

Cheltenham Borough Council
Council – 10 November 2011
Joint Core Strategy: developing the preferred option
Report of the Leader

Accountable member	Councillor Steve Jordan
Accountable officer	Jane Griffiths, Director of Commissioning
Accountable scrutiny committee	Environment
Ward(s) affected	All
Executive summary	<p>Following proposals set out in the Decentralisation and Localism Bill (2010); Cheltenham Borough Council is now the decision maker in determining long term development needs for the Borough. The importance of this change is significant and Cheltenham now needs to identify the provision for meeting the Borough's development needs. The Joint Core Strategy (JCS) is the strategic development plan being prepared to help determine these long term needs over a plan period to 2031.</p> <p>The JCS recognises that coherent spatial planning requires local authorities to look beyond its immediate administrative boundaries; the JCS therefore provides a framework for development in Cheltenham, Gloucester and Tewkesbury for the next 20 years to 2031. Looking beyond the immediate built up boundary for Cheltenham results in the need for debate around meeting long term needs and the potential resultant incursion into the green belt and the wider countryside. This is a contentious issue for the Borough.</p> <p>To ease consideration the 20 year period has been broken down, firstly looking at the first 10 years up to 2021 and secondly the last 10 years of the plan 2021 – 2031.</p> <p>This report summarises the Developing the Preferred Options document and seeks Council approval to publish the document for public consultation. The purpose of the Council meeting is to enable the JCS to progress to the arena of wider public debate and draw out areas of concern arising from members in respect of the emerging document.</p> <p>Based on Cheltenham Community Strategy, the council's corporate strategy sets out the council's vision for the area and the JCS is a way in which these strategic objectives might be met; particularly to address the issue of affordable housing.</p> <p>Publication of the JCS for public consultation will enable residents in the JCS area and wider stakeholders to engage in a meaningful dialogue and debate about the future of the area, particularly what they will want the urban and rural areas to be like in 20 years time, and how we might be able to accommodate housing need whilst at the same time protecting the things we value and hold dear about the area.</p>

Recommendations	<ol style="list-style-type: none">1. Council approve publication of the draft “Developing the Preferred Options Consultation Document”, set out in appendix 1, for the purposes of consultation;2. Council notes that the officer recommendation is that of the 4 illustrative scenarios presented Scenario B would best meet the assumed development needs of the Joint Core Strategy area for the first 10 years of the plan period to 2021;3. Council notes that Scenario A is the only one that would protect the current green belt;4. Council confirms its intention to protect green belt and open countryside around Cheltenham;5. During the consultation stage (December 2011 – February 2012) further assessment of scenarios is undertaken for Cheltenham and reported back to Council alongside responses received to the 4 scenarios set out in the consultation document by the communities of Cheltenham and wider stakeholders;6. Council requests that the further work includes testing more radical approaches to defining affordability which help meet local housing need;7. Appendix 2: Response Report on Consultation Carried out to date (October 2011) is published as part of the consultation exercise;8. Appendix 3 The Sustainability Appraisal is published as part of the consultation exercise;9. Authority be delegated to the Director of commissioning in consultation with the Leader to make any necessary minor revisions to the draft document prior to publication taking account of any issues arising from the consideration of the document by Tewkesbury Borough Council and Gloucester City Council.
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Financial implications	<p>Cheltenham Borough Council has committed £60,000 along with Gloucester City Council and Tewkesbury Borough Council for 2011/12 to support delivery of the JCS. The JCS reserve has a balance of £234,580 carried over from 2010/11 to support the current and future funding of the joint working arrangements, including completion of the evidence base and future contribution to meeting costs of an independent examination. However further funding is required from 2012/13 to meet Cheltenham's costs in relation to reviewing the wider local plan as the Local Plan reserve will have been fully utilised in 2011/12. Future consideration will be required to approve a new budget for this.</p> <p>Contact officer: Andrew Sherbourne – Principal Accounting Technician</p> <p>andrew.sherbourne@cheltenham.gov.uk, 01242 264337</p>
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<p>Legal implications</p>	<p>The JCS is produced for consultation as the key document in the Council's Local Development Documents produced jointly with the Councils of Gloucester City and Tewkesbury Borough.</p> <p>Developing the Preferred Options document on approval by Members for public consultation should be given some weight for development control purposes. Members will be given advice on how much weight it is appropriate to give at the time an application is determined. The weight to attach to the document will depend on the stage it has reached and will increase as successive stages are completed. The nearer the JCS proceeds to formal adoption the greater the weight it will have.</p> <p>The Decentralisation and Localism Bill is expected to receive Royal Assent at the end of 2011. This includes the Government's intention to abolish Regional Spatial Strategies. The JCS is being progressed on the basis that it is anticipated that the South West Regional Spatial Strategy will no longer be part of the development plan when the JCS is submitted for examination.</p> <p>The statutory requirements for public consultation in the development plan process are set out in the Council's Statement of Community Involvement published under section 18 of the Planning and Compensation Act 2004 ("the Act").</p> <p>The statutory process for adoption of local development documents is set out in the Act and requires the Council to produce the relevant documents in accordance with the Act and Regulations and to engage in public consultation on those documents. Once the Councils are satisfied that the development documents are ready they must, under section 20 (1) of the Act submit them to an independent expert for examination. The expert will be an Inspector and the purpose of an independent examination of the joint core strategy is to determine:</p> <p>(a) whether it satisfies the requirements of sections 19 and 24(1) of the Act and Regulations as specified and</p> <p>(b) whether it is sound</p> <p>To be sound a core strategy should be justified, effective and consistent with National Policy.</p> <p><i>"Justified" means that the document must be:</i></p> <ul style="list-style-type: none"> • founded on a robust and credible evidence base • the most appropriate strategy when considered against the reasonable alternatives <p><i>"Effective" means the document must be:</i></p> <ul style="list-style-type: none"> • deliverable • flexible • able to be monitored <p><i>"Consistent with National Policy":</i></p>
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National Policy includes the emerging National Planning Policy Framework (NPPF) which was produced in draft for consultation in July 2011. Members have made a number of comments and objections to this. The draft NPPF is a consultation document. There have been extensive and well publicised consultation responses suggesting the Government will be subject to considerable pressure for significant changes before final publication. The weight to be attached to its draft policies will be for the decision maker. It advocates a simpler framework for the planning system and a presumption in favour of sustainable development at its heart.

The draft NPPF states that for the purposes of the planning system, delivering sustainable development involves three particular roles: an economic role, a social role and an environmental role. It includes a set of draft 'Core Planning Principles' that underpin the planning system, the first of which is a reaffirmation that planning should be genuinely plan-led. The core principles also include the need to take into account the environmental quality of land and to seek to protect environmental assets. The duty upon planning authorities to cooperate on planning issues that cross administrative boundaries is also emphasised. The adoption of a JCS for Tewkesbury, Gloucester and Cheltenham is obviously in furtherance of a plan-led approach to planning in the area.

In terms of the weight to be given to the draft NPPF the advice to planning Inspectors says that the draft NPPF is likely to be referred to by the parties in the current appeal and development plan case work. It is capable of bring a material consideration, although the weight to be given to it will be a matter for the decision maker in each particular case.

Emerging NPPF requires strategic planning across local boundaries and expects joint working between authorities on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities – duty to co-operate on planning issues that cross administrative boundaries. The guidance goes on to refer to Local Planning Authorities working collaboratively on strategic planning priorities to enable delivery of sustainable economic growth in consultation with Local Enterprise Partnerships.

The preparation and content of the JCS Preferred Options Consultation Document is consistent with the requirements of the emerging National Policy Framework and demonstrates co-operation between the authorities.

The focus of the Examination is on soundness of the plan as a whole and is not restricted to those matters that have been objected to. The Council is required to accept the recommendations of the Examiner and the only choice open to a local planning authority that does not want to accept the Examiner's recommendations is to not adopt the plan. This procedure may be changed as there are proposals relating to this in the Localism Bill.

The only possible legal challenge to the plan once it has been adopted is to the High Court within 6 weeks of adoption by a "person aggrieved". Challenge must be on the grounds set out in the Act which are broadly that the document is not within the appropriate power or a procedural requirement has not been complied with. The grounds are thus fairly narrow and the time scale for challenge short so that there is certainty as to the validity of the documents. The Secretary of State has powers of intervention and direction in relation to the plan making process.

It is relevant for Members to be aware that the Localism Bill proposes a new duty on local authorities to co-operate with each other. This duty will be relevant, if the Bill is given royal assent, as it requires local authorities to engage constructively, actively and on an ongoing basis with other local authorities in developing their JCS documents.

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HR implications (including learning and organisational development)	<p>The progression of the JCS is a major logistical task. Considerable human resource is required for the collation and assessment of evidence, formulation of policy and extensive consultation with the public and stakeholders. At present, this resource is being provided by the planning teams within the 3 Councils of Gloucester, Cheltenham and Tewkesbury and through the JCS budget. Overall resource requirements will require close monitoring going forward.</p> <p>Contact officer: Julie McCarthy HR Operations Manager julie.mccarthy@cheltenham.gov.uk , 01242 264355</p>
Key risks	<p>CR 33 - If the council does not keep the momentum going with regards to the JCS then the policy vacuum left by the abolition of the RSS and the resultant delay in projections and framework could result in inappropriate development.</p>
Corporate and community plan Implications	<p>The JCS sets out a vision for the area based upon previous consultation with a range of stakeholders. The vision reflects the issues which are within the council's own corporate strategy and within the Cheltenham community strategy.</p>
Environmental and climate change implications	<p>The JCS must go 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 will be published alongside consultation document, and is attached at Appendix 3.</p>

2.0 INTRODUCTION / BACKGROUND

- 2.1** All local authorities are under a statutory obligation 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.
- 2.2** In 2008 Gloucester, Cheltenham and Tewkesbury Councils agreed to prepare a single core strategy covering the entirety of the administrative areas of each of the Councils, which would consider and plan for the future development needs of the area up to 2031. Many of the characteristics and the issues which the area faces, such as flooding, outstanding landscape and the need to plan for sufficient development to provide jobs and 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 (JCS) is based on collaborative research into the three authority areas' characteristics, relationships (with each other and adjoining areas), past trends and future predictions. This information forms part of the evidence base for the plan and can be seen on the JCS website ([www.gct-Joint Core Strategy.org](http://www.gct-Joint-Core-Strategy.org)).
- 2.3** The Government is proposing to abolish the Regional Spatial Strategies (via the Localism Bill) and give local authorities the opportunity and responsibility to identify strategic development requirements for the next 20 years. As such it is essential that Cheltenham puts in place a long term strategic plan that will guide future development of the Borough based upon a robust evidence base. Working collaboratively with Gloucester City and Tewkesbury Borough means that Cheltenham Borough Council can seek to address its corporate priorities and wider Community Plan objectives and aspirations within a wider context addressing key issues such as affordable housing, infrastructure delivery, connectivity to wider green spaces and countryside etc.
- 2.4** The changes brought forward by the Localism Bill brings decision making to the local level,

this is supported. However the significance of the decision of identifying long term development needs cannot be underestimated. In Cheltenham the contention exists between meeting the long term needs of the Borough and the impacts of incursion into the green belt and the wider countryside.

2.5 Gloucester, Cheltenham and Tewkesbury are each required to consider the 'Developing the Preferred Option' report and approve for the purposes of public consultation. Tewkesbury Borough was the first of the 3 Councils to consider the document on 26th October and resolved the following:

1. That Council approves the publication of the draft "Developing the Preferred Options Consultation Document", set out in Appendix 1, for consultation.
 2. That, based on the evidence which has currently been considered, and of the 4 scenarios in the document to be published for consultation, the Council consults with the public on the basis that Scenario B appears to best meet the development needs of the Joint Core Strategy area for the first 10 years of the Plan period to 2021.
 3. That Appendix 2: Response Report on Consultation Carried Out To Date (October 2011) is published as part of the consultation exercise.
 4. That Appendix 3: The Sustainability Appraisal Is published as part of the consultation exercise.
 5. That authority be delegated to the Corporate Head of Borough Development, in consultation with the Tewkesbury Members of the Joint Core Strategy Member Steering Group, to make any necessary minor revisions to the draft document prior to publication taking account of any issues arising from the consideration of the document by Cheltenham Borough Council and Gloucester City Council. Any major changes to be brought to Council on 29 November.
 6. That during the consultation stage, December 2011 to February 2012:
 - 1) further assessment of scenarios and locations using the published Tewkesbury, Gloucester & Cheltenham SHLAAs is undertaken
 - 2) further Strategic Flood Risk Assessment Level 2 will be carried out, the scope of that work being defined by the Executive Committee and will be reported to the Council alongside the consultation responses received.
- That the Executive Committee will, when considering the scope of the further Strategic Flood Risk Assessment Level 2 work, consider and determine the timing of the production of supplementary guidance on flooding.

Gloucester City will be considering the emerging JCS at a meeting of Policy Sub Committee on 10th November and subsequently at Council on 24th November 2011.

2.6 What is the Developing the Preferred Option document?

The Developing the Preferred Options consultation document, attached as appendix 1, builds on previous consultations and sets out how the area could evolve, identifying potential strategic allocations and broad locations for delivering housing and employment and other strategic requirements. A report on the previous consultation to date is attached as appendix 2.

2.7 Once considered, and if approved by each of the three Councils, the document will be published for public consultation from 13 December 2011 until 12 February 2012 (9 weeks). Alongside the JCS, the wider evidence base is also available for public scrutiny. Comments arising in response to the emerging JCS will then be used to inform the

Preferred Option Document to be published for further consultation in summer 2012, before the final version of the JCS is submitted to the Secretary of State for independent examination in autumn 2013. It is important to note that the JCS presented to Council is very much a draft document – to be tested via public debate and scrutiny.

3.0 SUMMARY OF THE JOINT CORE STRATEGY – DEVELOPING THE PREFERRED OPTIONS CONSULTATION DOCUMENT

3.1 The document falls into 3 main sections:-

1. description, vision and strategic objectives
2. development strategy and scenarios for development
3. development management policies

3.2 *Description, vision and strategic objectives*

In this section there is a brief description of the plan area with particular focus on the key current population characteristics and the local economy and employment.

3.3 The vision for the JCS is to produce a strategy which fosters growth in the local economy and provides sufficient homes in sustainable locations, without increasing the risk of flooding or harming high quality landscape, whilst maintaining the separate vitality, identity and character of individual settlements. As part of the vision, the document outlines what this approach might mean for each part of the JCS Area.

3.4 Ten strategic objectives have been identified, which the strategy will seek to achieve:-

- 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 community
- Improve skills and educational attainment
- Increase access to jobs/services via sustainable transport modes

These strategic objectives were arrived at through consultation with Local Strategic Partnerships, public and wider stakeholder consultation and engagement. The challenge for Cheltenham is delivering a balance between what's important for the communities of the Borough, maintaining quality of life and conservation of the natural and built environment whilst delivering development which meets local needs. These challenges will be tested via a series of key questions developed to provide a framework to the consultation. These questions will be agreed with the JCS Member Steering Group in advance of the consultation.

3.5 *Development Strategy and development scenarios - What scale of development is required?*

The Government has set out that with the proposed revocation of regional housing and employment targets it will be the responsibility of local planning authorities to establish their own housing and employment requirements based upon local evidence of the need for new homes and jobs. This is a major change and a significant decision for Cheltenham Borough Council; as such it is essential that the Council takes a long term view, taking account of all relevant evidence.

3.6 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 (May 2011). This provides the authorities with a good basis for understanding how population levels will change over the plan period, taking account of both indigenous and migrant demand for new housing. Clearly however projections will not be 100% accurate – they extrapolate past trends and apply these trends directly to the future; as such they cannot take into account the impact of potential changes in policy or variations in the trend due to external influences – such as the economy. These concerns are shared with Members and through debate some Members have questioned the validity and accuracy of projections. The Office for National Statistics have addressed the issue of accuracy and in an analysis of national population projections in 2007 considered that the margin of error in projections was around 2%. Notwithstanding this, Members concerns are valid and in moving forward the JCS it will be essential that monitoring at key stages is built into the strategy and the strategy adjusted accordingly if required.

3.7 To address the uncertainties around projections, part of the JCS evidence base is an innovative tool; the “Gloucestershire Affordability Model”. This model aims to forecast ‘how the future might look’ focussed on different aspects of the housing market such as affordability and need, identifying potential changes in trend over time. All 4 scenarios set out in the JCS have been tested via this model.

3.8 Demographic projections are just part of the suite of evidence to inform the debate on the level of development required, capacity has been assessed via Council monitoring of residential land and analysis via Strategic Housing Land Availability Assessments.

3.9 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 JCS area and wider Gloucestershire. For this the authorities are using the most up to date information on local and national economic job projections as set out below.

3.10 *How many homes need to be provided for?*

The most recent local projections provided by Gloucestershire County Council have forecast that the JCS area will have a population of 367,800 people by 2031. This is a rise of over 45,200 compared to an estimated 322,600 people living in the area in 2011. Using this information it estimated that the number of new homes required in the JCS area is 36,800 (assuming that **all** of the demographic projection will be met), which means that 1,840 new homes would need to be provided every year until 2031.

3.11 In identifying how many new homes need to be provided some very difficult balances need to be made, such as delivering a step change in affordable housing, creating the right environment for a prosperous economy and creating places and spaces which have a positive impact on the quality of the environment, quality of life and well being of residents, workers and visitors to the Borough. It is clear from the previous consultation to date, that many people have concerns about housing growth and the potential implications for development of greenfield sites both within the existing urban area of Cheltenham and at its boundaries, together with the affect upon existing communities. These are all important considerations and concerns; therefore, in developing the JCS, 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. It is estimated that this would provide approximately 16,200 homes over the plan period to 2031.

3.12 Analysis undertaken by Gloucestershire County Council indicates that in Cheltenham, the driving force behind the demand for new housing comes from the indigenous population. In 2004 - 2009 75% of all new households were formed from within the indigenous population compared to 25% of new households attributable to net migration. This raises questions around defining local need and what level is achievable for Cheltenham. These issues will be drawn out within consultation questions included within the JCS when made available for public consultation

3.13 While the estimated number of new homes needed every year in the JCS area is 1,840 based upon demographic projections, the consultation document proposes that the communities, businesses and wider stakeholders of Cheltenham be given the opportunity 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.

3.14 4 scenarios are presented for consultation :-

- Scenario A 16,200 homes (810 per year: 220 of which would be required in Cheltenham) – based on accommodating urban capacity only together with windfalls in the last 10 years and 2,400 across the wider rural areas
- Scenario B 33,200 homes (1,660 per year: 520 of which would be required in the Cheltenham wider area) – based on accommodating 90% of the demographic projection (similar to annual housing delivery 2006 – 2011)
- Scenario C 36,850 homes (1,840 per year: 580 of which would be required in the Cheltenham wider area) – based on accommodating 100% of the demographic projection
- Scenario D 40,500 homes (2,025 per year: 640 of which would be required in the Cheltenham wider area) – based on accommodating an additional 10% on top of the 100% demographic projection (similar to annual housing delivery 2006 – 2008)

3.15 ***How many jobs should we provide for?***

Previous consultation has established the importance of creating jobs and improving the competitiveness of the area. This reflects the Gloucestershire Local Enterprise Partnership's (LEP) ambition to drive economic growth, improve productivity through increasing Gross Value Added (GVA) and encouraging business creation. It also reflects the vital role Cheltenham plays in supporting the economy of Gloucestershire and contributing to the vibrancy of the wider region.

3.16 To estimate the number of jobs to plan for, the latest economic job forecasts have been used to provide employment land requirements. There are about 177,000 jobs in the JCS area at present. There are a range of forecasts for the 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 required would be between 34 and 62 hectares. Further work is needed to refine these requirements but at this stage a mid point of 46 hectares is included in the strategy and included in the development scenarios B, C and D.

3.17 ***Proposed development hierarchy***

The proposed development strategy would focus development on the principal urban areas of Gloucester and Cheltenham, close to the main centres of population and employment to

make the best use of land, existing infrastructure and deliver regeneration. Where the urban capacity cannot accommodate all of the development required, the next most sustainable areas for development are considered to be those adjoining the urban areas. Beyond this, development would be located in and adjoining Tewkesbury Town, recognising its role as a major market town. In addition, smaller levels of development would be accommodated in and adjoining the rural settlements. Further work is required to develop the rural strategy further.

3.18 **Locations for accommodating development**

A number of potential strategic allocations have been identified which would provide the level of development required in the first 10 year of the plan to 2021. Further work is required to identify options for the second 10 years of the plan 2021 – 2031.

3.19 The potential strategic allocations include:-

Gloucester wider area - 13,750 new homes

This includes 6,500 homes within Gloucester, 1,900 within the Gloucester wider area falling within Tewkesbury Borough and potential strategic allocations within Tewkesbury Borough at Innsworth (3,100 homes), Brockworth (1,500 homes) and Churchdown (750 Homes).

Cheltenham wider area - 10,050 new homes

This includes 6,800 homes in Cheltenham – including commitments, sites identified via strategic housing land availability assessment and windfalls together with 1,800 homes within the potential strategic allocation at North West Cheltenham and 1,300 homes within the potential strategic allocation at South Cheltenham. A further 3,250 homes could be provided within Tewkesbury Borough including 2,650 homes within the strategic allocation site at North West Cheltenham, and commitments of 350 homes at Farm Lane and 250 homes at the former M & G sports ground.

Tewkesbury Town wider area – 3,230 new homes

This would include 1,130 homes already permitted and allocated in the Tewkesbury Borough Local Plan and a strategic allocation of 2,100 new homes at Ashchurch.

3.20 The potential strategic allocations have been subject to detailed assessment and informed by the wider evidence base of the JCS including;

- Strategic Flood Risk Assessment
- Green Belt Review
- Broad Locations
- Strategic Housing Land Availability Assessments
- Residential Land Availability Assessment
- Employment Land Review
- Sustainability Appraisal
- Habitats Regulation Assessment
- Gloucestershire Affordability Model

3.21 The capacities across the JCS together with potential strategic allocations indicate where development might be located in terms of the wider urban areas, and would involve Tewkesbury Borough accommodating 43% of the housing need for Gloucester City and 32% of the housing needs of Cheltenham Borough.

3.22 Even with the potential development identified above, there would still be a shortfall between the level of housing provided and the projected level of housing need to 2031 with each of the four scenarios, as follows:-

- A shortfall = 20,600 homes across JCS area (delivery of 4,333 new homes within the Cheltenham wider area – *shortfall of 7,204 if assessed against 100% demographic projection*)

- B shortfall = 3,700 homes across JCS area (delivery of 10,384 new homes in the Cheltenham wider area – shortfall of 301)
- C shortfall = 7,400 homes across JCS area (delivery of 11,537 new homes within the Cheltenham wider area - shortfall of 1,454)
- D shortfall = 11,000 homes across JCS area (delivery of 12,691 new homes within the Cheltenham wider area - shortfall of 2,668)

- 3.23** It is proposed to address the projected shortfall by considering three potential themes for the distribution of further development in the later stages of the plan period, i.e. beyond the first 10 years – after 2021. These would be based on either;
- maximising economic opportunities,
 - protecting the green belt or
 - making the best use of existing infrastructure.
- 3.24** The implications of each theme are set out in the consultation document in terms of what this might mean for further development in the second period of the plan from 2021 to 2031. There are no specific locations identified in this context but the consultation document does indicate potential areas which could be investigated further under each theme. Any such work would be carried out following the consultation as the next stage of the preparation of the Joint Core Strategy.
- 3.25** As part of the background evidence, the 3 Councils have carried out work looking at the rural areas and have defined a settlement hierarchy. This consists of:-
- The urban areas of Cheltenham and Gloucester and adjoining settlements
 - Tewkesbury town and adjoining settlements
 - Larger rural settlements, such as Bishops Cleeve, Highnam and Winchcombe
 - Medium sized villages, such as Brockhampton and Norton
 - Small villages such as Barrow and Prescott
- 3.26** This hierarchy is based on an audit of each settlement in terms of the services and amenities within the village and the distance to an urban area. An indicative figure of a total of 2,400 homes across the rural area for the length of the plan has been included in each of the scenarios. This would be equivalent to 120 homes a year. The public consultation will seek views on whether this level of development is reasonable, desirable and achievable. The consultation will also ask for local communities to advise the Council if they believe that there are sites within or adjoining the village where development could make a positive contribution to the health and future of the community.
- 3.27** ***Officer recommendation on scenarios***
As outlined above, the scenarios set out in the emerging JCS document have been informed by a wide evidence base including both traditional approaches such as demographic projections, assessment of the economy and landscape together with more innovative approaches including the Gloucestershire Affordability Model. The evidence base is extensive and key elements have been drawn together to reach conclusions on the 4 scenarios; all of which have been tested via Strategic Environmental Assessment/Sustainability Appraisal, provided at appendix 3.
- 3.28** Taking into account all evidence currently available; of the 4 scenarios set out in the JCS document it is the professional advice of officers that Scenario B would best meet the development needs of the Joint Core Strategy Area for the first 10 years of the plan period

to 2021. Scenario B takes account of the limit of urban capacity available within the built up area of Cheltenham whilst still delivering a 5 and 10 year supply of housing thereby contributing to affordable housing and contribution to economic performance. Clearly however, this scenario would require development outside the defined built up boundary of Cheltenham (61% of overall development) and result in incursion into the green belt and the wider countryside. It is appropriate that this is considered and debated with stakeholders and the communities of Cheltenham during the consultation on the JCS.

- 3.29** Scenario B provides 3,684 homes lower than the 100% demographic projections indicate. This reflects uncertainties around projections as set out in paragraph 3.6 of this report. This lower projection can be effectively monitored through the JCS plan period at key milestones and the strategy amended accordingly if population projections are not in alignment. Based upon the evidence currently available officers are of the view that Scenario B is defensible and offers a robust position for the Council.
- 3.30** Officers very much appreciate that if Scenario A was implemented then this would result in protection of the current green belt, a long standing ambition of the Council. However, the JCS needs to take a long term perspective; allocating the right level of development to meet requirements over a 20 year period and providing certainty both to those communities directly affected by the green belt designation and the development industry in identifying locations suitable and sustainable for the accommodation of the Borough's long term development needs. Scenario A would in theory deliver a 5 and 10 year supply of housing; but it would only do so because the total capacity has been capped at the level of urban capacity and windfalls within the last 10 years of the plan.
- 3.31** Notwithstanding concerns around the accuracy of population projections, Scenario A would only deliver 37% of the demographic, delivering around 220 new homes per year, significantly below the average house building level within Cheltenham Borough since mid 1991. It would provide 20,591 homes lower than the 100% demographic projection. A result of this will be the export of people (particularly those in the 25 – 59 age groups) out of Cheltenham as the number of households exceeds the level of housing available, exerting upward pressure on house prices and market rents and leading to lower levels of children and younger people within the population of Cheltenham. This would also occur in Scenarios B – D, but to a lesser extent.
- 3.32** Whilst affordable housing will be provided under Scenario A, it is anticipated that there will be considerable growth in the numbers of new households requiring affordable housing. Findings of the Gloucestershire Affordability Model indicate that under Scenario A Cheltenham would experience a 71% increase in affordable housing need. It's true to say that under all Scenarios affordable housing need grows and is not fully addressed, but this falls as the level of new strategic sites in addition to urban capacity is released. For example under Scenario B whilst there would still be an increase in need, this would have reduced to 45%, Scenario C 28% and Scenario D 25%.
- 3.33** A key issue for the consultation however is that whilst the JCS will make a step change in affordable housing provision, the number of affordable homes required will still far exceed the overall annual delivery rate – The JCS needs to address how this will be managed. A draft development management policy is included within the emerging JCS document relating to affordable housing (Proposed Policy B: Meeting affordable housing needs) and views will be sought through the consultation period on how innovative this policy can be whilst still enabling viable developments to be brought forward.
- 3.34** From an economic perspective Scenario A would not deliver new employment locations, whilst it is true that not all new employment uses will result in new space requirements, the JCS evidence base identifies a range of between 12 hectares and 23 hectares of new employment land over the JCS plan period for Cheltenham Borough. On the evidence currently available, together with negotiations on planning applications to date this cannot be delivered within the built up urban boundary of the Cheltenham.

3.35 It is the professional advice of officers that Scenario A is not a sound or robust scenario to progress at examination. This Scenario fails to respond effectively to the JCS evidence base including housing review and employment land requirements. Taking account of where we are in the JCS process, together with the evidence base currently available it is the professional advice of officers that further testing of Scenarios B – D is required, but that Scenario B appears best to meet the development needs of Cheltenham and the wider Joint Core Strategy area over the plan period.

3.36 ***Development management policies***

A number of development management policies have been drafted for consultation and illustrate how the vision and development strategy could be delivered. These policies would provide the strategic framework for more detailed local planning policies contained within future local plans of each Joint Core Strategy 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.

3.37 At this stage draft policies are concerned with development strategy, settlement hierarchy, affordable housing, rural exception sites, green belt, flood risk and gypsy and traveller sites. At the next stage of consultation the strategic development management policies will also include additional policies including development phasing, infrastructure provision, delivering a continuous supply of housing, housing mix, employment, masterplanning and design.

4.0 **ALTERNATIVE OPTIONS CONSIDERED**

4.1 A number of options are included in the consultation document for public comment. The JCS evidence base has tested alternatives.

5.0 **CONSULTATION AND FEEDBACK**

5.1 A range of consultation has been undertaken to date and this is set out in appendix 2. Members have been engaged through member seminars, via the JCS Member Steering Group and regular monthly member updates circulated corporately.

5.2 The consultation document will be published on 13 December for a period of 9 weeks consultation. A detailed consultation plan is being worked on by officers; this will include press and radio coverage, publicity material distributed throughout the area, exhibitions and displays in main shopping centres and supermarkets as well as leisure centres, libraries and farmers markets. In addition there will be features in the newsletters and websites of the three councils. Meetings and workshops are being planned with town and parish councils, working with the Gloucestershire Rural Community Council. Officers are currently exploring the scope to engage with groups which are generally harder to reach or excluded from consultation processes such as ethnic and minority groups, and both the young and older age groups. As the strategy is looking at proposals that will affect homes and jobs over the next 20 years, officers are particularly keen to try to involve young people in the consultation.

5.3 Whilst the JCS needs to be a document that will stand up to the scrutiny of a public examination and must be prepared in line with statutory regulations, it is equally important that it can be understood by the local community so consultation and publicity material will be prepared in Plain English and try to avoid the use of planning jargon as far as possible.

6.0 **NEXT STEPS**

6.1 ***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.

6.2 The timetable for the production of this development plan document can be viewed on the dedicated Joint Core Strategy website at www.gct-Joint Core Strategy.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

6.3 Should agreement by the 3 Councils be reached on the publication of the draft “Developing the Preferred Options Consultation Document” by the end of November 2011, then the report attached as appendix 1 to this report will be converted into a document suitable for public consultation. This will include any amendments arising from the report through the debate at the 3 Council meetings together with a set of key questions to help guide consultation. These key questions will be agreed with the JCS Member Steering Group.

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Appendices	<ol style="list-style-type: none"> 1. Developing the Preferred Options: Consultation Document 2. Response Report on Consultation Carried Out to Date (October 2011) <ol style="list-style-type: none"> 2.1. Appendix 1 of Response Report 3. Sustainability Appraisal <ol style="list-style-type: none"> 3.1. Appendix 1 of Sustainability Report 3.2. Appendix 2 of Sustainability Report 3.3. Appendix 3 of Sustainability Report 3.4. Appendix 4 of Sustainability Report 3.5. Appendix 5 of Sustainability Report
Background information	JCS evidence base www.gct-Joint Core Strategy.org