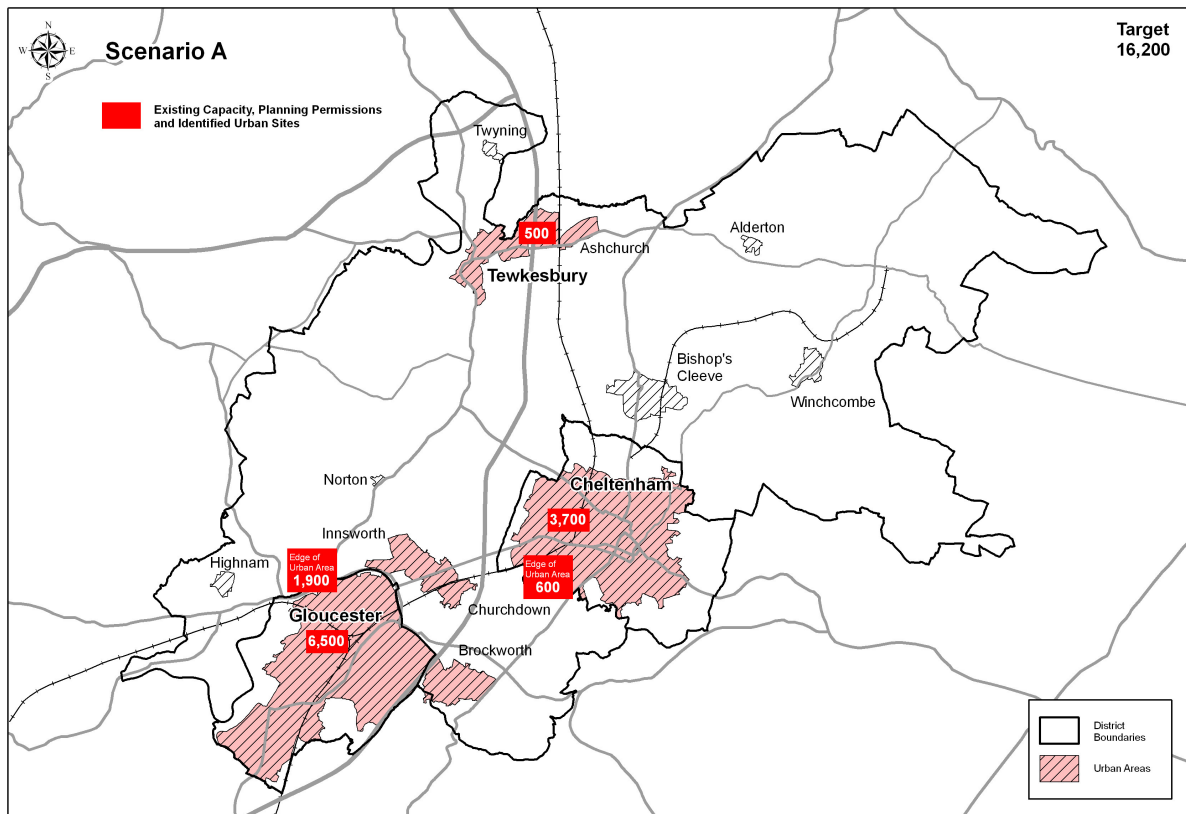


Diagram 3: Scenario A housing supply



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Map 2: Strategic allocations scenario A

Implications identified by Gloucestershire Affordability Model

This scenario would provide a total of 16,200 new homes across the JCS area in association with at least 46ha of employment land. The impacts of this option are particularly acute in that the housing market in the JCS area might fail and the authorities could experience people leaving the JCS area due to the lack of new homes and the ability to find jobs and better economic conditions elsewhere. The housing market could suffer in that i. Overcrowding might increase, ii. There would be a significant lack of choice of properties, iii. In that people would be priced out of the housing market, and iv. The need for affordable homes could rise.

Typically those leaving the area are predicted to be aged 25 to 59 which comprises the main proportion of the workforce. The effects of this scenario are particularly strong in Cheltenham where the loss of people in this age group will be experienced early in the plan period. Tewkesbury and Gloucester are also affected by this loss of this section of the population. In Gloucester the severity of the decline in the latter parts of the plan period is stronger given the high level of young people reaching a point at which they wish to access the property market and not being able to do so.

Those people that stay in the JCS area are predominantly over 60, including the less mobile ageing proportion of the population. As a whole, the area would see a rise of 84% of people aged 60 years or older. This would place a significant requirement for an increased proportion of new homes to be specialist care or sheltered accommodation.

With a significant out migration of people from the JCS area in the main working age proportion of the population, in addition to virtually no rise in the number of children due to younger families moving away, the impacts on the ability of the JCS area to compete economically are seriously undermined.

JCS Objective		Commentary
1. Address the causes and consequences of climate change	AMBER	This scenario would have advantages in not building upon new Greenfield land and restricting the amount of land lost to development but could result in a significant loss of population of the working age group. This would increase commuting and congestion.
2. Manage and reduce flood risk	AMBER	This scenario would only develop land within the existing urban areas over Greenfield sites. However with an emphasis of maximising development in the urban areas, there may be pressure to provide additional housing as part of exception tests in urban areas of known flooding.
3. Allocate strategic development in support of sustainable urban and rural communities and the conservation of strategic open space	RED	This scenario does not allocate strategic development.
4. Conserve the built environment	RED	With pressures to deliver in urban area, all available space will need to be maximized. This would lead to higher density development at levels which will not be acceptable, nor attractive to the market. It is therefore highly unlikely that high density development will come forward.
5. Conserve and improve the natural environment	GREEN	This scenario would only develop land within the existing urban areas over Greenfield sites.
6. Foster economic growth	RED	This option results in the outmigration of the key working age group out of the JCS area with 83% of growth being people of 60+. The workforce will be ageing and no limited workers will be available. Land for employment uses will also be limited and under pressure for uses such as housing.
7. Provide for sufficient homes	RED	In this scenario people move away from the area due to overcrowding, lack of affordability, insufficient homes and better economic prospects elsewhere. This results in issues of affordability and rising annual housing need means this scenario does not meet need for new homes.
8. Address social inequality, inclusivity and community health/safety	RED	This scenario could see a rise in overcrowding and unsuitable housing. It will not deliver a range of housing types to meet the requirements of the JCS population
9. Improve skills and educational attainment	RED	There is an outmigration of the skilled workforce and along with it in the later periods of the plan a decline in young people. In addition to this people educated and trained here will not be able to access the

JCS Objective		Commentary
		housing market and will need to either commute or find employment elsewhere.
10. Increase access to jobs/services (via sustainable transport modes)	AMBER	This focus on accommodating development within the urban areas but an increase in commuting from outside the JCS area is likely.
<i>Table 5: Will Scenario A deliver the JCS strategic objectives?</i>		

SCENARIO B

SCENARIO B: PROVIDING NEW HOMES FOR APPROXIMATELY 10% LESS THAN THE ESTIMATED HOUSING REQUIREMENT THROUGH SITE ALLOCATIONS (AND BROAD LOCATIONS).

REQUIREMENT: 33,200 new dwellings and min point of 46ha employment land

DEFICIT TO BE FOUND: 3,700 Dwellings

This scenario seeks to maximise the delivery of sites within the urban areas and provide strategic allocations on the edge of the urban areas in accordance with the Development Strategy for the JCS. The overall requirement for this scenario is 33,200 new dwellings. Given that the urban areas, strategic sites and the rural area can provide for 29,500 new homes, the deficit to be found within Broad Locations is approximately 3,700 dwellings.

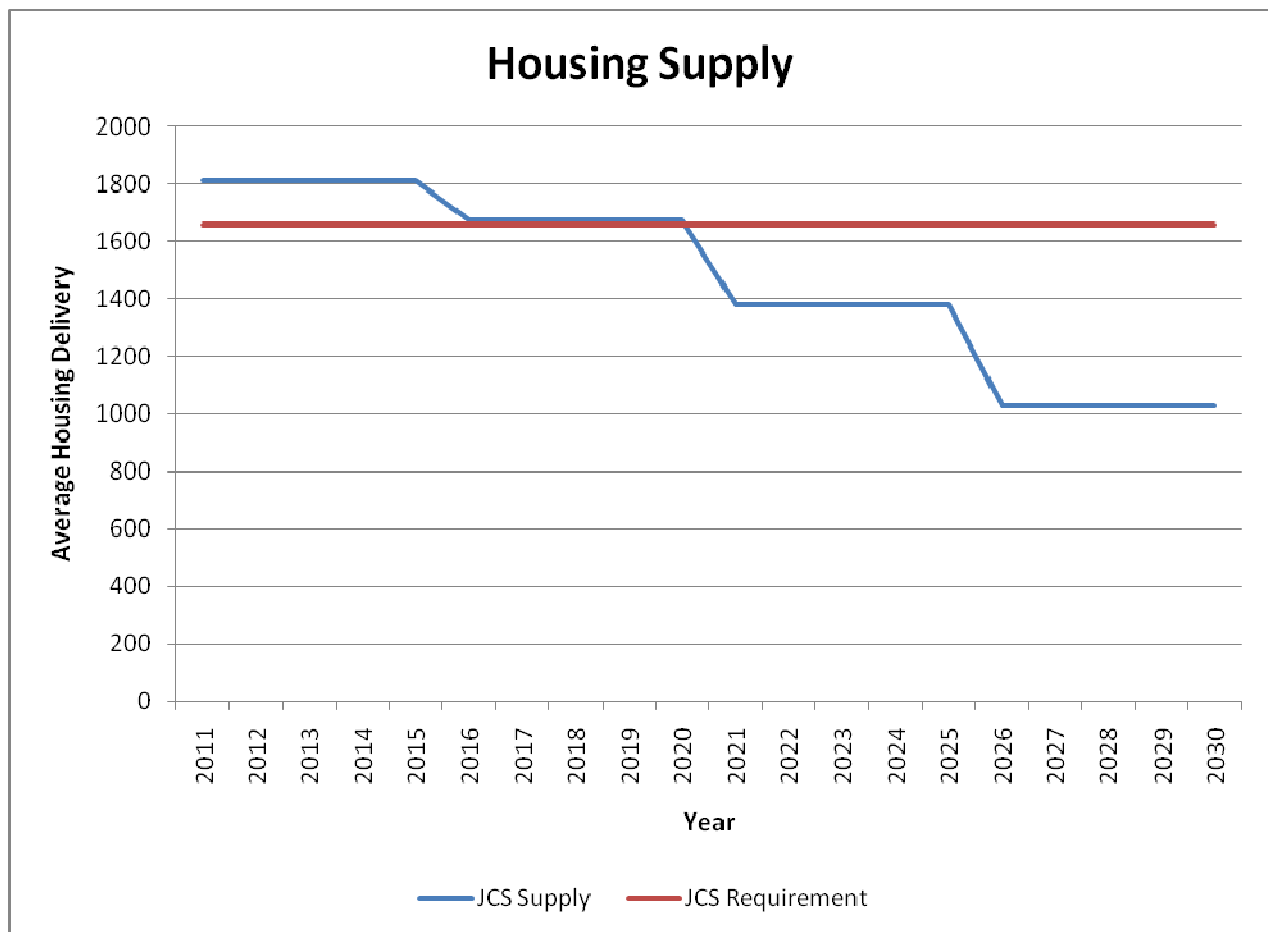
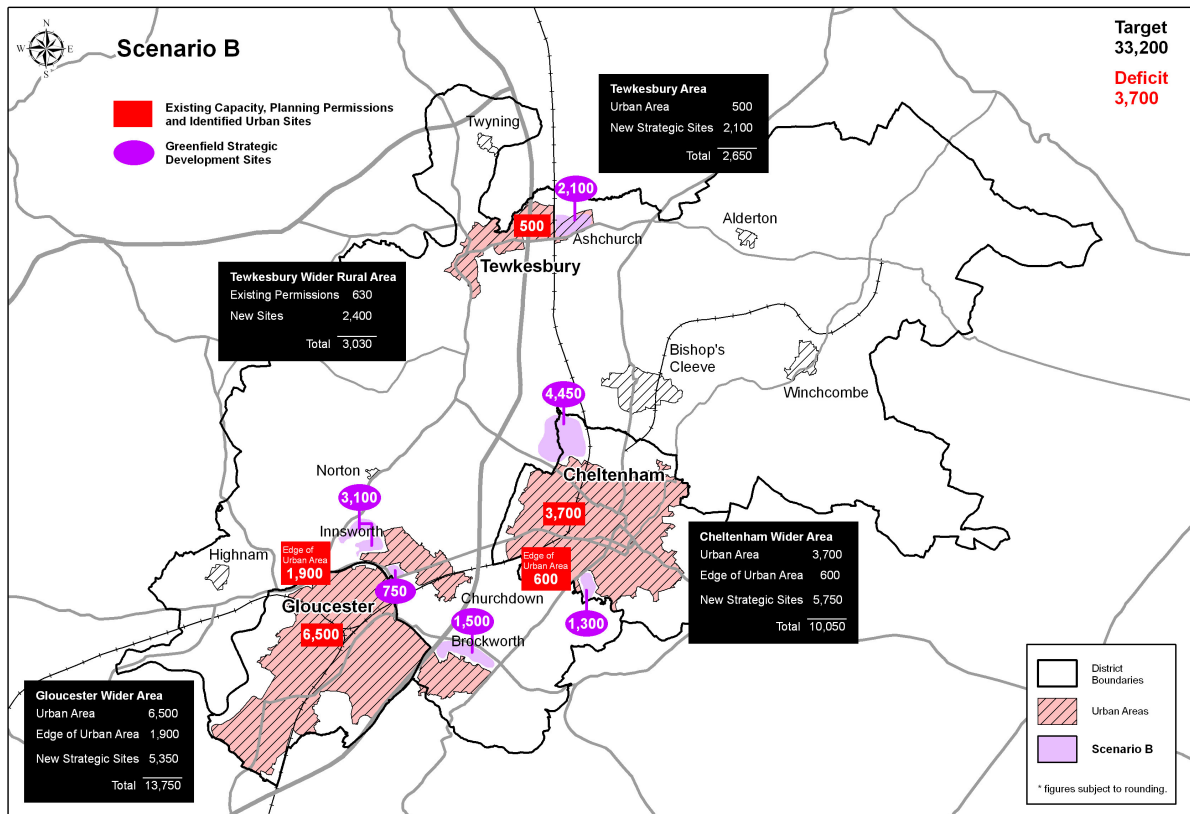


Diagram 4: Scenario B housing supply



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Map 3: Strategic sites scenario B

Initial implications identified by Gloucestershire Affordability Model

This scenario performs significantly better than scenario A in that more homes are provided in the JCS area to meet the demands of people in the early period of the plan, however there is still a loss of population towards the end of the plan period. The profile of people leaving the JCS area in this scenario is still the main working age group of 25 to 59. Of note is that in this scenario this trend is only experienced in Cheltenham and Tewkesbury with Gloucester seeing a rise in this age band. The population loss from Cheltenham is particularly acute and is experienced early in the plan period.

With families moving away, those over 60 years of age form the largest proportion of growth in this scenario. The trend implies that people are growing up in the JCS area as part of family groups but then leaving the area when there is a need to leave home. There is an issue of fewer children being present in Cheltenham in future years as a result of people moving away and the population ageing.

The JCS area still experiences a shortage in housing supply with overcrowding present and properties being unaffordable. The housing market is improved in Gloucester and Tewkesbury with vacancy rates in the market returning to normal levels. This illustrates the housing market is performing well, however, Cheltenham's rate still remain severely low and stagnation of the market is predicted. As a result people will find it difficult to upscale or downsize their property in Cheltenham and are likely to need to move outside of the areas to engage in the property market.

Economically and in particular Cheltenham and Tewkesbury will struggle to compete with the loss of a key sector of its working age population.

The Gloucestershire Affordability Model has indicated, however, that should Gloucestershire become more competitive economically and provide a greater range of opportunities for jobs there is a greater retention of people within the JCS area, particularly in Cheltenham and Tewkesbury in the working age band of 25 to 59. With greater economic performance Cheltenham and Tewkesbury still experience a decline in the working age group but not as severe as an uncompetitive JCS area would experience. Gloucester City on the other hand experiences a greater rise in population with better economic conditions in this scenario. However, with better economic performance and the retention of people, the housing market still struggles to perform in Cheltenham with the vacancy rate being extremely low. Gloucester's housing market along with Tewkesbury's performs well, however, with the greater retention of people there are significant demands for property and affordability worsens. This scenario therefore experiences problems with affordability and housing supply with a greater retention of people.

Will scenario B deliver the JCS strategic objectives?

JCS Objective		Commentary
1. Address the causes and consequences of climate change	AMBER	This scenario does include areas of Greenfield land as strategic locations but avoids areas of flooding. It could, however, still result in a significant loss of population from Cheltenham and Tewkesbury in the working age group. This would increase commuting thereby increasing the impacts of climate change by emissions.
2. Manage and reduce flood risk	GREEN	This scenario avoids areas of flood risk in identifying strategic allocations in the JCS. There is also a requirement to consider water management in new development proposals.
3. Allocate strategic development in support of sustainable urban and rural communities and the conservation of strategic open space	AMBER**	This scenario allocates mixed use strategic development but does still not provide a solution to addressing the issue of people in Cheltenham and Tewkesbury from leaving the JCS area in search of more affordable housing. However with greater economic prosperity it should retain more people and slow down population loss.
4. Conserve and improve the built environment	GREEN	This scenario identifies an appropriate level of development to support the urban areas and avoid the need to rely on higher density development. New development on the edge of the urban areas should be well integrated to existing developed areas.
5. Conserve and improve the natural environment	AMBER	This scenario will result in the loss of green field land but areas of high landscape value are avoided. There will be some loss of high grade agricultural land. This scenario provides for potential improvement areas.
6. Foster economic growth	AMBER**	This option will only achieve positive results in terms of retaining key sectors of the workforce is the JCS area becomes competitive economically. Without this, the JCS area will experience some loss of its population which will affect the economic performance of the area.
7. Provide for sufficient homes	AMBER**	Local housing need is significantly improved over Scenario A. This scenario increases the level of housing provision but there is unmet demand for affordable homes.
8. Address social inequality, inclusivity and community health/safety	GREEN	Strategic allocations will be required to be supported by appropriate community infrastructure.

JCS Objective		Commentary
9. Improve skills and educational attainment	AMBER**	This scenario will see some loss in the working age population and associated skilled people. Appropriate provision will be made for education facilities.
10. Increase access to jobs/services (via sustainable transport modes.	GREEN	The strategic allocation locations are identified in areas of that offer the best opportunities for sustainable travel and make use of existing infrastructure networks.
<i>Table 6: Will scenario B deliver the JCS strategic objectives?</i>		

SCENARIO C

SCENARIO C: PROVIDING NEW HOMES TO MEET THE ESTIMATED HOUSING REQUIREMENT THROUGH SITE ALLOCATIONS (AND BROAD LOCATIONS).

REQUIREMENT 36,850 new dwellings and mid point of 46ha employment land

SHORTFALL TO BE FOUND 7,400 Dwellings

This scenario seeks to maximise the delivery of sites within the urban areas and provide strategic allocations on the edge of the urban areas in accordance with the Development Strategy for the JCS. The overall requirement for this scenario is 36,850 new dwellings. Given that the urban areas, strategic sites and the rural area can provide for 29,500 new homes, the deficit to be found within Broad Locations is approximately 7,400 dwellings.

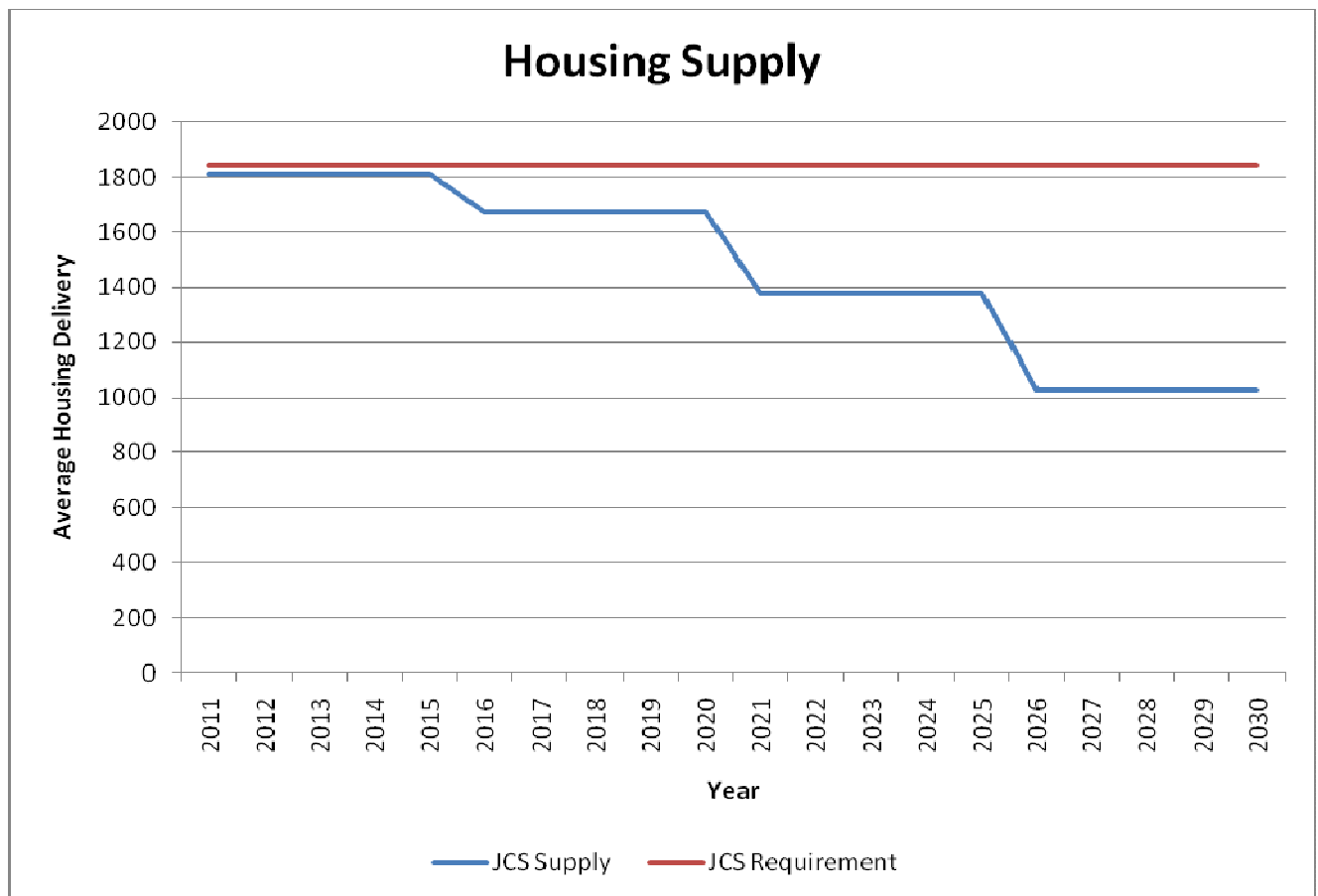
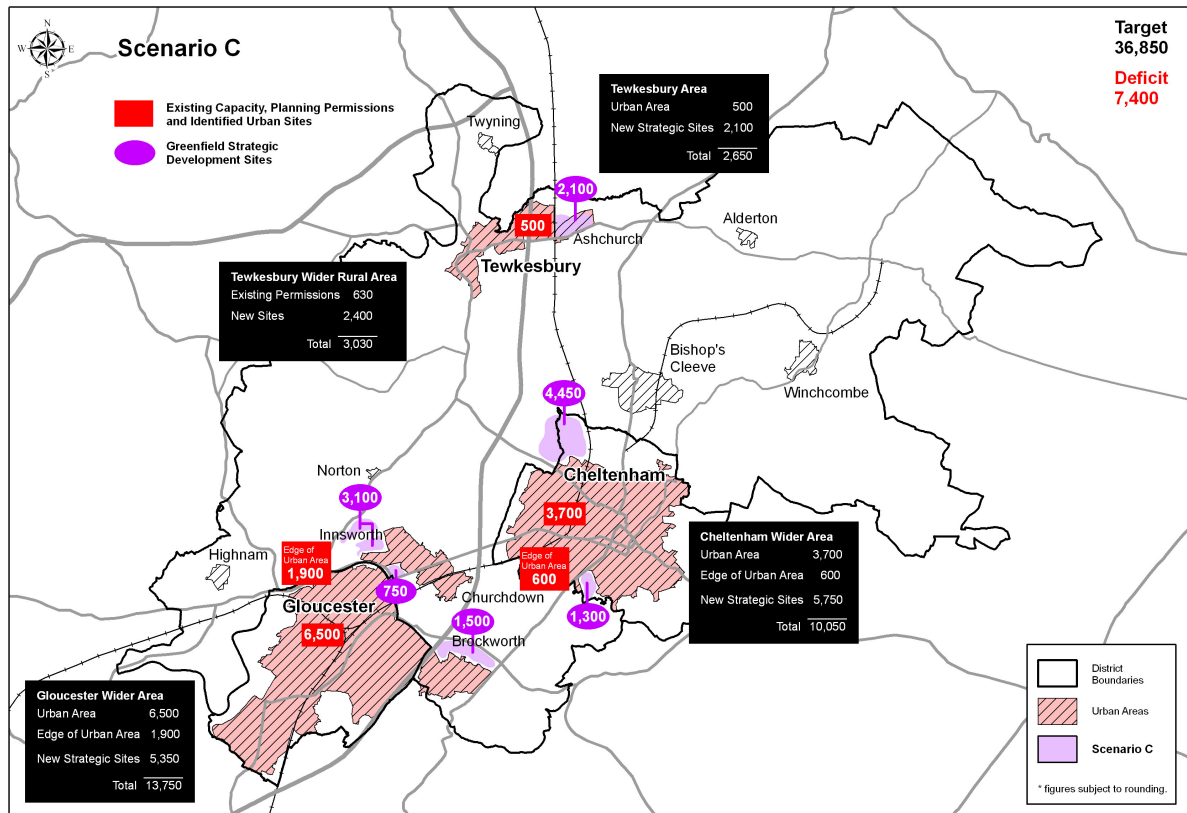


Diagram 5: Scenario C housing supply



Map 4: Strategic sites scenario C

Implications identified by Gloucestershire Econometric Model

Similarly to Scenario B, this scenario provides more positive results over scenario A in that more homes are provided in the JCS area to meet the demands of the local population. However, this scenario still experiences a loss of population towards the end of the plan period and is again driven by people leaving Cheltenham. People leaving the JCS area in this scenario, in the working age group 25 to 59 are mainly from Cheltenham and Tewkesbury whereas Gloucester sees a gain in population in this age band. With younger families moving away, those over 60 will form the largest proportion of growth in this scenario, similar to Scenario B.

The evidence illustrates that with additional houses alone in this scenario, the out migration is only marginally reduced and that the economy is an important factor in dealing with this issue. As with Scenario B, the evidence illustrates that if the JCS area becomes more competitive, it will then retain a greater proportion of its working age population. Scenario C therefore could perform better than scenario B as there are additional new homes being provided which can provide for an improved economic performance of the area and the subsequent demands for new homes.

In summary therefore, this option performs better than scenario B.

Will Scenario C deliver the JCS strategic objectives?

JCS Objective		Commentary
1. Address the causes and consequences of climate change	AMBER	This scenario does include areas of Greenfield land as strategic locations but avoids areas of flooding. It would, however, require additional greenfield development to accommodate the shortfall. There is reduced outflow of working age population which should reduce commuting and therefore emissions. This would scenario would perform marginally better than scenario B.
2. Manage and reduce flood risk	GREEN	This scenario avoids areas of flood risk in identifying strategic allocations in the JCS. There is also a requirement to consider water management in new development proposals. This scenario would also avoid areas of flood risk even with the additional homes.
3. Allocate strategic development in support of sustainable urban and rural communities and the conservation of strategic open space	GREEN**	Without an economic focus to the JCS, this scenario still results in the issue of people in Cheltenham and Tewkesbury leaving the JCS area in search of more affordable housing. However with greater economic prosperity it should retain more people and slow down population loss and creation of more balanced communities.
4. Conserve and improve the built environment	GREEN	This scenario identifies an appropriate level of development to support the urban areas and avoids the need rely on higher density development. The additional development under this scenario on the edge of the urban areas should be well integrated to existing developed areas.
5. Conserve and improve the natural environment	AMBER	This scenario will result in the loss of green field land but areas of high landscape value are avoided. There will be some loss of high grade agricultural land. This scenario provides for potential improvement as with the previous scenario but would require additional Greenfield land for development. Addressing the shortfall would result in additional greenfield land being required but areas of lowest value would be considered above those of higher importance.
6. Foster economic growth	AMBER**	This option will only achieve positive results in

JCS Objective		Commentary
		terms of retaining key sectors of the workforce if the JCS area becomes competitive economically. Without this, the JCS area will experience some loss of its population which will affect the economic performance of the area. Higher levels of new homes provided in this option will support the economic potential of the area to a greater degree than previous scenarios.
7. Provide for sufficient homes	AMBER **	Local housing need is significantly improved over Scenario B, however, with a more competitive JCS area, there would be an increase in the number of people that seek to remain in the area. This will place pressure on the need for new homes. This scenario increases the level of housing provision but there is still a high level of demand for affordable homes.
8. Address social inequality, inclusivity and community health/safety	GREEN **	Strategic allocations will be required to be supported by appropriate community infrastructure. Under this scenario there would be greater potential to retain workforce and families, giving better balanced communities.
9. Improve skills and educational attainment	AMBER **	This scenario will see some loss in the working age population and associated skilled people. Appropriate provision will be made for education facilities. This scenario performs marginally better than scenario B.
10. Increase access to jobs/services (via sustainable transport modes)	GREEN	The strategic allocation locations are identified in areas of that offer the best opportunities for sustainable travel and make use of existing infrastructure networks.

** is only this score if the JCS becomes economically competitive and seeks to retain a greater proportion of its working age population by promoting economic growth. Should this not be the case the score will be different as described in the accompanying text.

Table 7: Will Scenario C deliver the JCS strategic objectives?

SCENARIO D

SCENARIO D: PROVIDING NEW HOMES FOR 10% HIGHER THAN THE ESTIMATED HOUSING REQUIREMENT THROUGH SITE ALLOCATIONS (AND BROAD LOCATIONS).

REQUIREMENT 40,500 new dwellings and minimum of 46ha employment land

SHORTFALL TO BE FOUND 11,000 Dwellings

This scenario seeks to maximise the delivery of sites within the urban areas and provide strategic allocations on the edge of the urban areas in accordance with the Development Strategy for the JCS. The overall requirement for this scenario is 40,500 new dwellings. Given that the urban areas, strategic sites and the rural area can provide for 29,500 new homes, the shortfall to be found within Broad Locations is approximately 11,000 dwellings.

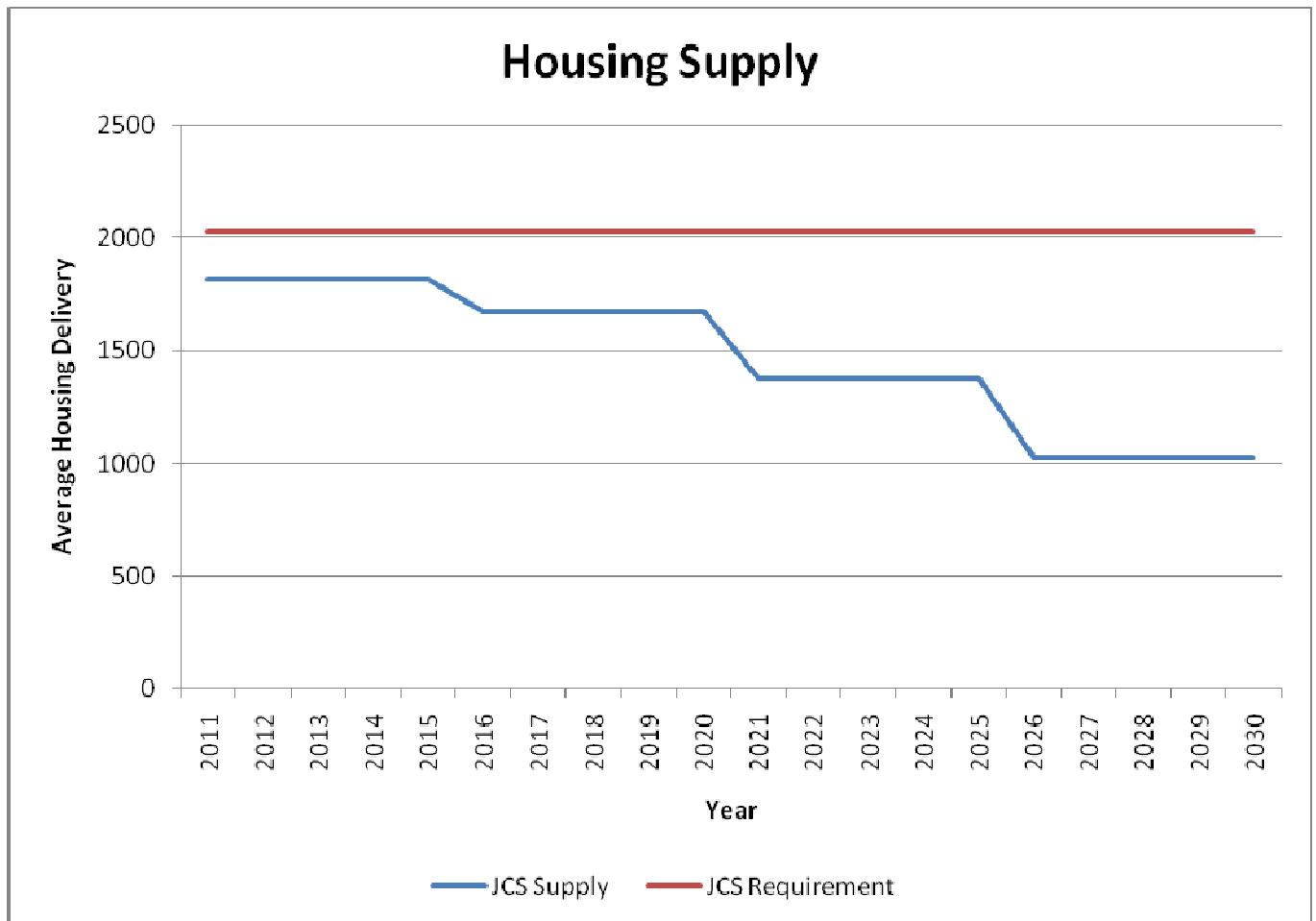
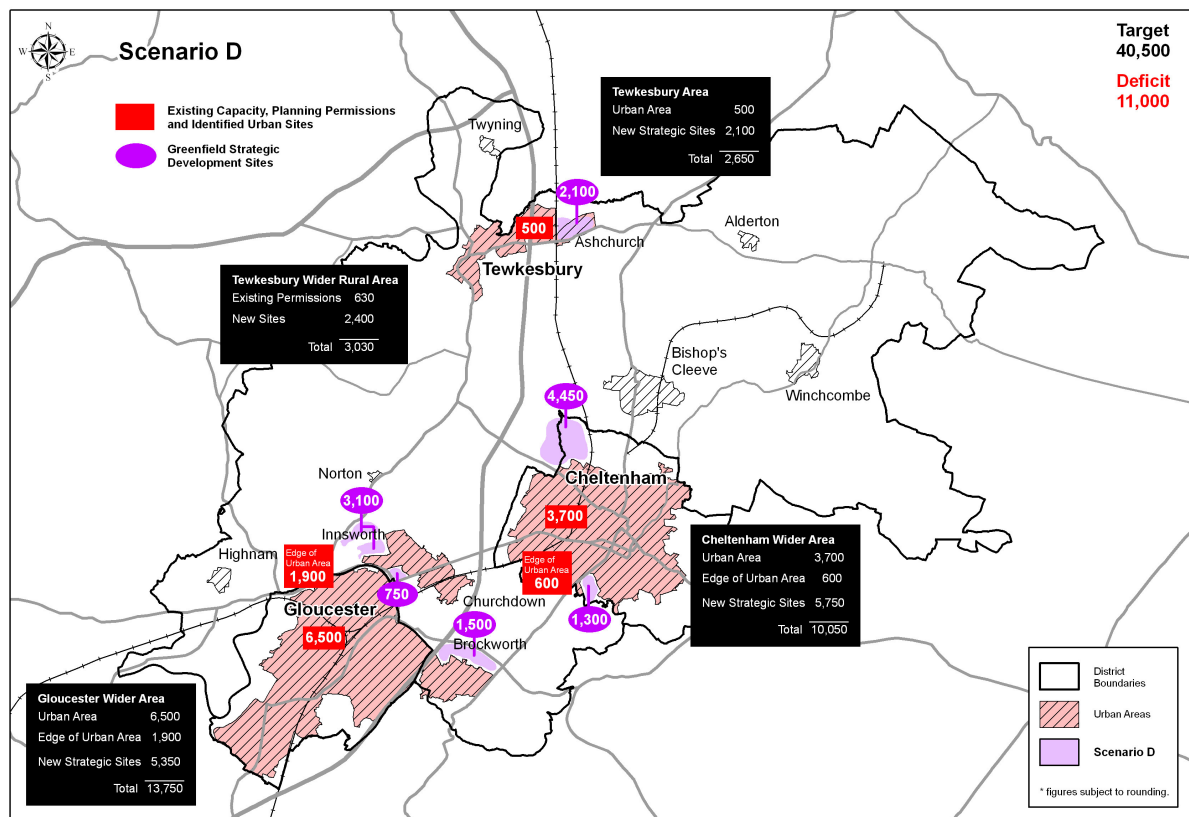


Diagram 6: Scenario D housing supply



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Map 5: Strategic sites scenario D

Implications identified by Gloucestershire Econometric Model

This scenario shows similar trends to that of B and C when additional housing is considered in isolation from economic performance. The scenario does, however, illustrate the importance of delivering economic prosperity alongside new homes. This is because higher levels of new house building without jobs could also lead to housing market failure.

The evidence from this scenario illustrates that with higher levels of homes in the JCS area combined with an uncompetitive job market the provision of new homes could lead to high vacancy rates being experienced in Tewkesbury and Gloucester resulting in more vacant properties on the market than is healthy.

With higher economic competitiveness in the JCS area, this option could perform better than scenario C but it performs far better due to the additional housing provided, meeting the demands for people wishing to stay within the area. The need for affordable homes is better than that in scenario C, however, there could still be a loss in the working age group between 25 and 59 from Cheltenham and a potential significant growth in the population of Gloucester. This suggests that Gloucester is not only retaining its population but may be accommodating population from Cheltenham due to lower house prices.

Will Scenario D deliver the JCS strategic objectives?

JCS Objective		Commentary
1. Address the causes and consequences of climate change	AMBER	This scenario does include areas of Greenfield land as strategic locations but avoids areas of flooding. It would, however, require more greenfield development than scenarios B and C to accommodate the shortfall.
2. Manage and reduce flood risk	AMBER	This scenario continues to avoid areas of flood risk in identifying strategic allocations. There is also a requirement to consider water management in new development proposals. Greater levels of development than under scenarios B and C. There should still be sufficient land within flood zone 1 but clearly greater pressure for development in higher risk areas than under scenarios B or C.
3. Allocate strategic development in support of sustainable urban and rural communities and the conservation of strategic open space	AMBER**	Without an economic focus to the JCS, this scenario still results in the issue of people in Cheltenham and Tewkesbury leaving the JCS area in search of more affordable housing. However, with greater economic prosperity it should retain more people and slow down population loss and creation of balanced communities, but may lead to additional rural development.
4. Conserve and improve the built environment	AMBER	This scenario may require additional development to be provided in the urban areas at higher densities, in addition to the pressure on rural areas above.
5. Conserve and improve the natural environment	AMBER	This scenario will result in the loss of green field land but areas of high landscape value are avoided. There will be some loss of high grade agricultural land. This scenario provides for potential improvement as with the previous scenario but would require additional Greenfield land for development. Addressing the shortfall would result in additional greenfield land being required but areas of lowest value would be considered above those of higher importance.
6. Foster economic growth	GREEN**	This option will only achieve positive results in terms of retaining key sectors of the workforce if the JCS area becomes competitive economically. Without this, the JCS area will experience some loss of its population which will affect the economic performance of the area. Higher levels of new homes provided in this option will support the economic potential of the area to a greater degree than

JCS Objective		Commentary
		previous scenarios.
7. Provide for sufficient homes	GREEN**	This option provides the best scenario for addressing the need for affordable homes. It can provide homes for a larger proportion of all sectors of the market including private and affordable homes and greater choice.
8. Address social inequality, inclusivity and community health/safety	GREEN**	This scenario provides an even greater opportunity than the other scenarios for homes to address housing need and with a greater retention of the workforce there are opportunities for people to generate wealth through jobs.
9. Improve skills and educational attainment	GREEN**	This scenario will see some loss in the working age population and associated skilled people. Appropriate provision will be made for education facilities. This scenario performs marginally better than scenario C.
10. Increase access to jobs/services (via sustainable transport modes)	AMBER	The strategic allocation locations are identified in areas of that offer the best opportunities for sustainable travel and make use of existing infrastructure networks. However it may be harder to accommodate all the development at similarly sustainable locations.

** is only this score if the JCS becomes economically competitive and seeks to retain a greater proportion of its working age population by promoting economic growth. Should this not be the case the score will be different as described in the accompanying text.

Table 8: Will Scenario D deliver the JCS strategic objectives?

PHASE 2: OPTIONS FOR DEVELOPMENT 2021 – 2031 (BROAD LOCATIONS)

As set out in the previous development strategy section, each of scenarios B, C and D currently include a shortfall of housing to 2031 as shown below. In order to establish how the shortfall for each of these scenarios could be met, three themes have been identified for consultation.

The current scenario shortfall figures are:

	Requirement for new homes	Range	Current phase 1 delivery	Deficit required
Scenario B	33,200	-10%	29,500	3,700*
Scenario C	36,850	Current local projection of housing need	29,500	7,350*
Scenario D	40,500	+10%	29,500	11,000*
<i>* figures rounded</i>				

Table 9: Scenario deficit Scenario A is not included as it has no shortfall nor is it a sound alternative to pursue.

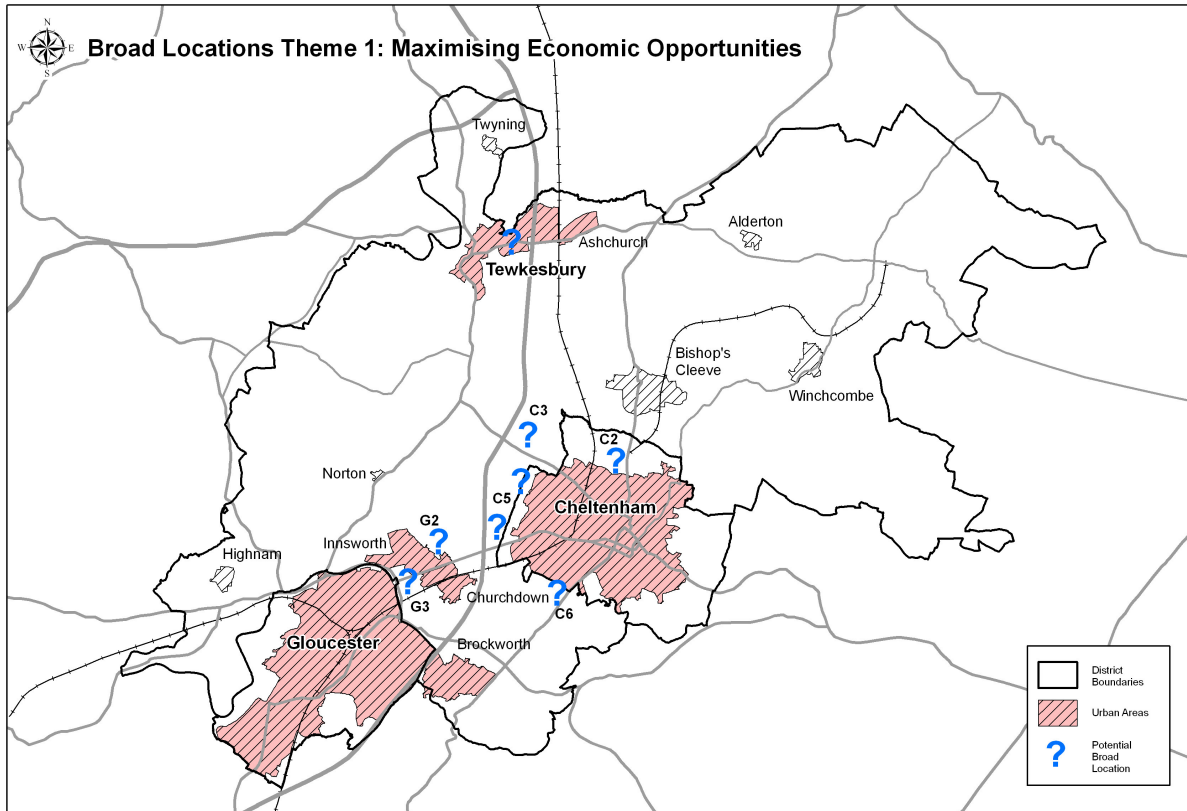
The shortfalls are proposed to be addressed through one of the themes below:

1. Maximising economic opportunities
2. Protect the Green belt to prevent the coalescence of Gloucester and Cheltenham and Cheltenham and Bishop's Cleeve, or
3. Make the best use of existing infrastructure

Additional work will be carried out as part of preparing the development of the preferred option. Each of the themes are outlined and illustrated below for consideration. To accommodate the shortfalls there may be a need to consider solutions in discussion with other authorities beyond the JCS area.

THEME 1: Maximising economic opportunities

This theme continues the existing development strategy of fostering economic growth and providing new housing and employment land in locations that have the best opportunities for both creating jobs, and providing those jobs near large areas of population to minimise the need for commuting. It also looks to place employment land and housing in the most accessible of locations to reduce the need for additional infrastructure. Under this option Gloucester and Cheltenham areas would continue to provide the majority of development on the edge of the urban areas for both employment and housing with limited new development elsewhere in Tewkesbury Borough.



Map 6: Theme 1 Maximising Economic Growth

Cheltenham

A new business park could be provided as an addition to the development of north west Cheltenham at Junction 10 of the M5 motorway. This could be located adjacent to Cheltenham and deliver the objective of promoting employment land adjacent to the main urban areas. The limited movements available at Junction 10 of the M5 may, however, reduce the advantage of this location unless remodelling of the junction is achievable.

There is also an opportunity to consider employment land to the west of Cheltenham adjacent to the town and between the A40 and the B4063. This is a substantial location and could be considered for an additional business park and residential uses. Access arrangements onto the A40 may constrain the accessibility of this site, however, similar to the above broad location it is located adjacent to Cheltenham.

New housing development could be provided to the south of Cheltenham extending the urban area southwards while still protecting the important gap between Cheltenham and Shurdington. Another possible location is to the north of the town, which offers the potential to provide new homes adjacent to the existing town and areas of potential new employment, services and facilities.

Gloucester

An opportunity for additional employment land within this location is the area of land at Elmbridge Court between the A40 and the existing railway line. This could provide the opportunity for a new business park adjacent to the existing urban area. This site could make use of existing infrastructure and could link to the Elmbridge park and ride scheme.

There is an opportunity to investigate further residential development to north of Churchdown and to the north of Innsworth.

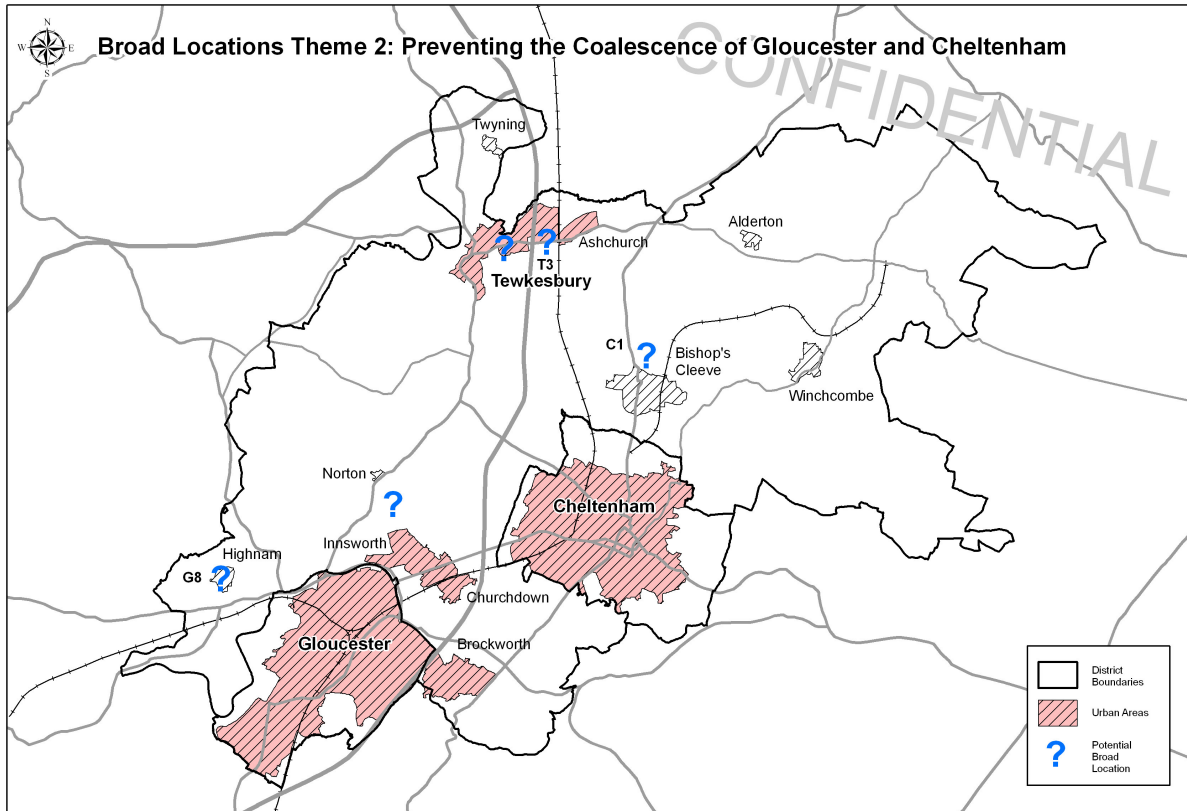
Gloucester/Cheltenham airport could provide additional economic opportunities. This is close to existing areas of population and workforce as well as existing infrastructure.

Tewkesbury town

Additional employment land and housing land would be limited under this option at Tewkesbury town where the focus is upon the principal settlements of Gloucester and Cheltenham.

THEME 2: Preventing the coalescence of Gloucester, Cheltenham and Bishop's Cleeve

This theme seeks to maintain green belt Boundaries that ensure that Gloucester, Cheltenham and Bishop's Cleeve do not coalesce. This could include options beyond the JCS area, to be explored further with adjoining planning authorities. Under this option further development into the green belt between Gloucester, Cheltenham and Bishop's Cleeve would be restricted and additional development distributed to locations beyond the green belt. This could include further development at Tewkesbury town and the key rural settlements within close proximity to Gloucester and Cheltenham in accordance with the overarching strategy of promoting an economic led strategy.



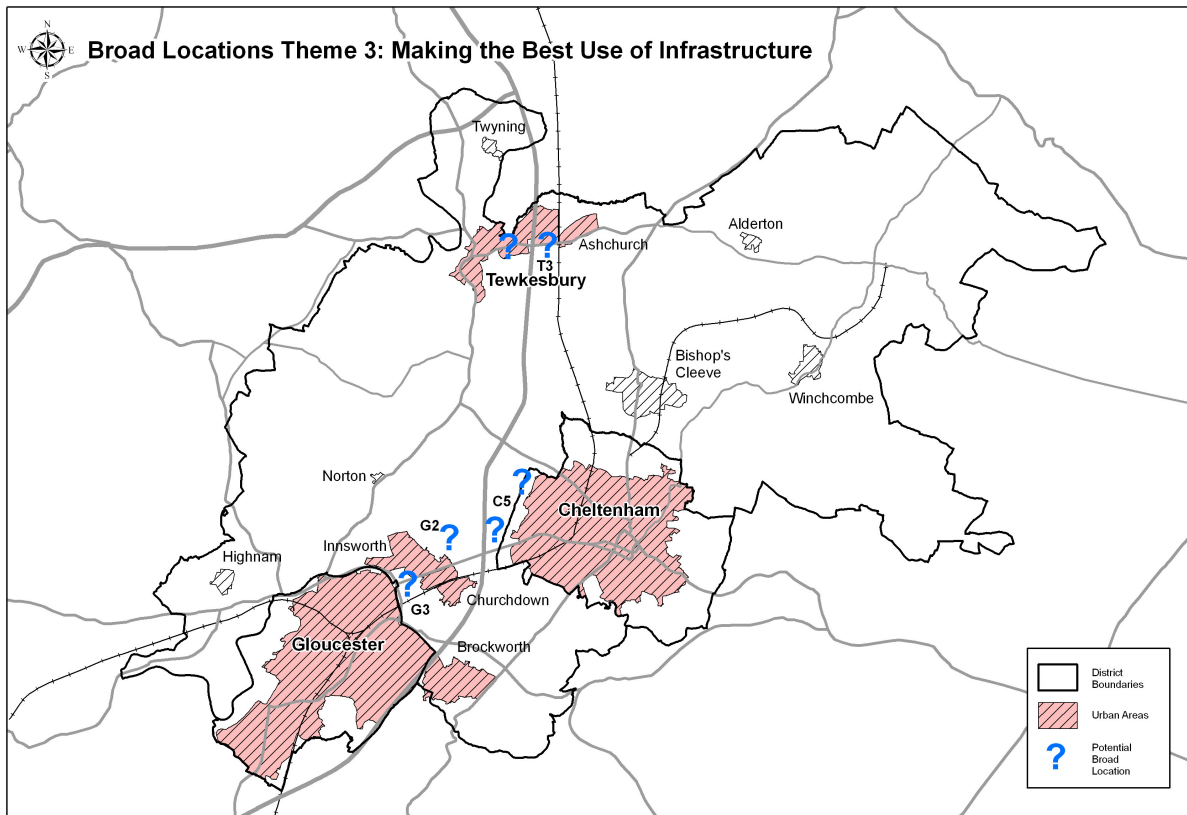
Map 7: Theme 2 Preventing the coalescence of Gloucester and Cheltenham

Locations that are considered under this theme include Highnam and Bishop's Cleeve which could provide additional homes given their proximity to Gloucester City and Cheltenham respectively.

Tewkesbury town may also need to play a larger role in this scenario and there are opportunities for additional development to the north and east of the town that area away from existing areas of flooding. Additional employment land could be provided to the south of Tewkesbury town/Ashchurch away from existing areas of flooding.

THEME 3: Making the best use of existing infrastructure

This theme focuses on locating development where the existing infrastructure and facilities are available and can reduce the need for additional investment. This is particularly important given that funding for infrastructure may be even more difficult to obtain in future. This theme will be informed by where spare capacity exists on current networks and where the opportunities to provide new infrastructure are best. This will be informed by the work on the JCS Infrastructure Plan.



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Map 8: Theme 3 Making the best use of infrastructure

The focus of locations in this theme is the settlements of Gloucester, Cheltenham and Tewkesbury. There is correlation between this theme and the theme maximising economic opportunities. However, this could mean a greater focus of development in locations between Cheltenham and Gloucester.

In this context the employment locations at west Cheltenham and at Elmbridge could provide the best opportunities given that the location at north west Cheltenham would require costly junction modifications to Junction 10 of the M5 motorway. Additional land could also be provided at Tewkesbury town to maximise the opportunities of access to Junction 9 of the M5 motorway.

Residential development could in principle also follow the same focus with locations between Gloucester and Cheltenham being more attractive in terms of infrastructure provision. Opportunities to the North of Gloucester could be linked with opportunities to the west of Cheltenham in terms of joint funding of transport infrastructure between the two settlements and central service or infrastructure hubs providing for both locations.

PROPOSED CONSULTATION DRAFT STRATEGIC DEVELOPMENT MANAGEMENT POLICIES

The following development management policies have been drafted for consultation and illustrate how the vision and development strategy could be delivered. These are the [policies that will provide the strategic framework for more detailed local planning policies contained within future local plans of each JCS authority. The policies reflect the current emerging strategy that is being consulted upon and will be reviewed to take account of any changes to the strategy arising from this consultation. At the next stage of consultation the strategic development management policies will include additional policies including the phasing, infrastructure provision, delivering a continuous supply of housing, housing mix, employment, masterplanning and design.

PROPOSED SETTLEMENT HIERARCHY

The following settlement hierarchy is proposed which will be used to deliver the development strategy.

Category	Settlement Tier	Settlements included	
Gloucester wider Policy area	First	Gloucester City Hucclecote Brockworth Innsworth Longford Churchdown	These settlements are the main focus for new homes, jobs, retail, leisure, education and cultural development. They make best use of existing principal infrastructure networks. They represent the most sustainable locations for development.
Cheltenham wider Policy Area	First	Uckington Noverton Park Southam	
Tewkesbury Town Wider Area	Second	Tewkesbury Town Ashchurch Northway Wheatpieces	These settlements have their own high level of services, facilities and local employment. The existing motorway junction and railway station at Ashchurch provides good communication links.
Larger Settlements	Third	Bishop's Cleeve Ashleworth	These settlements provide important local facilities reducing the need to travel to the principal locations of Cheltenham or Gloucester, this is particularly important for

Category	Settlement Tier	Settlements included	
		Winchcombe Alderton Highnam Toddington Shurdington Maisemore Twynning Gotherington Dumbleton Southam	access to shops, schools or health care which are needed on a regular basis
Medium Settlements	Fourth	Apperley Aston Cross Aston-on-Carrant Badgeworth Boddington Brockhampton Chargrove Down Hatherley Elmstone Hardwicke Forthampton Greet Gretton	These settlements contain services and facilities but on a reduced level when compared with the larger settlements. They primarily serve the needs of local residents and visitors but may serve a wider rural area to a more limited extent

Category	Settlement Tier	Settlements included	
		<p>Little Witcombe</p> <p>Minsterworth,</p> <p>Norton</p> <p>Oxenton</p> <p>Pamington</p> <p>Sandhurst</p> <p>Snowhill</p> <p>Southam</p> <p>Stanway</p> <p>Staverton</p> <p>Stoke Orchard</p> <p>Teddington</p> <p>Tirley</p> <p>Tredington</p> <p>Twigworth</p>	
Small Settlements	Fifth	<p>Alstone</p> <p>Barrow</p> <p>Bentham</p> <p>Buckland</p> <p>Chaceley</p> <p>Charlton Abbots</p> <p>Deerhurst</p> <p>Deerhurst Walton</p>	<p>These settlements will have few, if any, facilities and services. They may be poorly served by public transport and some distance from local employment opportunities. These settlements are less likely to serve the needs of residents and visitors to the surrounding rural area</p>

Category	Settlement Tier	Settlements included	
		Didbrook Fiddington Great Washbourne Great Witcombe Hardwicke Hasfield Hawling Laverton Little Washbourne Prescott Priors Norton Shuthonger Stanton The Leigh Walton Cardiff Wood Stanway Wormington	

Table 10: Settlement Hierarchy

PROPOSED POLICY JCS A: JCS Development Strategy

The following strategy provides a long term planning framework for the JCS area.

Major employment, retail and leisure development will be directed to the central areas of Gloucester and Cheltenham to make the best use of land, existing infrastructure and to deliver regeneration.

Additional development will be located on the periphery of Cheltenham and Gloucester at the most sustainable locations.

New homes and employment will be directed to Tewkesbury town to strengthen its role as a major market town and provider of local services and support regeneration initiatives. Rural areas will provide new homes and limited rural employment in accordance with the settlement hierarchy.

All development will be required to adequately provide infrastructure according to the requirements of the Joint Core Strategy Infrastructure Plan.

GLOUCESTER WIDER POLICY AREA:

The Gloucester wider policy area will accommodate a minimum of 13,750 new homes as part of phase 1 of the development strategy. These locations are where the existing city centre is most accessible, contribute to the urban regeneration programme, make best use of existing infrastructure while minimizing the impacts on the landscape and avoid major areas of flooding.

The city will identify land to accommodate over the plan period;

- 6,500 new homes within Gloucester
- 3,100 new homes to the north of Gloucester at Innsworth (Tewkesbury borough)
- 1,500 new homes to the east of Gloucester at Brockworth (Tewkesbury borough)
- 750 new homes to the north of Gloucester at Churchdown (Tewkesbury borough)

CHELTENHAM WIDER POLICY AREA:

The Cheltenham wider policy area will accommodate a minimum of 10,050 new homes as part of phase 1 of the development strategy. The preferred directions for development on the edge of Cheltenham are at those locations which best contribute to the urban regeneration programme.

The borough will identify land to accommodate over the plan to period;

- 3,700 new homes within Cheltenham
- 4,450 new homes to the north west of Cheltenham (Cheltenham and Tewkesbury boroughs)
- 1,300 new homes to the south of Cheltenham (Cheltenham borough)

TEWKESBURY BOROUGH POLICY AREA:

Tewkesbury town and the rural area will accommodate 5,600 new homes. Major new employment and housing will also be delivered at Tewkesbury town/Northway/Ashchurch. Whilst development will be

focused upon central areas of the town as part of the masterplan and following the sequential process, peripheral development will also be required that does not provide flood risk or exacerbate existing areas of flooding. DSDC Ashchurch and adjoining land to the north may provide an opportunity for a mixed use re-development including 2,100 new homes should it close.

The borough will identify land to accommodate over the plan to period;

- 500 new homes within Tewkesbury town
- 2,100 new homes to the east of Tewkesbury town at Ashchurch (Tewkesbury borough)
- Beyond Gloucester, Cheltenham and Tewkesbury town, developments of a smaller scale (120 homes per year) will be distributed to the rural settlements in accordance with the settlement hierarchy.

PROPOSED POLICY JCS B: Meeting affordable housing needs

Proposed policy options

The JCS authorities believe that all new residential development shall contribute to the provision of affordable housing. Views are sought through the following options:

Option A

- On sites of less than 5 dwellings a financial contribution will be negotiated towards affordable housing provision.
- For sites of 5 dwellings or more, no less than 40% of the dwellings should be affordable.

Or

Option B

- On sites of less than 5 dwellings a financial contribution will be negotiated towards local affordable housing provision.
- For sites of 5 or 6 dwellings a contribution of 2 affordable units will be required
- For sites of 7 or 8 dwellings a contribution of 3 affordable units will be required
- For sites of 9 or 10 dwellings a contribution of 4 affordable units will be required
- For sites of 10 or more, no less than 40% will be affordable

Or

Option C

- As A or B but include a requirement that in the Tewkesbury rural area, i.e. one outside of the Gloucester, Cheltenham or Tewkesbury wider area, no less than 50% of dwellings should be affordable.

The size, property type, tenure, quality standard and distribution of affordable homes to be provided as part of development proposals could be subject to negotiation dependent upon the housing need, site characteristics and development viability. On sites where the affordable housing provision set out above is proven to the satisfaction of the local planning authority not to be viable, the maximum proportion or contribution to affordable housing will be sought that does not undermine the development's viability. Financial viability assessments evidence will be required that conform to an agreed methodology and where necessary independently appraised by the local authority at the cost of the applicant. Contingent Deferred Obligations and other flexible arrangements will be sought through planning agreements on a case by case basis, to allow for changing market conditions in future.

The local authorities preferred solution is on-site provision for developments of 5 dwellings or more. Where it can be demonstrated to the satisfaction and agreement of the local planning authority, off site contributions either as dwellings on a suitable alternative site or financial contribution would be acceptable.

The manner in which this policy will be implemented will be set out in affordable housing supplementary planning documents prepared by the JCS authorities. Early pre-application discussions will be expected in all affordable housing negotiations.

Which option do you consider would be most effective in achieving affordable housing in the JCS area?

Evidence set out in the three Housing Needs Assessments (2010) for Gloucester, Cheltenham and Tewkesbury indicate that there is a significant annual requirement for new affordable homes. This is supported by the Gloucestershire Affordability Model which sets out that against the scenarios in this document there is a high level of annual need for affordable homes across the JCS area

In current local Plan policies a significant number of smaller sites across the JCS area have delivered just under the threshold and have therefore not been required to contribute towards meeting the identified affordable housing need. However, the identified shortfall in affordable housing provision across the JCS area could be reduced if all sites were to make an affordable housing contribution where is viable to do so.

It is fully intended to subject the above proposed policy to viability testing as part of the preferred JCS document in 2012 alongside the implications of infrastructure funding and the viability of the proposals in the JCS as a whole.

Consultations on Issues and Key Questions

The issues and key questions consultation responses identified the need to continue to provide affordable housing within the JCS area for both rural and urban areas. The need to provide affordable dwellings in small settlements and villages was clearly identified as well as the need to continue to provide affordable units in new developments adjacent to the major settlements.

Respondents suggested thresholds between two and 15 (to include both new build and conversions), and targets between 35% (in line with the RSS) and 50%. Several respondents suggested setting site-specific figures, or varying figures according to settlement type and size in line with guidance from the Campaign to Protect Rural England (CPRE).

Several respondents highlighted that the JCS will outlast the economic downturn and called for high and defensible targets/thresholds in spite of developers' likely viability objections.

PROPOSED POLICY JCS C: Rural exception sites

Proposed policy direction

Provision for new housing will be encouraged in rural settlements in accordance with the settlement hierarchy. However those settlements identified as being suitable for further development, where it can be demonstrated that there are exceptional circumstances for affordable housing to meet a local need, consideration will be given to allowing developments on the basis of the following criteria:

1. new development will provide homes that meet a clearly identified local affordable housing need either: through a local housing needs assessment that relates specifically to the immediate settlement and adjacent rural parishes; or through other such robust and defensible assessment of housing needs specific to the settlement area
2. the need cannot be reasonably met within the development limits of the settlement concerned, where it would be permitted under normal policies
3. the site has reasonable access to local services and facilities; and/or public transport; or where it can be demonstrated that the provision of housing for local people will assist the sustainability of the settlement area
4. the development is in scale and in keeping with the form and character of the settlement and local landscape setting
5. it can be agreed that the development will be subject to a planning obligation to ensure that all initial and subsequent occupiers of the affordable dwellings will be to meet the continuing needs of local people

The JCS authorities understand that in some instances it will not be possible to deliver 100% affordable housing on an exception site. In this instance we recommend that as an exceptional circumstance consideration will be given to a percentage of open market housing to cross subsidise affordable housing provision. In such circumstances early discussion with the local planning authority will be required where it can be demonstrated that:

1. there is clear recognition from the local community of the need to provide affordable housing;
2. there is no public subsidy or there is insufficient other subsidy available to support affordable housing development without cross subsidy from market homes on the development scheme;
3. the development would provide the maximum viable level of affordable housing.

For such development proposals, the applicant will be required to provide supporting evidence in the

form of an open book development appraisal that may be independently assessed by the Council at the cost to the applicant.

Further details on the implementation of this policy will be set out in Supplementary Planning Documents.

Reasoned justification

It is particularly difficult to secure an adequate supply of affordable homes for local people in rural areas, particularly with subsidies now significantly reduced and while the principal urban areas are the foci of new homes there is a need to ensure local rural housing need is met. Fewer rural affordable homes are likely to be delivered to meet specific and identified local housing need.

The localism bill seeks to give local communities more power in deciding how their local areas can grow and develop. While community based plans need to be in general conformity with an adopted local development plan, the rural exception sites criteria based policy will provide an opportunity for local communities to develop sites for affordable homes, where open market dwellings might not normally be permitted.

Consultations on issues and key questions

The issues and key questions consultation responses identified the need to continue to provide affordable housing within the JCS area for both rural and urban areas. The need to provide affordable dwellings in small settlements and villages was clearly identified as well as the need to continue to provide affordable units in new developments adjacent to the major settlements.

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PROPOSED POLICY JCS D: Green belt

Proposed policy direction

A green belt is to be maintained in the JCS area although it is still to be subject to a fundamental review in order to define its extent and to establish reasonable long term boundaries taking into account development needs on the edges of Gloucester and Cheltenham.

The boundaries of the reviewed green belt will be defined on the JCS proposals map. The boundary identified will take into account longer term need by identifying safeguarded land which may be required beyond this plan period to ensure that the green belt does not need an early review at the end of this plan period.

Only those uses considered to be appropriate within a green belt, as defined by national planning policy guidance, will be considered suitable for development within the redefined JCS green belt, there will therefore be a presumption against any new development which is inappropriate within the redefined green belt.

This policy direction is preferred as in order to be able to accommodate the housing and employment growth likely to be required for the JCS area. The boundary of the green belt needs to be reviewed to enable development at the most sustainable locations over the next 20 years and beyond. In undertaking such a fundamental review consideration can also be given to development needs beyond 2031.

Consultation on issues and key questions

The issues and key questions consultation responses indicated that there was particularly strong resistance to further new development in the existing green belt, however some responses called on the authorities to build on the existing employment opportunities in and around Gloucestershire airport and to allow more employment development in this location.

PROPOSED POLICY JCS E: Flood risk and water management

Proposed policy direction

Flooding and effective water management is a serious issue across the JCS area given it is a location that has experienced significant flooding incidents, the most recent being in 2007. Flooding and water management is therefore a critical consideration in balancing the need to deliver the vision of a more prosperous local economy and attractive location to live against the environmental constraints of the area.

The Joint Core Strategy authorities in preparing the JCS and local plans should:

- apply the Sequential Test and sequential approach to directing site allocations and broad locations for development to locations with the lowest probability of flooding
- where the Sequential Test alone cannot deliver acceptable sites, the Exceptions Test should be applied
- on green field sites within flood zone 3 less vulnerable and water compatible uses may be acceptable, all other uses should be avoided. Opportunities to reinstate floodplain or flood storage throughout flood zone 3 will be sought wherever possible
- urban previously developed sites within areas of existing flood zone 2 and 3 should be considered through the Sequential Test and (if appropriate) the Exception Test where there is a clear need to meet regeneration requirements in a sustainable manner
- all development should adhere to the advice contained within the most current version of the Joint Core Strategy strategic flood risk assessment (Level 1 and 2) and guidance provided on flood risk contained within Planning Policy Statement: 25
- where sufficient evidence that the development of a site of less than 1 hectare in Flood Zone 1 may cause increased flood risk, then a detailed flood risk assessment should be undertaken by the developer
- all new development will be required to deal with surface water in accordance with the principles of SUDS (Sustainable Drainage). This should take account of quality, quantity and amenity, any design should follow the management train principle
- all new development should investigate the opportunities to improve runoff rates from a site to reduce flood risk. In areas of identified surface water flood risk and/or where the receiving watercourse has insufficient channel capacity, a greater reduction in surface water runoff would be required
- on greenfield sites, developments should attenuate runoff so as to not exceed the corresponding greenfield rates generated by a range of storm events with the probability of occurring up to and including once in 100 years. An allowance should be made for the additional flow generated by climate change
- on previously sites, sustainable drainage schemes should reduce the proven current instantaneous runoff rate by a minimum of 5%

Consultations on issues and key questions

The issues and key questions consultation responses indicated that there was consensus on the importance of this issue for the JCS area but there was disagreement over the adequacy of current policies to address it. Many respondents considered that JCS policies should go beyond national planning policy with regard to flooding while the development industry viewed the current policy and technical assessment framework found in Planning Policy Statement: 25 as adequate.

PROPOSED POLICY JCS F: Town centre development

Proposed policy direction

This policy sets out the key core principles that will be applied to town centre uses in the JCS area. Further, more detailed policies will be set out within other development plan documents to be prepared by the individual JCS authorities. To ensure the successful delivery and maintain investor confidence in key town centre regeneration schemes, both the sequential test and impact test will be strictly applied by the relevant planning authority, in accordance with Planning Policy Statement: 4. The same tests will be applied in smaller designated centres in order to maintain their vitality and viability to provide for the everyday needs of the local communities.

The JCS should apply the following core principles to development in town centres:

- protect the vitality and viability of designated town centres
- support new retail and other town centre use development in designated centres commensurate with their role and function (as defined by the settlement hierarchy), including provision of a good range of shopping, food and drink uses, services, offices, entertainment, cultural and leisure facilities, and high quality public spaces
- apply the sequential approach to site selection, whereby sites located within designated town centres must be robustly assessed for their ability to accommodate the development before other, less central sites are considered
- all applications for new retail or other town centre uses must demonstrate an acceptable impact on the vitality and viability of a designated centre and must demonstrate that they do not undermine the regeneration objectives for the area

Safeguarding the main town centres of Gloucester and Cheltenham will be key to ensuring that the JCS area is a thriving and attractive place to live and work over the lifetime of the plan. This policy is required in order to safeguard the town centres from inappropriate edge and out of centre development by uses which should more reasonably be located in the central area. The policy direction

also acknowledges the need for new development in the broad locations to provide a measure of retail development at a level appropriate to meet local requirements.

Reasoned justification

The JCS area has a rich and diverse town centre offer, which attracts shoppers, tourists and other visitors from across Gloucestershire and the wider area. The two main centres are Gloucester and Cheltenham, whilst smaller centres, such as Tewkesbury and Winchcombe, providing more for the day-to-day needs of a large rural hinterland. There are also a large number of smaller district and local centres, in both urban and rural locations, which provide for localised day-to-day shopping and service needs.

Whilst centres are performing well there are some areas where there has been a noticeable decline in health, for example in terms of the number of unit vacancies, including retail but also offices, pubs and restaurants. Whilst the recession has played a part in this, protecting the existing designated centres is the key to ensuring their continued vitality and viability.

In the JCS area a number of key regeneration sites are currently being progressed, by the Gloucester Heritage Urban Regeneration Company (GHURC), Cheltenham Development Task Force (CDTF) and through the Tewkesbury town masterplan. These schemes are critical to maintaining and enhancing the performance of these centres, and in the case of Gloucester and Cheltenham, their ability to compete against other centres in the sub-region.

Consultations on issues and key questions

The issues and key questions consultation responses indicated a strong desire from respondents for the regeneration that has been commenced in all three centres to continue to be pursued, acknowledging the complementary roles of Gloucester and Cheltenham. The need to improve the town centres was highlighted along with a need to provide balanced evening and night time economy activities.

PROPOSED POLICY JCS G: Gypsy and traveller accommodation

Proposed policy direction

National planning guidance sets out that local authorities should assess the needs of gypsy, traveller and travelling showpeople communities, and provide through development plans, where possible, specific deliverable site allocations to provide for that identified need. The 2007 GTAA has provided the basis for the above preferred policy direction however the reviewed 2012 GTAA will provide updated evidence on which the preferred option policy will be based.

New gypsy, traveller and travelling showpeople sites should be provided at the strategic allocations and broad locations. Outside identified sites where there is an identified need, proposals will be assessed against a criteria based policy.

Consultations on issues and key questions

The issues and key questions consultation responses indicated that existing underused brownfield sites, including any underused land owned by public bodies, should be considered for use by travelling communities before allocating green field sites. Responses also suggested that sites should be in close proximity to schools, doctors and services and that a number of smaller sites should be provided (10 pitches or less) rather than fewer sites providing a larger number of pitches.

JCS EVIDENCE BASE

Document	Available at
Broad Locations Report	
CBC SHLAA (Oct 2010)	http://www.cheltenham.gov.uk/downloads/file/2046/strategic_housing_land_availability_assessment_2010
GCC SHLAA (July 2010)	http://www.gloucester.gov.uk/Documents/councilservices/Planning/LDF/SHLAA/GloucesterSHLAAJuly2010.pdf
Gloucestershire Housing Trend Analysis and Population and Household Projections (May 2011)	http://www.gct-jcs.org/Documents/EvidenceBase/GloucestershireHousingTrendAnalysisPopulationandHouseholdProjections(May2011).pdf
Gloucestershire Renewable Energy Study	http://www.gloucestershire.gov.uk/index.cfm?articleid=102901
Gloucestershire Strategic Housing Market Assessment (SHMA)	http://www.gloucestershire.gov.uk/index.cfm?articleid=15389
Gloucestershire Strategic Infrastructure Delivery Plan (SIDP)	http://www.gloucestershire.gov.uk/index.cfm?articleid=101114
Green belt Review (Sept 2011)	http://www.gct-jcs.org/EvidenceBase/GreenBeltReview.aspx
Gypsy and Traveller SHLAA	
Hotel Capacity Study	http://www.gct-jcs.org/EvidenceBase/HotelCapacityStudy.aspx
NLP Employment Land Review (March 2011)	http://www.gct-jcs.org/EvidenceBase/EmploymentStrategy.aspx
Settlement Audit	
Strategic Flood Risk Assessment Level 1 (SFRA1)	http://www.gloucestershire.gov.uk/index.cfm?Articleid=17247
Strategic Flood Risk Assessment Level 2 (SFRA2)	

SEA/SA	
TBC SHLAA (Sept 2011)	http://www.tewkesbury.gov.uk/shlaa
Entec Urban Extension Definition Study (July 2010)	http://www.gct-jcs.org/EvidenceBase/UrbanExtensionDefinitionStudy.aspx
Infrastructure SDIP	

