

**Joint Core Strategy  
Response Report on Consultation Carried Out to Date  
Issue: October 2011**

**Contents**

**A. Introduction and methodology**

1. Introduction
2. Statement of Community Involvement / JCS Consultation Statement
3. Issues and Key Questions:
  - Public exhibitions
  - Publicity for the exhibitions
  - Parish Council events
4. Part 1 – Online consultation

**B. Issues and Key Questions - Consultation event responses**

5. Interactive maps
6. Post-it notes
7. Short questionnaires
8. Parish Council discussions

**C. Issues and Key Questions: Written representations and JCS responses – Issues and Key Questions**

9. Direction and content of the JCS
10. Strategic objectives
11. Vision and priorities for the JCS area
12. Sustainability
13. Housing
14. Employment
15. Urban and rural issues
16. Sustainable urban extensions
17. Deliverability and phasing
18. Flooding
19. Green infrastructure

20. Site-specific recommendations

21. Recommended reading

#### **D. Part 1 online consultation and JCS responses**

22. Purpose of online consultation

23. Summary of responses received

#### **E. Outcomes of the consultation activities**

24. Common ground and competing viewpoints – Issues and Key Questions consultation

25. Common ground and competing viewpoints – Part 1 Online Consultation

26. Consultation activities in 2011

27. Next steps

28. Lessons learnt

#### **Appendices (located on JCS website)**

APPENDIX A – Public events attendance log (Issues and Key Questions consultation)

APPENDIX B – Public events short questionnaire (Issues and Key Questions consultation)

APPENDIX C – Interactive maps (Issues and Key Questions consultation)

APPENDIX D – Summary of post-it note responses (Issues and Key Questions consultation)

APPENDIX E – Locations identified as suitable for development in short questionnaire (Issues and Key Questions consultation)

APPENDIX F – Parish Council events attendance log (Issues and Key Questions consultation)

APPENDIX G – Parish Council priorities (quoted from *Parish Councils Consultation Report*)

APPENDIX H – Constraints maps

APPENDIX I – Strategic objectives (quoted from *Issues and Key Questions Consultation Document*)

APPENDIX J – Online questionnaire (Part 1 consultation)

APPENDIX K – Spatial Portrait (Part 1 consultation)

APPENDIX L – Key Issues (Part 1 consultation)

APPENDIX M – Vision (Part 1 consultation)

APPENDIX N – Developing the Spatial Options: Stakeholder and Parish Council consultation.

# Joint Core Strategy Consultation Response Report

## A. Introduction and summary of activities

### 1. Introduction

The Joint Core Strategy (JCS) is a partnership between Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council. The Councils will produce a co-ordinated strategy guiding how the three authority areas develop up to 2031. It will set out their approach to dealing with climate change, protecting and enhancing the natural and historic environment, and establishing the location and timing of new housing, employment, key infrastructure, community, leisure and tourism facilities.

Preparing a Joint Core Strategy means making choices about how the area will develop, so it's important that local communities are involved and have a say in the future of their area. To ensure the JCS incorporates local opinions, as well as meeting Government tests of soundness, extensive consultation exercises have been conducted and will continue through the strategy's development.

The final version of the JCS is being prepared in two parts. Part 1 will include:

- An introduction to the JCS area, providing clear sense of place.
- A clear 'Vision' for how the JCS area will be in 2031 and
- 'Strategic Objectives' that must be fulfilled to achieve the Vision.

Part 2 will consist of the development strategy and policies designed (in response to the JCS evidence base and all consultation) to achieve the Vision.

Prior to writing the first part of the JCS, an *Issues and Key Questions* consultation document was published in 2009/2010, which was intended to generate debate before detailed options were developed.

Public consultation on the *Issues and Key Questions* document ran from 23<sup>rd</sup> November 2009 to 19<sup>th</sup> February 2010. The authorities then undertook a number of stakeholder consultations with Parish Councils, discussing both the *Issues and Key Questions* document and the public's response to it. The stakeholder consultation results can be found in appendix N of this report.

The second phase of consultation consisted of an online consultation on *Part 1* of the JCS document which was in response to the feedback of the *Issues and Key Questions* consultation. This focussed on the vision and objectives of the JCS and the preferred strategy. This consultation was published for eight-weeks between 14<sup>th</sup> June and 9<sup>th</sup> August 2010. A total of 76 organisations and individuals responded providing a total of 297 comments.

This report summarises the activities undertaken and the findings of the work to date, and will become part of the JCS evidence on which policy is based. The first half of the report focuses on the *Issues and Key Questions* consultation and the latter half concentrates on the *part 1* online consultation. Further stakeholder consultation will continue in parallel with the drafting of the *Developing Preferred Options Document*. The development options will be presented for public consultation in December/January 2011/2012 followed by a further *Preferred Development Option* consultation document in the summer of 2012.

### 2. Statements of Community Involvement / JCS Consultation Statement

The approach described and implemented complies with the Statements of Community Involvement (SCI) of all three JCS authorities, and with the JCS Consultation Statement of July 2009. The latter document can be downloaded from: <http://www.gct-jcs.org/PublicConsultation/Home.aspx>

### **3. Issues and Key Questions**

#### **3.1 Public exhibitions**

The issues and key questions consultation consisted of a total of 17 manned exhibitions which were held across the three authorities (four in Gloucester, five in Cheltenham and eight in Tewkesbury Borough) between Monday 23<sup>rd</sup> November and Saturday 12<sup>th</sup> December 2009. To ensure good attendance, exhibition locations were chosen to cover as much of the JCS area as possible, and to include all key settlements at times convenient for the public.

Approximately 911 people attended the manned exhibitions, further details of which are provided in Appendix A. Officers in attendance answered queries, facilitated debate, and encouraged formal written/online response from visitors. Information and opportunities for interactivity were provided as follows:

- Branded banners
- Posters explaining the JCS and the nature of the consultation
- The 'Issues and Key Questions' document
- An Executive Summary of the document, presented as an A5 booklet
- A5 promotional leaflets
- Interactive A1 map of the JCS area (see section 6, below)
- Post-it notes for sharing ideas (see section 7, below)
- A4 questionnaires (see section 8, below)
- Reference map of constraints in the JCS area
- JCS database registration cards

In addition to the manned exhibitions, 25 unmanned exhibitions were held between Monday 23<sup>rd</sup> November 2009 and Friday 19<sup>th</sup> February 2010. These were held to raise awareness of the JCS and give the public a further opportunity to contribute. Unmanned exhibitions were held at university campuses, colleges, council offices and libraries. A selection of the material described above was available to read and to take away.

#### **3.2 Publicity for the exhibitions**

The JCS public consultation was publicised through the Councils' websites, the JCS website, Council magazine articles and official press notices. Letters were sent to all groups and individuals on the JCS database informing them of the consultation and how to get involved. Furthermore, letters and documents were sent to specific consultees, promotional posters were distributed to supermarkets and doctors surgeries, and the team worked with local media to generate free publicity.

Press and radio coverage included radio interviews, multiple newspaper reports, plus articles in local/parish magazines and newsletters.

Sample headlines from the Gloucestershire Echo include:

- "One voice on Gloucestershire's housing needed" – 19th November 2009
- "Have your say on future plans for Gloucester, Cheltenham and Tewkesbury" – 19th November 2009
- "Good public reaction to future plans for Cheltenham, Gloucester and Tewkesbury" – 26th November 2009
- "Have your say: Where should new houses be built in Gloucestershire?" – 27th November 2009
- "Tewkesbury Borough residents urged to have their say as exhibition moves to the town" – 7th December 2009
- "Publicity call over Gloucester housing plans" – 10th December 2009

### 3.3 Parish Council events

Five events were held as follows:

#### **Cheltenham**

- Monday 22nd February, 2-4pm, Municipal Offices, Pittville and Montpellier Room
- Wednesday 24th February, 5-7pm, Municipal Offices, Montpellier Room

#### **Tewkesbury**

- Tuesday 23rd February, 2-4pm, Tewkesbury Borough Council, Council Chamber
- Tuesday 23rd February, 5-7pm, Tewkesbury Borough Council, Council Chamber

#### **Gloucester**

- Thursday 4th March, 5-7pm, Gloucester City Council, North Warehouse, Committee Room 1

The five events were attended by a total of 40 representatives from 23 Parish Councils. A further 11 Parish Councils declined to attend having already submitted formal written representations to the public consultation, leaving 20 Parish Councils which did not engage with this stage of consultation.

The content and format of each of the five events was the same, reflecting the partnership approach to the JCS, though there was inevitably some local bias to discussion at each venue. Parish Councils were invited to attend the meeting geographically closest to them (regardless of Borough/City boundaries), but were welcome at any convenient event.

Each event began with an introductory presentation covering:

- The JCS context and programme
- Key issues raised during the public consultation
- Maps showing areas the public had highlighted as appropriate and inappropriate for new development (see Appendix C)
- Constraints maps for the JCS area (including the Area of Outstanding Natural Beauty (AONB), Flood Zones and Green Belt – see Appendix H).

Participants were then given more detail of public responses to the consultation, and asked to discuss and debate associated issues in a structured format based on eight themes: vision, sustainability, housing, employment, city/town centres, sustainable urban extensions, flooding and green infrastructure.

## 4 Part 1 – Online consultation

The Part 1 public consultation consisted of an informal online questionnaire which was published on the JCS website. Participants were given eight weeks to comment and could complete the questionnaire online or by post. The format of the questionnaire allowed respondents to answer 'Yes', 'No' or 'Other' with space below to provide further detail/comments as preferred.

The latter part of this report summarises the results of the *Part 1* consultation, in line with the five parts of the questionnaire: Spatial Portrait, Key Issues, Vision, Strategic Objectives, and general comments. This is followed by areas of common ground and disagreement.

# Joint Core Strategy Consultation Response Report

## B. Consultation event responses – Issues and Key Questions

This chapter of the report will identify the findings of the *Issues and Key Questions* consultation. Chapter B will focus on the key responses which were received whilst using interactive maps, post-it notes, short questionnaires and parish council discussions. Chapter C forms a response report to the written representations which were made.

### 5 Interactive maps

An A1 map of the JCS area was provided at each public exhibition, and visitors were invited to place green dots where they feel development is appropriate and red dots where it is inappropriate.

Respondents placing dots generally defined 'development' as housing, though many raised the need for supporting jobs and services too. Respondents were encouraged to 'plan positively' and put a green dot somewhere for every red dot placed (if they felt it appropriate).

The outcome of the exercise is a composite map of dots (408 green and 538 red), shown in Appendix C. At first glance, red and green dots appear to be located in the same places, but on closer analysis there are marked differences. Some of the findings from this exercise are outlined below.

- Support for development within the major urban areas, plus Highnam and Stoke Orchard.
- Opposition to development on the urban fringes including South Cheltenham, Bishops Cleeve, Tewkesbury and Northway.
- Mixed views over development in North West Cheltenham with some respondents seeing it as the best location for growth if growth must happen, while there was strong opposition to such a move from other individuals and from groups including Save the Countryside and LEGLAG.

### 6 Post-it notes

A total of 736 comments were collected on post-it notes across all the manned exhibitions. Respondents used the notes to share ideas and concerns, sticking them to exhibition materials in public view. The notes were logged according to their place of origin, and categorised by type. Issues raised include:

- Concern over the scale, nature and need for growth proposed by the emerging South West Regional Spatial Strategy
- Concern over possible green belt changes
- The need to maximise development and regeneration opportunities within existing urban areas
- Flood prevention
- Public transport improvements
- The need for affordable housing
- Conservation and use of open spaces
- Recommendations for the development of specific sites.

A more detailed summary of these responses is provided in Appendix D. The comments summary shows the broad range of ideas and concerns raised by the public.

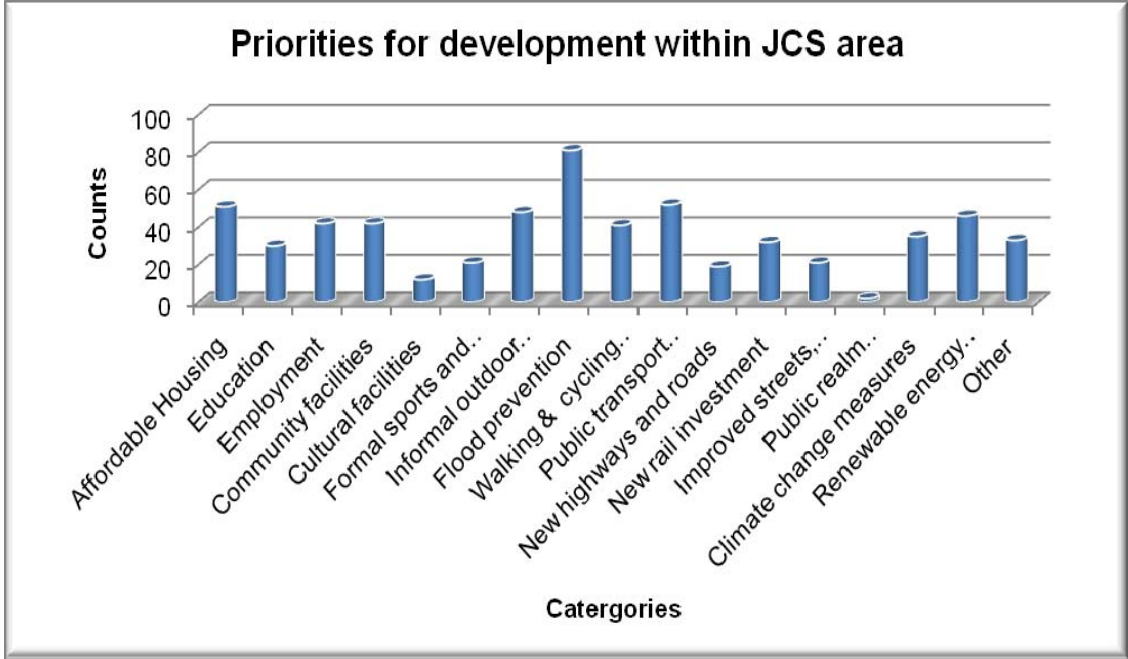
### 7 Short questionnaires

A short, printed questionnaire was provided at exhibitions, to capture the views of people who had an interest in the area/project. The questionnaire consisted of seven sections covering priorities for

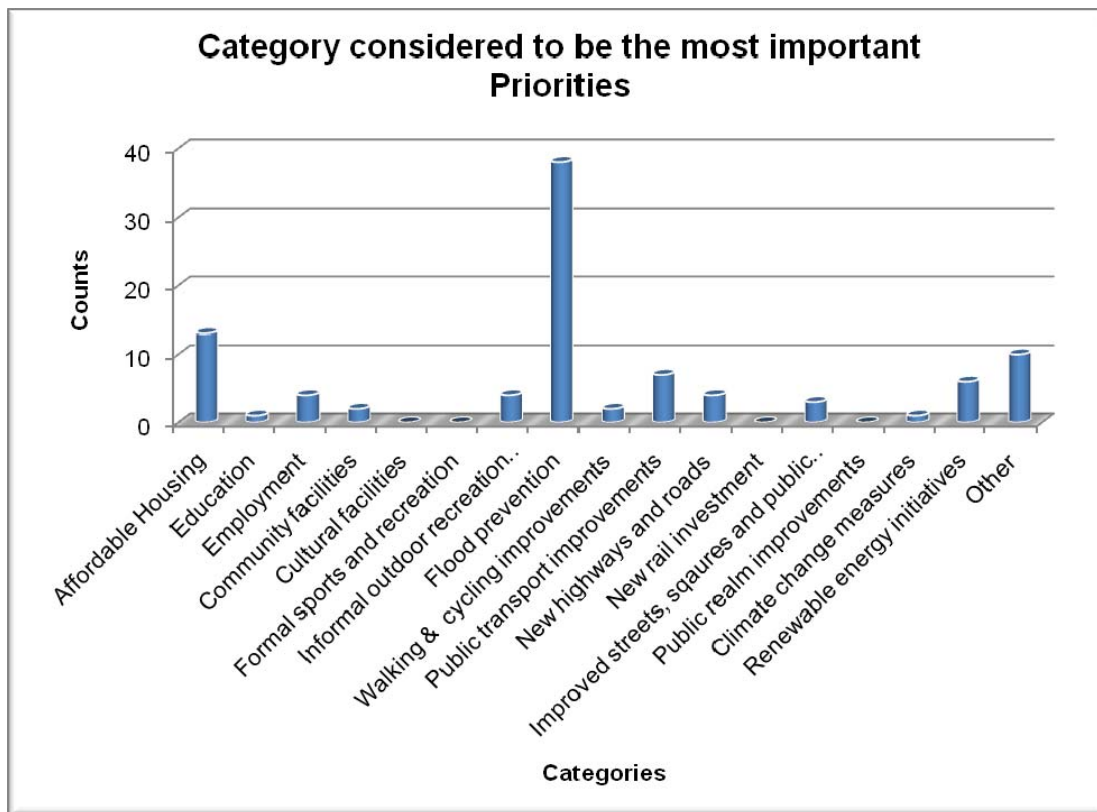
development and how and where development should be accommodated. A blank copy is provided in Appendix B.

The authorities received 110 completed questionnaires, a summary of which follows below.

Respondents were first asked to select up to six priorities for development in the JCS area. The chart below shows the number of responses for each option provided. The most common response was flood prevention with 81 votes, followed by public transport improvements, affordable housing and 'informal outdoor recreation and general open space'. Public realm improvements and cultural facilities received the fewest votes.



Respondents were then asked to choose their **top** priority from the six they identified previously. Flood prevention was the most important with 38 responses, followed by affordable housing, public transport improvements and renewable energy initiatives:



When asked whether urban areas should accommodate growth, 27 of the 110 respondents did not think urban areas should grow at all, but the majority took the view that if growth was going to happen it should be delivered by:

- Maximising opportunities within existing urban areas
- Higher density development
- Re-use of derelict brownfield sites, empty properties and council-owned sites, particularly for affordable housing.

Respondents considered that development should be near to transport routes and well-provided for in terms of infrastructure. Many respondents did not want to see development on greenfield/Green Belt sites, or sites of ecological importance, and certainly not in flood risk areas.

One respondent suggested that a small new town should be considered, and four respondents thought northwest Cheltenham could be suitable for development. It was also felt that small settlements would benefit from a limited number of additional houses, with fewer still in the smallest rural villages. Such development in rural areas was seen as helping to support the communities and their services, and providing affordable housing for young people, but without destroying the character of the area.

Respondents were asked to identify where they felt development would be suitable if it were to happen. Responses are listed and mapped in Appendix E.

Finally, respondents were asked which issues had been missed. These were identified as follows:

- Green/open spaces
- Wildlife and biodiversity
- Rural issues (including food production and public transport)
- Support for small businesses (including tourism) and encouraging sustainable commercial development
- Facilities for children and teenagers
- Design of new development (e.g. low energy housing and adaptability of housing to accommodate changing lifestyles)



- Health and community aspects, such as tackling poverty and deprivation
- Parking (including for lorries)
- Gypsy and traveller pitches
- Sustainable transport initiatives e.g. car clubs

## 8 Parish Council discussions

Parish Councillors attending the events endorsed the issues raised by the public and debated their own priorities. A separate report was written on the Parish Council events which is included in Appendix G. In addition, a short summary appears below:

### **Vision**

- Focus on local community needs, not just regional housing targets.
- Protect the environmental, rural and urban characteristics that make the JCS area (and the separate and distinctive places within it) an attractive place to live and work.
- Address rural and urban areas/issues in a balanced way.
- Encourage sustainability/green living and prepare for climate change.

### **Sustainability**

- Create integrated, self-sufficient communities.
- Maintain local and rural services.
- Support local food and green energy production.
- Improve energy efficiency of existing housing stock and new-build.
- Provide sustainable transport options including public transport and cycle routes.

### **Housing**

- Concern was expressed over the scale and nature of housing need in the RSS.
- Use previously-developed land as a priority, and bring empty properties back into use.
- Link new housing provision to job creation.
- Provide adequate levels of affordable housing, including intermediate ownership schemes, within existing settlements not just urban extensions.
- Ensure new housing is: energy efficient; of high quality design and space standards; and planned to create mixed/balanced communities.

### **Employment**

- Foster local specialisms, and develop a skilled local workforce.
- Balance manufacturing and service industries (including green / high-tech).
- Support agriculture and farm diversification.
- Provide incubator units for new businesses.
- Encourage home-working – e.g. through broadband provision.

### **City and town centres**

- Regenerate/improve Cheltenham, Gloucester and Tewkesbury centres.
- Provide a better mix/range of quality chain stores and independent shops/markets supported by attractions other than retail (e.g. festivals, culture) and good quality public spaces.
- Halt out-of-centre retail development.
- Provide better access by public transport from rural areas. Promote pedestrian/cycle access and movement. Support well-placed park and ride schemes. Address parking costs.
- Make better use of vacant shop units, and empty properties above shops.

### **Sustainable urban extensions**

- Concern was expressed over the form, location, need and evidence for urban extensions.
- Protect the Green Belt and avoid coalescence of settlements. Re-use brownfield sites and empty buildings before greenfield sites.
- If development does go ahead, ensure it provides adequate social, physical and transport infrastructure to support itself, as well as addressing existing local deficiencies and flood risk.

### **Flooding**

- New development must not increase (and should reduce) flood risk to existing properties.

- Flood zones should be defined with a margin to account for climate change, and should incorporate local knowledge. There should be no building on the defined floodplain.
- Flood risk assessment and flood defences must account for both fluvial and pluvial flooding.

**Green infrastructure**

- Protect the AONB, Green Belt, woodlands, productive agricultural land, playing fields, allotments, disused railways, parks and open spaces etc.
- The Green Infrastructure approach was endorsed: connecting and managing all green spaces for free access and multi-functional use by all.

# Joint Core Strategy Consultation Response Report

## C. Issues and Key Questions: Written representations and JCS responses

The 'Issues and Key Questions' document was available online throughout the consultation period, allowing comments to be submitted interactively. People were also able to respond by letter or email, with hard copies of the document sent to Parish Councils and made available to view at deposit locations across the three authority areas.

When the consultation period closed on 19<sup>th</sup> February 2010, responses had been received as follows:

- Online – 28
- Email – 181
- Post – 163
- In addition, 380 letters and forms were received in connection with campaigning by Save the Countryside and Leckhampton Green Land Action Group (LEGLAG).

Together, these responses add up to more than 2,500 representations on individual topic areas – the exact number is impossible to quantify due to the inter-related nature of issues raised. All the representations are summarised in sections 10 to 22, below.

### **PLEASE NOTE BEFORE READING:**

#### **Methodology**

*A qualitative approach was adopted for the analysis in an effort to present a balanced view of the diverse opinions expressed, highlighting areas of agreement and conflict. The report has extracted these issues for discussion.*

#### **Sources**

*All representations are reported anonymously. Each of these individual responses are an overview of the main points which have been raised to those questions asked.*

#### **Regional planning**

*As noted on page 6, this report was written when significant questions remained unanswered on regional planning, the emerging South West Regional Spatial Strategy, and Regional Planning Guidance 10. The new coalition government has promised major changes to regional planning and the planning system as a whole, but has not yet clarified details of the new regime. Such changes will of course be considered as they become clear throughout the development of the JCS. In the meantime, this document reports on issues associated with regional planning and the RSS as they were raised by respondents. More recently, the government have published the National Planning Policy Framework (NPPF) which is subject to public consultation and is expected to be formally adopted by April 2012. The NPPF will replace planning policy guidance and planning policy statements. The JCS will address the NPPF as it evolves following public consultation.*

#### **Transport, waste and education**

*Transport, waste management and education are the responsibility of UK county councils, and are outside the remit of district authorities and the JCS. Accordingly, these issues are not specifically addressed below, but are discussed under related sections (such as 'Housing' or 'Urban and rural issues') for which the JCS does have responsibility.*

*Representations made to the JCS on county responsibilities have been shared with Gloucestershire County Council. Indeed, the JCS authorities worked closely with the County Council in supporting their parallel development of the Strategic Infrastructure Delivery Plan (SIDP). The purpose of SIDP was to assess transport, education, health care and a wide range of other infrastructure issues, resulting in a costed schedule of requirements for incorporation in local Development Plan Documents. Whilst completion of SIDP was prevented by the government's decision to revoke Regional Spatial Strategies some of the basic work undertaken has been helpful in informing development of JCS preferred options for consultation. Further information on the SIDP can be found here:*

*<http://www.gloucestershire.gov.uk/index.cfm?articleid=95428>*

## 9 Direction and content of the JCS

Respondents, including members of the public, statutory consultees, the Local Strategic Partnership (LSP) and the development industry, all expressed support for the principal of joint working between the three JCS authorities.

There was general agreement among respondents calling for the JCS to:

- Facilitate development that makes a positive contribution to the local environment, economy and community. Support and create sustainable, self-sufficient communities.

Officer response:

Agree – The JCS will work towards creating new sustainable communities.

- Protect the environmental, rural and urban characteristics that make the area (and the separate and distinctive places within it) a unique and attractive place to live, work and visit.

Officer response:

Agree – The unique character of the JCS area has been taken fully into consideration when identifying strategic new development areas within the JCS.

- Address rural and urban areas/issues in a balanced way.

Officer response:

Noted – The need for development in the JCS area is predominantly driven by population growth from within the urban areas. Growth within the rural areas is proposed by the JCS however the focus of new housing and employment development will be adjacent to the existing centres.

- Avoid focusing on land-use planning and urban regeneration to the detriment of social issues such as healthy lifestyles, educational attainment, community safety/crime/fear of crime, affordable homes for everyone, and meeting the needs of an ageing population.

Officer response:

Noted – these issues are taken into consideration by Sustainability Appraisal in order to ensure that new development takes into consideration social, economic and environmental factors. More detailed policies in the Preferred Options document will address these issues.

- Address inequalities in wealth, housing, education, employment and infrastructure provision.

Officer response:

Agree – New development across the JCS area will help provide more affordable housing, and more employment land thereby helping to reduce inequalities with regard to access to housing and employment. Developer contributions to public transport, highway infrastructure and education will also be sourced from new development.

- Support the shift to a low-carbon economy.

Officer response:

Agree – The JCS will promote sustainable development and support the shift to a low carbon economy.

- Encourage sustainability/green living and prepare for / adapt to / mitigate climate change, for example by: addressing flood risk; supporting appropriate renewable energy production; supporting local and community food production; minimising the need to travel and promoting sustainable transport options.

Officer response:

Agree – The proposed JCS Strategic Sites have all been selected for their ability to contribute to the aforementioned outcomes.

- Provide for high design standards in all new development, regeneration and refurbishment, from major projects to street furniture.

Officer response:

Noted - More detailed policies in the Preferred Options document and subsequent JCS authority Local Plans will address strategic design issues..

- Collaborate with neighbouring authorities at all scales (local, county and regional).

Officer response:

Agree – Neighbouring authorities within the County have been partners in econometric modelling. Out of county neighbours have been included in ongoing consultation.

- List all evidence and source documents.

Officer response:

Agree – This can be found on the JCS website

There was a marked split in opinion on housing provision (discussed in detail in section 14, Housing) with many respondents calling for the JCS to:

- Focus on local community needs, not just regional housing targets, and ensure a balanced approach to provision of employment, housing and social infrastructure.

Officer response:

Noted - The housing need figures have been produced from local population projection work and the Gloucestershire Affordability Model will be used to ensure housing and employment provision are balanced accordingly

- Protect environmental designations and restrict urban sprawl.

Officer response:

Agree – The strategic development sites identified seek to safeguard other areas that are subject to statutory nature conservation or high levels of landscape sensitivity. Urban sprawl is restricted by providing development at several sites around the existing main centres in a plan led approach rather than in an unplanned manner. Plan led growth is not urban sprawl.

- Direct development to brownfield sites before Greenfield.

Officer response:

Noted: In order to secure a mix of types and tenures of dwelling units and employment accommodation it will be necessary to provide greenfield land alongside the continued promotion of central regeneration sites.

However, the development industry called for the JCS to:

- Adhere to the growth projections in the emerging South West Regional Spatial Strategy (the RSS) such that new homes are provided to satisfy the demands of the current and future population “to support greater economic prosperity and address housing affordability”.

Officer response:

Noted: With the Coalition Government abolishing the RSS development requirement numbers have now been determined locally. Locally derived projection outputs are not dissimilar to RSS projections. A wealth of work has been undertaken by the JCS authorities to identify the most sustainable locations for strategic growth. Proposed strategic sites have emerged therefore from the culmination of much locally based evidence and research work.

- Provide for such growth in a sustainable and deliverable way, acknowledging the need to review the Green Belt.

Officer response:

Agree: An independent Green Belt Review has been carried out to inform the Developing Options Preferred Consultation and comprises part of the evidence base. All strategic development sites identified are considered to be the most sustainable and deliverable options. Further assessment of the Green Belt will be undertaken to establish whether additional development can be accommodated within the Green Belt areas.

## 10 Strategic objectives

Thirteen strategic objectives for the JCS were listed in the consultation document (see Appendix I) and were generally well-supported by respondents. Various specific text edits were recommended in line with issues described in section 10 (above) and throughout this document. General and conceptual criticisms of the strategic objectives were raised as follows:

- All objectives should be: specific, measureable, achievable, relevant and set within a time frame (SMART). The respondent suggested that the strategic objectives as currently drafted would fail these tests, appearing to be “a re-statement of the issue and vision”.

Officer comment:

Agree – JCS objectives are currently being developed in this manner.

- The objectives restate the requirements of the RSS and then suggest unrealistic options that include ignoring the requirements of the RSS.

Officer comment:

*Noted. Development requirements within the JCS area have been identified by using local data sources in the knowledge that the RSS is proposed to be abolished.*

- The objectives do not focus sufficiently on the key issues (as required by Planning Policy Statement 12): the economy, jobs and housing need.

Officer comment:

*Agree – JCS objectives have been reviewed accordingly.*

- Biodiversity should be protected, managed and enhanced for its own sake: a Green Infrastructure Strategy is not the only way of doing so. The development of increased access to green spaces is a separate issue which requires its own objective. Furthermore, the JCS must provide for the recreation of lost wildlife habitats, in addition to conservation.

Officer comment:

*Agree – JCS objectives have been reviewed accordingly.*

- Strategic objective 3 received the greatest level of criticism; it appears in the consultation document as follows:

*“If the Regional Spatial Strategy for the South West is published it will be necessary to meet its requirements in the provision of new homes that meet the variety of housing needs across the Joint Core Strategy area and, in particular, ensuring that the provision of new homes facilitates the attraction and retention of skilled people to ensure economic growth.”*

Criticism of this objective was addressed as follows:

- The language and tone used is negative and defensive. The objective should be framed positively and should set as an objective the delivery of sufficient new housing to meet the needs of the expanding population and ensure greater affordability for all sectors of the community. The JCS should support the delivery of housing in order to meet the needs of the area (as quantified through solid evidence), and should not imply that the delivery of new housing is a forced obligation through the RSS.

Officer comment:

*Agree – Development requirements within the JCS area have been identified by using local data sources in the knowledge that the RSS is proposed to be abolished.*

- Unqualified support for undifferentiated economic growth is not always a good thing – rather there should be a proper understanding of what genuinely sustainable economic development will mean.

Officer comment:

*Noted.*

Additional strategic objectives were suggested for consideration as follows:

- To safeguard the strategic resource of best and most versatile agricultural land, by avoiding development on all land used for agriculture and by restoring land which has fallen into disuse.

Officer comment:

*Agree – JCS objectives have been reviewed accordingly.*

- To promote, protect and enhance the vitality and vibrancy of the area's city and town centres.

Officer comment:

*Noted. This will be part of the strategy with Gloucester Heritage Urban Regeneration Company and Cheltenham Development Taskforce support.*

- To seek delivery of additional renewable energy generation capacity in the JCS area.

Officer comment:

*Noted. The JCS recognises the threats from Climate Change and will address this within the strategy.*

- To provide a sufficient quantity and range of housing to ensure that local needs and demands are met throughout the plan period.

Officer comment:

*Noted. Development requirements within the JCS area have been identified by using local data sources.*

- To direct development to locations which can best deliver sustainable development having regard to accessibility, the availability of infrastructure and the absence of strategic constraints.

Officer comment:

*Noted. This is dealt with by a number of objectives in terms of sustainability.*

- To secure the comprehensive regeneration of vacant/underused brownfield land (as opposed to the sites being tested simply as opportunities to deliver a given quantum of housing or employment).

Officer comment:

*Noted. Urban regeneration initiatives are already being promoted through Gloucester Heritage Urban Regeneration Company and Cheltenham Delivery Taskforce.*

- To provide safe walking or cycling to a wide range of shopping, employment and community facilities as a key element of a sustainable, low carbon future.

Officer comment:

*Noted. This is dealt with by a number of objectives in terms of sustainability.*

## 11 Vision and priorities for the JCS area

Respondents suggested that the JCS area, its residents, workers and visitors should enjoy:

- A high quality of life with improved open spaces, education, health and leisure, plus high public safety and low fear of crime.

Officer comment:

*Agree*

- Thriving rural and urban communities, engaged with planning their own futures.

Officer comment:

*Agree*

- Protection from flooding, and the mitigation of flood impact.

Officer comment:

*Agree*

- A mixed economy (agriculture, manufacturing and services), and a highly-skilled workforce attracting inward investment.

Officer comment:

*Agree*

- Affordable, well-designed housing for all – urban and rural – in mixed communities with good access to services and employment.

Officer comment:

*Agree*

- Good road/rail infrastructure and traffic management, plus better public transport, walking and cycling routes.

Officer comment:

*Agree*

- Good access to the countryside and green spaces.

Officer comment:

*Agree*

Respondents pointed out that the strategic vision should reflect the respective Sustainable Community Strategies and Community Safety Strategies of the three authorities. Many respondents also

suggested that the overall strategic vision should be complemented by separate visions for specific places/areas in response to the diversity of issues at different locations. For example:

- Gloucester's vision may centre on urban regeneration;  
*Officer comment*  
*Noted and a revised version of the vision will address this point.*
- Cheltenham's vision may centre on finding an acceptable suite of provisions to meet housing and employment needs; and  
*Officer comment*  
*The revised vision will look at separate parts of the JCS area but not down to the level of individual settlements outside of the main centres*
- Tewkesbury's vision may centre on improving its attractiveness as a historic market town.  
*Officer comment*  
*Noted*
- A specifically-rural vision was suggested (in response to criticisms of its absence) as follows:

Some respondents suggested separate visions are also required in areas targeted for growth by the RSS, for example Bishops Cleeve.

Respondents were asked to give their priorities for delivery through development. Many respondents criticised the use of prioritised lists, highlighting the interdependency of items likely to appear on them; citing site-specific variations and the need to consider sites individually; and querying the definition of 'development' in this context. Other respondents suggested the single priority is to meet the development requirements of the RSS. In acknowledgement of these criticisms, the following development outcomes are identified (in no particular order) as of greatest interest to respondents:

- Flood protection and mitigation
- Affordable housing
- Social/community facilities and infrastructure (including education)
- Sensitive regeneration of town and city centres
- Employment
- Climate change adaptation and mitigation measures
- Renewable energy initiatives
- Public transport
- New roads and highways
- Walking and cycling improvements
- Public realm improvements
- Formal and informal open and recreational space
- Community safety
- Waste reduction and management

*Officer comment*

*These are all legitimate issues which need to be considered in the preparation of the JCS. All of the potential scenarios to be presented as options will be tested against a wide range of sustainability and strategic objectives, including those in the list above.*

## 12 Sustainability

There was support for the JCS leading the way in preparing for and mitigating the impact of climate change. Respondents indicated that the JCS should address social, economic and environmental sustainability (known as the 'three pillars of sustainability'). Many respondents showed a good understanding of the need to incorporate sustainability into all aspects of the JCS, and not to view it as an 'add-on'. Accordingly the three pillars inform all of the sections in this chapter, but some specific comments are highlighted here with respondents calling for the JCS to:

- Avoid urban sprawl and the accompanying loss of productive land, loss of amenity space, increased traffic congestion and pollution, increased flood risk, and the negative impact on the Cotswold Area of Outstanding Natural Beauty (the AONB). Many respondents highlighted our responsibilities to future generations in this respect.

*Officer response:*

*Noted – The JCS seek to protect these designations wherever possible.*



- Maintain local and rural services – including through the development of new housing, services, community facilities and wider infrastructure at an appropriate scale to existing settlements.

Officer response:

*Agree – Moderate development in rural areas can help to retain rural services.*

- Support local food production – including through vegetable-growing schemes, provision of allotments, support for local shops/farmers, and preservation of productive agricultural land (preventing development on ‘best and most versatile’ (BMV) agricultural land: grades 1, 2 and 3a). Many respondents expressed concern over future food security in the UK and the corresponding need to preserve agricultural land.

Officer response:

*Agree – The JCS will seek to protect high quality agricultural land to enable local food production to continue.*

- Design to reduce energy consumption, and support local green energy production through:
  - Conducting a Renewable Energy Viability Assessment
  - Micro-generation
  - Hydro power
  - Solar and photovoltaic power
  - Air and ground source heat pumps
  - Geothermal power
  - Biomass boilers and use of woodfuel in association with woodland management
  - Combined heat/power plants
  - Energy-from-waste
  - Setting targets for renewable energy production on new developments (e.g. 70%). This approach was opposed by some who recommended that the JCS seeks a reduction in *overall* carbon emissions rather than focusing on one approach.
  - Most respondents advocated the “measured proactive” approach described in the consultation document (as opposed to “business as usual” or “very proactive” options), however this was criticised by energy professionals as an artificially constructed middle-ground with no basis in policy.
  - Several respondents highlighted the potential employment benefits of green technologies and energy production – see section 15, Employment.
  - There were mixed views on the need for and impact of wind turbines and the proposed Severn Barrage. There is a clash in many respondents’ high prioritisation of renewable energy initiatives and their reluctance to accept intrusive projects.

Officer response:

*The JCS will ensure that strategic developments are designed to reduce energy consumption and support local green energy production.*

- Improve the energy efficiency of existing housing stock and new-build. Many respondents called for the JCS to consider setting targets beyond those of central government policy and building regulations. However, the development industry highlighted the ambitious nature of targets already set, the need to consider viability, and the statutory requirement for any departure from national policy to be justified by evidence (in this and other areas of concern).

Officer response:

*Noted: The JCS will have a duty to respond to national targets; therefore local targets are most likely not be set. The national planning policy framework encourages authorities to consider the viability of developments when determining applications, therefore, exceeding government sustainability targets could potentially make developments unviable.*

- Reduce the need to travel and provide sustainable transport options including public transport and cycle routes/parking – but the JCS must acknowledge the likely continued dominance of the private car in rural areas. Concern was expressed for the Councils’ failure to enforce corporate green travel plans, and for the expense of using local park and ride schemes.

Officer response:

*Noted.*

- Create integrated, self-sufficient and sustainable communities through a combination of all the above and other initiatives.

Officer response:

*Agree – the broad locations will be located in sustainable locations which will provide new infrastructure whilst improving existing provisions.*

### 13 Housing

Housing was a dominant theme of discussions, with many respondents being well-informed about housing issues arising from the emerging South West Regional Spatial Strategy (RSS). Many respondents expressed significant objections to the scale and nature of new housing proposed in the RSS, but concern was also raised for housing affordability (in both rural and urban areas) with a corresponding acknowledgement of the need to accommodate demand through appropriate housing construction, balanced with initiatives to bring empty properties back into use. Many respondents expressed a strong preference for brownfield development before greenfield.

Many rural residents expressed concern for the young being priced-out of villages (resulting in divided families and aging rural populations), and for the limited opportunities to provide affordable housing in many villages. This was seen as resulting from: the lack of social infrastructure and employment in villages; the view that villages are not sustainable locations for new housing; and the fact that new affordable housing is usually provided in conjunction with new market housing, suggesting a scale of development that conflicts with many village residents' idea of what is acceptable growth.

Respondents called for the JCS to:

- Provide housing types and numbers to suit current and projected local need, not central Government targets – this to include housing for the elderly and young families for example.

*Officer response:*

*Agree – Local household projections have been produced in order to determine the amount and type of housing to come forward over the plan period.*

- Determine local housing need and secure community buy-in, for example by encouraging Parish Councils to conduct housing needs surveys to determine the target population for affordable housing and the number of units needed.

*Officer response:*

*Noted – Rural communities will have the opportunity through the Developing Preferred Options Consultation to identify whether they could accommodate growth.*

- Link new housing provision to job creation.

*Officer response:*

*Agree – Identified strategic sites in the first 10 years of the plan period will provide employment as well as housing land*

- Adopt a sequential approach, first bringing empty properties back into use (e.g. above shops), then focusing new housing provision on brownfield sites (prioritising urban areas while allowing limited development in villages). Respondents who acknowledged a need to include some greenfield development suggested it must only occur on the most sustainable sites, and must be phased to avoid undermining the preferred delivery of housing on brownfield sites (see also section 18, Deliverability and phasing). Many respondents opposed the development of private gardens for housing, while others viewed such sites as sustainable (being close to services) but requiring stringent design standards if developed.

*Officer response:*

*Noted – For the first 10 years of the plan (2011-2021) it will be necessary to release green field sites while simultaneously promoting brownfield regeneration in central areas in order to provide a mixed supply of type and tenure of housing*

- Manage affordable housing provision by setting evidence-based thresholds and targets (with a defined split between social rented and shared equity). 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) – e.g. thresholds may be lower in rural than urban areas, and selected rural sites may be allocated for 100% affordable housing, or market housing may be limited (as in Cotswold District). 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.

*Officer response:*

*Noted – The JCS will contain evidence based thresholds with regard to affordable housing requirements, this will include strategic sites.*

- Support intermediate ownership schemes and key worker housing.

*Officer response:*

*Noted – Increasing the supply of housing across the JCS area will help to improve access to affordable accommodation for all.*

- Ensure new housing is: energy efficient; of high quality design and space standards (e.g. Lifetime Homes and/or standards set by the Commission for Architecture and the Built Environment and the Royal Institute of British Architects (CABE/RIBA)); secure by design; in keeping with local character; of higher density in urban areas; and planned to create mixed/balanced communities.

*Officer response:*

*Agree – In order to be sustainable it will be necessary for new development to comply with rigorous design requirements. It is intended that the JCS will include policies on sustainable development and design.*

- Ensure developers demonstrate adequacy of infrastructure on and adjacent to development sites, such that existing residents will not suffer adverse impacts of growth. Where an adverse impact is shown, developers should fund infrastructure upgrades accordingly.

*Officer response:*

*Noted – Currently developers contribute to site related infrastructure through S.106 legal agreements. This may be replaced by a Community Infrastructure Levy across the JCS area. The need to ensure not only physical infrastructure but community infrastructure requirements are met is noted. Each planning authority will negotiate relevant contributions through the planning process based on evidenced need.*

- Ensure major new developments are assessed and provided for in terms of accessibility to acute hospital services (Gloucestershire Royal and Cheltenham General Hospitals) and the impact placed upon them in terms of increased patient numbers and distances travelled.

*Officer response:*

*Noted – All strategic sites for the first 10 year period of the plan lie adjacent to the existing urban centres, further consultation with the NHS Trusts will ascertain response times and anticipated increase in patient numbers.*

- Provide affordable housing within existing settlements, not just urban extensions. This should include provision of appropriate new housing and supporting development in villages and rural areas.

*Officer response:*

*Noted - New housing in JCS rural areas will be required to provide affordable units as identified by evidenced local need.*

- Address issues arising from high levels of second home ownership.

*Officer response:*

*Noted – This matter is not within the remit of the Joint Core Strategy although an allowance for second home ownership is made within the housing projection work.*

- Provide adequate, specialist homes for the elderly, to free-up larger homes for families.

*Officer response:*

*Noted – Where evidence points to the need for provision of specific types of accommodation the JCS will seek to provide a policy response.*

- Ensure no new housing is built adjacent to waste processing facilities.

*Officer response:*

*Agree – The impact of constraints such as cordon sanitaires has been carefully considered in the process of identifying strategic sites for new development.*

- Ensure adequate provision of children's play space in all new developments – e.g. in line with guidance from Play England's document, Better Places to Play Through Planning.

*Officer response:*

*Agree – The provision of public open space in new strategic sites will be negotiated through the development process in accordance with the POS standards of each local authority. It will also be informed by emerging green infrastructure work.*

Many members of the development industry indicated agreement with the public's suggestions regarding mixed communities and the design of new housing. Some also suggested varying affordable housing targets by site, according to local need/conditions/settlement type. However, there was a marked divergence in views on other matters. Developers highlighted the statutory requirement to consider viability in setting affordable housing targets and thresholds (PPS3, paragraph 29), and for flexibility (PPS12, paragraph 4.46), and called for the JCS to:

- Comply with national and regional planning policy, accommodating housing targets in the emerging RSS, and including an evidence-based Green Belt review to ensure delivery of sites to meet housing need (over-reliance on brownfield land being seen as a restriction on choice, viability and delivery).

*Officer response:*

*Noted – It has been necessary, owing to the proposed abolition of the South West Regional Spatial Strategy to determine housing numbers locally. A Green Belt Review has been undertaken to inform the developing preferred option consultation and is available to view on the JCS website. A further Green Belt Review is planned.*

- Provide a simple, flexible and transparent affordable housing policy, establishing a base level of provision and a set of circumstances where, if proven, the level of provision can be reduced with reference to viability.

*Officer response:*

*Noted – Please refer to the above Affordable Housing statement*

- Avoid site-specific affordable housing targets.

*Officer response:*

*Noted – Please refer to the above Affordable Housing statement*

- Balance affordable housing targets with the cost of other Section 106 priorities (e.g. education, emergency services).

*Officer response:*

*Noted - S.106 contributions are negotiated on a site by site basis between the local authority and developer. The commercial viability of a scheme may be cited as a reason to reduce requested S.106 contributions. Local authority's can undertake their own assessments of the viability of schemes to challenge evidence presented by developers. It will be for each local authority within the JCS area to determine the level of contributions sought owing to issues presenting on a site by site basis.*

- Set a threshold for affordable housing of 15 units in line with PPS3.

*Officer Response:*

*Noted – The affordable housing threshold across the strategic sites adjacent to main urban areas will be informed by the Strategic Housing Market Assessment (SHMA) which has been produced by Gloucestershire County Council working with the 6 authorities within the County. The report forms part of the JCS evidence base and can be used to assess housing need and demand in order to develop policies.*

- Provide for phased development of both brownfield and greenfield sites in acknowledgement of changing economic conditions during the plan period, and of the need to provide a range of housing sizes, types and tenures.

*Officer response:*

*Noted – For the first 10 years of the plan (2011-2021) it will be necessary to release green field sites while simultaneously promoting brownfield regeneration in central areas in order to provide a mixed supply of type and tenure of housing. Exact phasing arrangements will be set out in the preferred options document in 2012.*

- Include a viability assessment of affordable housing targets as part of the evidence base.

*Officer response:*

*Noted - A Viability Assessment will be undertaken for the JCS as a whole which will incorporate affordable housing viability.*

- Include a robust series of site allocations to be tested through the examination process.

*Officer response:*

*There is a hard focus on the first 10 years of the plan period with regard to identifying strategic sites for development in the JCS area.– For the first 10 years of the plan (2011-2021) it will be*

*necessary to release green field sites while simultaneously promoting brownfield regeneration in central areas in order to provide a mixed supply of type and tenure of housing. The development industry has been consulted with regard to the strategic suites proposed as well as on the Strategic Housing Land Availability Assessment which looks at potential sources of land for housing supply across each JCS authority. It is therefore considered that the strategic sites selected for the first ten years are robust and satisfy the tests of availability.*

See also section 18, Deliverability and phasing, below.

The consultation sought respondents' views on provision of sites for Gypsy and Traveller accommodation. Respondents called for the JCS to:

- Ensure adequate provision of sites over the whole plan period with consideration of viability and deliverability.

*Officer comment:*

*Noted - the JCS will identify and assess potential sites for the gypsy and traveller community as part of strategic allocations, having regard to both viability and deliverability.*

- Strike a balance between the needs and reasonable expectations of the settled community and local businesses, and the needs and aspirations of Gypsies and Travellers.

*Officer comment:*

*Agreed. The JCS will aim to balance and provide for the needs of all communities.*

- Encourage full use of any under-utilised existing sites (e.g. by refurbishment), then consider extension of these sites where appropriate.

*Officer comment:*

*Noted. When planning for additional gypsy and traveller sites in the JCS area regard will be to the level of local need, based on an understanding of existing site provision and estimated future needs.*

*A specific, targeted 'call for sites' for gypsy and traveller sites was undertaken between September and November 2010 whereby local communities and landowners were invited to submit sites for consideration for residential sites for the gypsy and traveller community. Moving forward, the 'call for sites' is ongoing and runs from April to March of the next year. This will provide the opportunity for the submission of potential sites for assessment, including extensions to existing sites, on an annual basis.*

- Encourage the use of vacant or unused land owned by local authorities. Make full use of the registers of unused and under-used land owned by public bodies. Exercise discretion in disposing of land for less than best consideration as set out in ODPM Circular 06/03.

*Officer comment:*

*Comment noted.*

- Provide a number of smaller sites (10 pitches or less) rather than concentrating provision in large sites or in one area.

*Officer comment:*

*Agree. Officers are aware that some traveller communities prefer to live on smaller sites of around ten pitches. Regard will be had to this when identifying and assessing potential sites for traveller communities, in consultation with representatives from the gypsy and traveller communities.*

- Develop brownfield sites before greenfield, avoiding sites at risk of flooding (due to the particular vulnerability of caravans).

*Officer comment:*

*Agreed. The JCS (and other development plan documents) will encourage the development of brownfield land before greenfield land wherever possible. In relation to flood risk, a sequential approach to site identification will be applied for different uses, in accordance with Planning Policy Statement 25 'Development and Flood Risk'.*

- Ensure good local access to schools, doctors and other essential services to reduce the need for long distance travel.

Officer comment:

*Agreed. Site identification through the JCS (and other development plans) will have full regard to sustainability objectives as set out in Planning Policy Statement 1 'Delivering Sustainable Development'.*

- Consider sites within or adjacent to (on the periphery of) sustainable urban extensions (SUEs). However timing of delivery must be considered as delivery of the SUEs is uncertain and if permitted will be a long way off. Circular 1/2006 (paragraph 12 c) requires authorities to address under-provision in a 3-5 year period, meaning urban extensions should be reserved only for future needs and growth.

Officer comment:

*Noted. The JCS will consider the inclusion of sites for the traveller community as part of sustainable urban extensions. It is likely that other, smaller scale site provision will be made through other development plan documents to be prepared by the individual authorities.*

- Prevent the purchase of farm land by Gypsies and Travellers for permanent occupation.

Officer comment:

*Comment noted. Planning authorities cannot dictate who purchases land on the open market. They can however ensure that proposals for sites for the traveller community are assessed against relevant planning policy to ensure they are located in the right location, and developed in the right manner, protecting the amenities of neighbouring uses.*

- Ensure sustainable foul drainage infrastructure is provided. Consider Circular 03/99: Planning requirement in respect of the Use of Non-Mains Sewerage incorporating Septic Tanks in New Development.

Officer comment:

*Agreed. JCS consultations are undertaken in accordance with the agreed JCS 'Consultation Strategy' and will include full and proper consultation with gypsy and traveller communities.*

- Ensure consultation with Gypsies and Travellers is direct and accessible in line with paragraph 27-29 of Circular 1/2006. Representative bodies (e.g. Friends and Families of Travellers, and the Traveller Law Reform Project) can give their opinion but such responses are not sufficient to satisfy needed community involvement.

Officer comment:

*Agreed. JCS consultations are undertaken in accordance with the agreed JCS 'Consultation Strategy' and will include full and proper consultation with gypsy and traveller communities.*

- Consider producing a joint dedicated Gypsy and Traveller Development Plan Document (DPD).

Officer comment:

*Comment noted. This is not something that is being considered at this time. It is envisaged the JCS and other development plan documents will be the vehicle for identifying a future supply of sites for gypsy and traveller communities, based on an understanding of local future need.*

- Incorporate Site Grant Guidance (Homes and Communities Agency, Jan 2009).

Officer comment:

*Disagree. It would be inappropriate for the JCS to contain detailed guidance in relation to the Gypsy and Traveller site grant guidance.*

## 14 Employment

Many respondents were more concerned about jobs than housing given the current economic downturn, with several highlighting a historic deficit in provision of employment land across the area (and particularly in Cheltenham). Similarly, many respondents were critical of the emerging RSS claiming it focuses on housing at the expense of employment. Respondents called for the JCS to:

- Develop a skilled local workforce and reduce the need to import skills: focus on education, targeted at the needs of current and future local employers.

Officer response:

*Agree – The JCS provides for inward investment in the area therefore providing confidence for local employers to invest in the skill base of existing and new employees. Beyond the JCS, future*

*work developing development management policies can also look at other means of promoting the local workforce through e.g. local labour agreements and training schemes tied to a planning consent.*

- Provide adequate and appropriate land for employment uses, in balance with housing provision across the area, allowing people to live near where they work (while understanding that this is not always possible and some people will/must commute).

*Officer response:*

*Agree – Employment land at Gloucester, Tewkesbury and Cheltenham is proposed to be included within the strategic development sites.*

- Provide sufficient, suitable and appropriate employment land for modern businesses, to meet a range of employment needs including: rural workshops, starter units, intermediate units, general employment sites suitable for a range of businesses, plus larger sites to attract major inward investment to the area. Recognise that many land uses can deliver economic development and job creation, not just those in the B-classes (business, general industrial and storage/distribution).

*Officer response:*

*Agree – A mixture of types and sizes of units is desirable but also so is a focus on flexibility so that units can be reconfigured or put to alternative employment uses more easily. The evidence in the Employment Land Review confirms that there are a number of sectors beyond the B Class uses which will contribute even more to overall employment levels in future.*

- Provide a dispersed pattern of employment, balanced between urban and rural areas as follows:
  - Meet the needs of major employment key sectors at or adjacent to Gloucester, Cheltenham and Tewkesbury/Northway.
  - Provide more limited allocations for employment uses in rural areas.

*Officer response:*

*Partly Agree – Employment provision across the whole JCS area should be promoted wherever practicable but any dispersal must be sustainable and avoid inappropriate large scale developments that would attract high volumes of commuting in remote rural locations.*

- Adopt a sequential approach to employment development (as recommended for housing, section 14), prioritising accessible, serviced brownfield sites in the main urban areas over greenfield development on the edge of town.

*Officer response:*

*Agree – A sequential approach is sensible and making use of existing brownfield sites is favoured. However, there may be instances where some employment provision is required outside of the existing centres e.g. to support housing development which may be occurring away from a town centre location.*

- Protect environmental and heritage assets (in their own right, but also as the foundation of the tourist industry and associated employment; and as a key reason why the area is a nice place to live/work that may attract people to start a business here).

*Officer response:*

*Agree – The JCS area has a rich heritage which requires protection. However, where employment uses can proceed whilst avoiding an adverse impact or would deliver the necessary funds to conserve a heritage asset then this should be considered favourably.*

- Avoid the significant loss of accessible urban employment land to other uses as part of regeneration projects.

*Officer response:*

*Agree – Retaining viable and sustainable employment land is critical but there may be some instances when in order to deliver successful regeneration on less viable or less sustainable sites, alternative uses may need to be considered to facilitate delivery.*

- Balance manufacturing and service industries, and support agriculture.

*Officer response:*

*Agree – The JCS supports all of these uses along with others. However, the JCS shall not be prescriptive in terms of these being the only acceptable uses and needs to retain sufficient flexibility to respond to growth and decline in different economic sectors.*

- Support rural employment and ensure the viability of farm holdings and woodland enterprises (which underpin the conservation of landscapes and wildlife habitats). Respondents made specific calls for the JCS to:
  - Sustain the land-based sector
  - Enable farm diversification
  - Enable new small-scale business to set up in under-used and redundant farm buildings
  - Encourage home-based working
  - Support and promote rural tourism (but avoid over-reliance on this sector due to work being primarily low-paid and seasonal)
  - Support niche farm products and markets

Officer response:

*Agree – Greater endorsement of existing rural employment and further rural employment opportunities should be provided within the JCS. Some flexibility as to the types of uses which are acceptable in rural areas should be allowed whilst avoiding large-scale and unsustainable rural development.*

- Secure prompt deployment of high-speed broadband and provide for telecommunications (in line with PPG8).

Officer response:

*Agree – The JCS fully supports this objective.*

- Foster local specialisms, e.g.:
  - Gloucester – manufacturing
  - Cheltenham – services, tourism
  - Tewkesbury – light industry, logistics, tourism
  - Outer areas – tourism, home working, farming and diversification, cottage industries

Officer response:

*Disagree – there is a need to be cautious about specialisms as a downturn in a single sector economy can be severe. An element of diversification is required and will be supported by the JCS.*

- Support development of high-tech industry across the JCS area.

Officer response:

*Partly Agree – The JCS shall support the high-tech industry but also continue to support other sectors to ensure there is sufficient diversification of the local economy.*

- Include employment uses and live/work units in any urban extensions.

Officer response:

*Agree – Employment uses can be complementary to housing development in order to provide for some local jobs provision. Live/work units are generally acceptable but must be in balance with the existing or proposed mix of uses to deliver sustainable communities*

- Consider the provision of employment space in light of: increased development densities; reduced on-site car parking provision; open-plan workplaces; and modern working practices such as home-working and hot-desking; all of which may reduce employment land-take.

Officer response:

*Agree – The JCS is informed by an ongoing Employment Land Review in which these types of issues are factored in.*

- Plan for the continued development and use of local military bases in light of the changing role and requirements of the armed forces and their holdings.

Officer response:

*Agree – the JCS maintains dialogue with the local military bases to stay informed of any changes in circumstances.*

- Enforce green transport plans of major employment sites (GCHQ was criticised for failing to follow its own plan).

Officer response:

*Whilst enforcement of travel plans may be beneficial, this is not a matter for the JCS.*

- Competitively price the park and ride schemes (Cheltenham was described as being more expensive than both Bath and Oxford).

Officer response:



*The pricing of Park & Ride facilities is not a matter for the JCS.*

- Protect Staverton Airport as an important provider, accommodator and enabler of employment, a source of foreign exchange earnings, a profitable tax-payer benefiting all three JCS authorities, and a provider of sustainable transport options (given the high fuel efficiency of the smaller modern planes used there).

*Officer response:*

*Noted – There are no current plans for any significant changes to the operation of the airport although the area as a whole is considered within the Broad Locations assessment work. It is recognised that there are important local employers here.*

- Follow the guidance of Gloucestershire First's Integrated Economic Strategy, and the three councils' Employment Land Reviews.

*Officer response:*

*Agree – It is important that decisions are based on sound evidence contained within the evidence base documents such as those mentioned here and also through public engagement. This will continue to be the case.*

## 15 Urban and rural issues

Respondents wanted a balanced approach to rural and urban issues. Given that the majority of respondents (and national/regional planning policy) suggested that urban areas should be the focus of growth, specifically *urban* issues are dealt with first, and *rural* issues second. Respondents called for the JCS to:

### **All city and town centres:**

- Secure the regeneration of Cheltenham, Gloucester and Tewkesbury centres, building on their existing strengths and facilities, with each place fulfilling complementary roles, and without compromising their distinct characters

*Officer comment:*

*Agree – The JCS as a strategic development plan seeks to ensure that the area is attractive for inward investment to ensure that existing, new and emerging economic sectors can continue to grow and flourish across the area.*

- Regenerate rather than expand town centres – several respondents called for shrinkage of centres to create and concentrate vibrancy/activity, particularly in light of the current and anticipated future impact of online retailing. A minority wished to see the centres expand.

*Officer comment:*

*Agree – Both Gloucester and Cheltenham councils are focussing on regeneration of their central brownfield sites in order to ensure the vitality and vibrancy of the town and city centres.*

- Re-use existing buildings where possible (new is not always best or most sustainable).

*Officer comment:*

*Noted – Where existing buildings make significant contributions to their locations local planning authorities may seek to retain them. This will be achieved through policies in Local Development Documents not through policies in the JCS.*

- Provide a better mix/range of quality chain stores and independent shops/markets to enhance local distinctiveness and to create an 'experience' for users (Cirencester was cited as a good example). This to be supported by attractions other than retail (e.g. festivals, culture) and good quality public spaces.

*Officer Comment:*

*Noted – Improving the retail offer, regeneration and marketing of central areas in Gloucester, Tewkesbury & Cheltenham remains the responsibility of each authority who may pursue the matter through additional Local Development Documents.*

- Promote a range of uses in town centres which result in a balanced and safe evening/night time economy – control the quantity, type and location of evening or late night uses.

*Officer Comment:*

*Noted – Improving the evening & night time economy in the central areas of Gloucester, Tewkesbury & Cheltenham remains the responsibility of each authority who may pursue the matter through additional Local Development Documents.*

- Halt out-of-centre retail development, including better control of supermarket development that draws trade from town centres. Some professional respondents accepted further out-of-town development providing the requirements of PPS4, Planning for sustainable economic development, are met.

*Officer comment:*

*Noted – Applications for further retail development at out of centre locations will be robustly assessed in accordance in accordance with national planning policy guidance/framework taking into consideration the requirements of the sequential and impact tests.*

- Make better use of vacant shop units and empty properties above shops (e.g. for affordable housing).

*Officer comment:*

*Noted – Existing urban capacity within centres has been taken into consideration in determining locally derived housing figures.*

- Provide support for more people living in town/city centres to create busy street-life around the clock, to foster a sense of community, and to improve safety after dark.

*Officer Comment:*

*Noted – Improving the evening & night time economy in the central areas of Gloucester, Tewkesbury & Cheltenham remains the responsibility of each authority who may pursue the matter through additional Local Development Documents.*

- Maintain provision of public conveniences.

*Officer Comment:*

*Noted – Improving regeneration and public facilities of central areas in Gloucester, Tewkesbury & Cheltenham remains the responsibility of each authority who may pursue the matter through additional Local Development Documents.*

- Restrict street clutter and promote high-quality public spaces, signage and street furniture.

*Officer Comment:*

*Noted - This matter will be addressed through detailed design policies in each authority's Local Development Documents.*

- Provide for transport improvements as follows:

- Improve links between Gloucester, Cheltenham and Tewkesbury
- Improve traffic management, and locate new development to minimise congestion (significant concerns were expressed over the impact of major development to the south of Cheltenham)
- Reduce the dominance of vehicles in town centres – promote pedestrian/cycle access and movement
- Support well-placed and competitively-priced park and ride schemes
- Maintain separate train stations for Cheltenham and Gloucester (do not merge in favour of an out-of-town 'parkway' station) and improve services to London (to reduce numbers driving to Swindon to catch fast services)
- Provide for a new mainline rail station at Gloucester
- Support the re-dualling of railway between Swindon and Kemble
- Support the opening of the Honeybourne Line to Stratford on Avon, with a cord to the Oxford and Paddington Line
- Improve bus services at Ashchurch Station (Tewkesbury Parkway)
- Provide for completion of the A417/419 missing link
- Provide for further development of Staverton Airport
- Improve canal and river infrastructure
- Provide free/more affordable car parking to better compete with other centres
- Consider using the A417 to bypass Cheltenham both to the east (with A435) and to the southwest.

*Officer Comment:*

*Noted - Local Transport Plan 3 (LTP3), prepared by the County Council, is the main policy document for improvements to transport in the JCS area, however the JCS will be the delivery tool for many proposals within LTP3.*

Developers called for the JCS to:

- Identify the principal areas to which regeneration policies apply and allocate key sites (thus allowing thorough testing of site deliverability against PPS3, and opening dialogue with landowners such that allocated sites are robust and deliverable in agreed timescales). There was disagreement over the use of the JCS or a Site Allocations DPD for this purpose.

*Officer comment:*

*Noted - It is intended that the JCS will identify with a 'sharp focus' suitable, achievable & deliverable sites outside urban areas for development for the next 10 years, a 'softer focus' will be applied to sites for the last 10 years of the plan period. The SHLAA which comprises part of the evidence base for the JCS is subject to input from the development industry, moreover comment was invited from the development industry with regard to consideration of 'broad locations' when ascertaining areas of search for new strategic sites.*

- Avoid imposing a phasing policy for the delivery of urban brownfield land prior to the urban extensions. Such a policy was seen as ignorant of technical and financial viability constraints, and of failing to address family housing needs given the preference for apartment development on urban regeneration sites. See also section 18, Deliverability and phasing.

*Officer comment:*

*It is appreciated that both brown and green field sites need to be provided in order to secure a mixed supply of type and tenure of housing. The JCS will not be identifying brown field sites within urban areas as these comprise part of the existing housing supply in the JCS area, it is intended however that over the first 10 year period such urban capacity sites will be built out alongside strategic green field sites identified by the JCS.*

### **Gloucester:**

- Priority should be given to the regeneration of the Kings Quarter, Blackfriars and Greyfriars in line with Gloucester Heritage Urban Regeneration Company (GHURC) proposals.

*Officer response:*

*Noted - Regeneration of key central sites remains a top priority for Gloucester City Council and will continue to be pursued through the emerging Gloucester City Plan and by partnership working with preferred developers.*

- Set out GHURC's programme area, key projects, and programmed outputs for each site.

*Officer response:*

*Disagree - It is not the role of the JCS to programme regeneration within Gloucester City, this will be pursued through the Gloucester City Plan Development Plan Document.*

- Expand the city centre to take in the Western Waterfront areas to the west and north-west.

*Officer response:*

*Noted – The future development of Gloucester will be pursued through the emerging Gloucester City Plan not through the JCS.*

- Improve linkages between the city centre, the regeneration areas around the waterfront, and the existing retail facilities at St Oswald's Park.

*Officer response:*

*Noted – These matters will be addressed through the emerging Gloucester City Plan not through the JCS.*

- Include Eastern Avenue in proposed regeneration sites.

*Officer response:*

*Noted – This matter will be addressed through the emerging Gloucester City Plan not through the JCS*

### **Cheltenham:**

- Focus development on the lower High Street and better link the Brewery development to the town centre.

*Agreed – regeneration of this part of town to be considered through review of Cheltenham Borough Local Plan not directly through the JCS. This is being pursued through Cheltenham Development Taskforce.*

- Remove the bus stops from the Promenade, to improve the pedestrian environment.  
*Agreed – this is being pursued through Cheltenham Development Taskforce independently by Cheltenham Borough Council not the JCS.*
- Support specialist shopping areas (e.g. Montpellier and the Suffolks) through provision of nearby street parking.  
*Agreed – to be considered through review of Cheltenham Borough Local Plan not directly through the JCS. Character Area Appraisal and Management Plans have been produced for a number of areas within the Central Conservation Area. Areas include Montpellier and the Suffolks.*
- Make better use of the Honeybourne Line as a sustainable transport route, facilitating non-motorised movement across Cheltenham from the racecourse to the train station.  
*Agreed – The Honeybourne Line will continue to be protected from development as they can in appropriate circumstances be used as sustainable transport corridors where walking and cycling routes can be installed. To be considered through review of Cheltenham Borough Local Plan not directly through the JCS.*
- Ensure new building delivered through the Civic Pride Initiative is of the highest standards of design and sustainability.  
*Agreed – this is being pursued through Cheltenham Development Taskforce independently by Cheltenham Borough Council not the JCS*
- Regenerate Coronation Square.  
*Agreed - this is being pursued through Cheltenham Development Taskforce independently by Cheltenham Borough Council not the JCS. The site is included within the Strategic Housing Land Availability Assessment.*

#### **Tewkesbury Town:**

- Create a Tewkesbury Town Centre Masterplan / Development Framework (as currently proposed).  
*Officer response:  
Agree – this is being produced by Tewkesbury Borough Council, not through the JCS.*
- Improve the relationship between the town and its waterways to enhance the leisure and tourism offer.  
*Officer response:  
Noted – This is a matter being pursued through the Tewkesbury Town Centre Masterplan.*
- Enhance the local, friendly, independent feel but improve facilities to enhance and retain retail spending and to improve visitor numbers/duration of stay.  
*Officer response:  
Noted – This is a matter being pursued through the Tewkesbury Town Centre Masterplan.*
- Improve and diversify employment opportunities.  
*Officer response:  
Noted – This is a matter being pursued through the Tewkesbury Town Centre Masterplan and the Economic Development Strategy*
- Consider a bypass to reduce air pollution/traffic problems.  
*Officer response:  
Noted – Any such scheme would need to be carefully considered in terms of other impacts and funding availability.*
- Address the role and scale of commercial development at M5 junction 9.  
*Officer response:  
Noted – This will be considered in the next stages of the Core Strategy.*
- Acknowledge the high degree of interaction between communities in Tewkesbury/Northway and those in Worcestershire for work and leisure. This applies particularly to public transport issues, including rail fares and the absence of cross-border bus services.  
*Officer response:  
Noted – this will be considered as part of work allied to the Joint Core Strategy in preparing an Infrastructure Delivery Plan*

### **Rural areas / the wider Tewkesbury Borough:**

Issues affecting rural areas and smaller towns/villages are covered throughout this report, but key issues relating to service provision and rural/urban relationships are highlighted here.

Respondents called for the JCS to:

- Avoid focusing on towns/cities at the expense of rural communities.

Officer comment:

*Agree – There will be a need for rural areas across the JCS to accommodate some growth as part of the emerging JCS strategy.*

- Protect the AONB, Green Belt and productive agricultural land – as detailed in section 13, Sustainability.

Officer comment:

*Agree - The JCS seeks to protect the AONB and further landscape designations wherever possible. A Green Belt Review has been produced as part of the JCS evidence base to consider the function of the whole of the green belt between Cheltenham and Gloucester, Cheltenham and Bishop's Cleeve.*

- Provide affordable housing – as detailed in section 14, Housing.

Officer comment:

*Agree – A mixture of market housing and affordable housing will be provided across the JCS area. A Strategic Housing Market Assessment has been produced by Gloucestershire County Council working with the six authorities which comprise Gloucestershire. The report forms part of the JCS evidence base and can be used to assess housing need and demand in order to develop policies.*

- Support the rural economy – as detailed in section 15, Employment.

Officer comment:

*Agree – It is recognised that due to the rural nature in parts of the JCS area that specific attention needs to be given to the rural economy. The JCS as a strategic development plan seeks to ensure that the area is attractive for inward investment to ensure that existing, new and emerging economic sectors can continue to grow and flourish across the area. An Employment Land Review has been produced as part of the JCS evidence base to address the need for and type of employment land across the area.*

- Provide new housing only in proportion to the existing settlement, and with reference to social infrastructure provision and the transport network – as detailed in section 14, Housing.

Officer comment:

*Noted – The unique character of the JCS area has been taken into consideration when identifying strategic new development areas. Local household projections have been produced in order to determine the amount and type of housing to come forward over the plan period. It is proposed that a Community Infrastructure Levy/Infrastructure Development Plan will be prepared alongside the JCS Preferred Option.*

- Ensure adequate provision of social infrastructure and convenience facilities in rural areas to reduce the need to travel – both for the existing population (in the absence of growth) and in response to any proposed development – as detailed in section 14, Housing and section 17, Sustainable urban extensions.

Officer comment:

*Agree - The unique character of the JCS area has been taken into consideration when identifying strategic new development areas. The JCS will work towards producing sustainable development and creating new sustainable communities. It is proposed that a Community Infrastructure Levy/Infrastructure Development Plan will be prepared alongside the JCS Preferred Option.*

- Provide better access by public transport to urban centres from rural areas.

Officer comment:

*Agree - The JCS will work towards producing sustainable development and creating new sustainable communities.*

- Ensure the concentration of new development around urban areas does not suck in capital expenditure on infrastructure to the detriment of investment required to existing infrastructure in the rural hinterland.

Officer comment:

*Agree - The JCS will work towards producing sustainable development and creating new sustainable communities. A Sustainability Appraisal of the JCS will be undertaken in order to ensure that urban sprawl is limited and ensure the containment of settlements.*

It is important to note that, while many respondents called for the JCS to provide for 'appropriate development' in rural settlements, many respondents also sought to remove specific settlements from consideration for further development – usually on the grounds of: existing over-development; inadequate social infrastructure; flood risk; conservation; poor transport connections; and/or sustainability issues.

## **16 Sustainable urban extensions**

As indicated in section 14, above, respondents were well-informed on housing issues arising from the emerging RSS and in particular on the sustainable urban extensions (SUEs) to Gloucester and Cheltenham proposed in the RSS.

Respondents expressed significant concern over the evidence for and scale of RSS housing targets, and the need for urban extensions. Doubt was cast on the housing growth targets in light of the economic downturn, and support was expressed for environmental conservation in its own right, as well as in response to climate change, flood risk, biodiversity, pollution, food security, character and heritage for example. Several respondents highlighted the lack of adequate Sustainability Assessment on three of the five Areas of Search for SUEs and the resulting likelihood of legal challenge such that these areas should not be considered for development until the issue is resolved.

Respondents called for the JCS to:

- Protect the AONB, the Green Belt, and productive agricultural land.

*Officer response:*

*Noted – Sustainability appraisal, which takes into consideration all landscape and environmental constraints and designations has been undertaken on all the broad locations considered by the JCS in order that members can come to informed choices with regard to the preferred strategic sites for new development over the first 10 year plan period.*

- Prevent urban sprawl and the coalescence of settlements.

*Officer response:*

*Agree – The challenge for the JCS is to accommodate new growth around the existing urban centres across the three authorities without causing either urban sprawl or coalescence of settlements. A Green Belt Review has been undertaken in order to provide part of the evidence base for the JCS. A further Green Belt Review will be undertaken.*

- Protect the unique character of the area and its settlements.

*Officer response:*

*Agree – Part of the attractiveness of the JCS area is its unique landscape setting from Cotswold escarpment in the east to Severn Plain in the west. It is the role of the JCS to identify areas that can accommodate growth without having an adverse impact on the unique character of the area or its settlements.*

- Avoid overwhelming existing transport and social infrastructure with further population growth.

*Officer response:*

*Noted – It will be necessary for any new growth areas to benefit from the relevant physical and social infrastructure. It is intended that an Infrastructure Delivery Plan will sit alongside the adopted JCS.*

- Re-use brownfield sites and empty buildings (which benefit from existing infrastructure, services, facilities and access) before greenfield sites.

*Officer response:*

*Noted – In order to provide a mixed supply of size and tenure of dwelling units it will be necessary to allow green field releases alongside the continued regeneration of brown field sites in the urban areas.*

- There were some calls for construction of one new town (or major SUE) in preference to multiple SUEs (only if the housing need is proven), and for development of Staverton Airport for housing (the green belt here being viewed as already 'degraded' and connections being good, thus making its development preferable to that of 'untouched' green belt elsewhere).

*Officer response:*

*Disagree: It is necessary to plan for the indigenous growth of Gloucester, Tewkesbury and Cheltenham by providing sustainable extensions to each centre as well as providing for growth in the rural areas. One large new settlement would not be sustainable as it would result in increased commuting to existing areas of local employment. The area to the north of Gloucester City is being considered for public consultation as a Broad Location option.*

Respondents were asked to consider what should happen if SUE(s) are proven to be necessary. They called for the JCS to:

- Ensure any SUE provides adequate social, physical and transport infrastructure to support itself, as well as addressing existing local deficiencies (see also section 18, Deliverability and phasing, below).

*Officer response - Please see responses to Deliverability and Phasing*

- Ensure the necessary infrastructure is in place prior to construction/occupation of housing (see also section 18, Deliverability and phasing, below).

*Officer response - Please see responses to Deliverability and Phasing*

- Ensure new development is mixed tenure and with a real sense of community, high design/space standards and adequate open space for both people and wildlife.

*Officer response:*

*Noted – In order to be sustainable new strategic developments need to provide a mix of type and tenure of dwellings and need to integrate well with existing communities whilst providing opportunity for community development within the new area. It will be the responsibility of each authority to implement best practice design and space standards within strategic developments in accordance with adopted local development plan policies.*

- Ensure SUEs are designed to reduce waste, and equipped to process their own waste.

*Officer response:*

*Noted – The strategic management of waste in the JCS area is led by the County Council via the Minerals and Waste Core Strategy. Developers will need to accord with this Development Plan Document with details of waste management regimes being considered at the master planning stage of each strategic development.*

- Provide a full-access Junction 10 if major development goes ahead in northwest Cheltenham.

*Officer response - Please see responses to Deliverability and Phasing*

The development industry considered that the proposed SUEs have a vital role to play within the JCS area in providing new homes (open market and affordable), social infrastructure and employment opportunities for the well-being of existing and future populations. These respondents drew attention to the requirements of the emerging RSS and the provisions of PPS12 whereby the JCS must conform generally to the RSS.

## 17 Deliverability and phasing

Developers accepted the need to contribute towards social infrastructure, providing the requirement does not impact so significantly on viability that it precludes the development from coming forward in the first place. Respondents expressed mixed views on the Community Infrastructure Levy (CIL), as follows:

- Impose a standard CIL to provide clarity for developers and local authorities.
- Impose a CIL on development above agreed size thresholds, and incorporate site-by-site flexibility having regard to development viability (e.g. lower tariffs for urban regeneration sites).

- Avoid the Community Infrastructure Levy, instead seeking developer contributions to infrastructure provision on a site-by-site basis, subject to viability and in accordance with national policy.

Officer response:

Whilst comments one and three appear to be contradictory, it should be noted that from April 2014 a local authority will not be able to pool contributions from more than five developments towards provision of infrastructure not being funded by CIL. Therefore securing contributions towards funding provision of, for example, strategic road improvements to cater for increased cumulative traffic generated from development of several sites would not be possible without CIL. However, s.106 may still have an important role to play in relation to the mitigation of certain site-specific impacts and it will remain central in respect of affordable housing (which is exempt from CIL). CIL and s.106 should not, therefore, be viewed as “either/or” in a general sense.

Size thresholds are statutorily incorporated within CIL. The charge cannot apply to development smaller than 100m<sup>2</sup> gross internal floor area. There are also other forms of statutory “relief” such as apply to charities and social housing.

Whilst within an overall context of economic viability CIL needs to be reasonably flexible and responsive to change, flexibility on a site-by-site basis may defeat a fundamental objective of CIL – to provide greater certainty to the public and developers as to the level of contributions a development will be required to make towards the provision of infrastructure in the area.

Local residents and pressure groups expressed a hard line, calling for the JCS to:

- Impose a levy to direct development to brownfield sites and away from greenfield sites (i.e. impose substantially higher levies on greenfield than brownfield sites).

Officer response:

*The phasing of development having regard to the primacy of brownfield or greenfield sites is properly a matter for the strategic policies of the plan. It is not for CIL to introduce different contribution rates by reason solely of such classification since the infrastructure demands of development of a site – whether it is brownfield or greenfield - will not necessarily bear any relation to its status in this respect. Variations in levy charges in different areas or relating to different types of development should be governed primarily by considerations of economic viability.*

- Permit reduced charges only in relation to green/biodiversity and community projects.

Officer response:

*Noted, but it is essential that the CIL is based upon sound evidence and reasoning. There currently is no obvious objective justification or JCS policy support for differentiation along these lines.*

- Secure climate change amelioration measures and renewable energy initiatives as part of planning conditions.

Officer response:

*Noted - this is a planning policy issue rather than a matter directly for CIL.*

- Ensure all development and infrastructure costs are met by developers, with no cost burden being placed on the three local authorities and ultimately the residents of those areas.

Officer response:

*Developers will be expected to make contributions towards the provision of infrastructure both on and off-site as required, and towards mitigation of other impacts of development. But additional sources of funding are likely to be needed to ensure that adequate infrastructure comes forward. This funding will come from a variety of sources including government. It might also be borne in mind that local authorities will receive council tax revenue from new development.*

- Ensure new social infrastructure is in place prior to the occupation of new development.

Officer response:

*Noted - although the same rationale could apply to physical and green infrastructure.*

Phasing was a controversial area. Many respondents expressed a preference for “brownfield first”, and there were calls for the JCS to identify key areas of Gloucester City and Cheltenham as



regeneration areas and to include a suite of policies specific to them to bring forward development schemes.

Meanwhile the development industry called for a flexible approach, and predicted negative impacts of phasing for housing choice and deliverability, as follows:

One respondent quoted the Panel Report for the RSS, which is of relevance to both sides of the debate. It addressed the public's preference for greenfield sites to be reserved "until brownfield sites are exhausted" in the following terms:

## 18 Flooding

In light of the extreme flood event experienced locally in summer 2007, respondents viewed flood prevention and mitigation as the most important planning issue in the JCS area, and there was a high level of awareness of the challenges involved. While there was consensus on the importance of this issue, there was disagreement over the adequacy of current policies to address it.

Many respondents questioned the effectiveness of existing national policy and called for a "belt and braces approach" in which the JCS would impose flood policies *beyond* those of central government. However, the development industry viewed the current policy and technical assessment framework as adequate, highlighting PPS25's demand that flood risk is considered at all stages of planning, taking into account climate change and sustainable drainage strategies.

Bearing in mind this disagreement, respondents called on the JCS to:

- Support and introduce the Pitt Report recommendations and make reference to the Water Framework Directive (on water quality).

Officer response:

*Noted: The Pitt Report contains 92 detailed recommendations. The JCS authorities are working with the County EA and other parties to ensure they are implemented. Where appropriate to a spatial document they will be incorporated, as will requirements of the Water Framework Directive.*

- Re-define the flood zones to incorporate local knowledge – and a margin to account for climate change.

Officer response:

*Noted – Strategic Flood Risk Assessment Level 2 (SFRA 2) is a detailed piece of work that not only takes account of modelling but empirical evidence i.e. local knowledge of previous floods. All floods will be different however, and small scale/surface water flooding is particularly difficult to predict and will change over time. Further work may be needed on extending SFRA coverage depending on broad locations work. Also as new modelling techniques come on stream then flood maps will need to be updated. Any policy will contain a margin for Climate Change.*

- Account for both fluvial and pluvial flooding in flood risk assessment and flood defences (noting that, according to the Pitt Report, one third of the 57,000 homes flooded in 2007 were flooded by surface water, and therefore not necessarily in the floodplain). The Surface Water Management Plan (SWMP) for Gloucester City should therefore be extended to cover the rest of the JCS area for inclusion (alongside Hazard Mapping) in Level 2 Strategic Flood Risk Assessment (SFRA).

Officer response:

*Noted - Surface water is notoriously difficult to predict. We must ensure that we are proportionate in terms of the work undertaken. However, Surface Water Management Plans (SWMPs) are now being prepared for Cheltenham, the Tewkesbury, Northway and Ashchurch area, the Bishops Cleeve, Woodmancote and Southam area in addition to the Gloucester SWMP*

- Ensure there is no building on the floodplain, and consider a 10-metre easement along flood zones. Some respondents went further, proposing a "managed retreat from the floodplain", i.e. removing existing structures in, or alterations to, the functional flood plain.

Officer response:

*Accepted in part – Flood plains are zoned to take account of probability. Certain uses can be built in high probability flood zones. Vulnerable uses however, should not be allowed in high probability flood zones. Managed retreat has been supported by JCS authorities in the past especially on those sites identified in the Shoreline Management Plan for the Severn Estuary. Significant structures have already been removed from the functional floodplain as part of development*

*proposals in Gloucester and work will continue in this vein. A 10 metre easement while workable on gently shelving flood plains becomes meaningless when topography is more severe. A more sophisticated method of reducing risk could be looked into however,*

- Ensure new development does not increase (and should be designed to reduce) flood risk to existing properties.

*Officer response:*

*Noted - Development should not increase flood risk to other properties. There will be occasions where betterment can be negotiated; however, any policy pursuing this will need to be appropriate.*

- Ensure water and sewerage infrastructure is in place ahead of any development. Developers must demonstrate adequate on- and off-site water and sewerage capacity to serve their site without affecting existing residents. Where capacity problems are identified, planning permission should only be granted if the developer funds the appropriate improvements for completion prior to occupation of the development. See also section 18, Deliverability and phasing.

*Officer response:*

*Accepted*

- Permit the development/expansion of water and sewerage infrastructure where it is needed to serve existing or proposed development, or in the interests of long term water supply and waste water management (provided that the need outweighs any adverse land use or environmental impact, and that any such adverse impact is minimised).

*Officer response:*

*Accepted*

- Restrict ground-raising unless it forms part of an approved flood alleviation scheme, or as part of a new development which requires ground-raising to achieve flood resistance measures. In this instance a Flood Risk Assessment must prove that there will be no increase in flood risk elsewhere, and demonstrate how this will be achieved.

*Officer response:*

*Accepted (in areas identified as being prone to flood)*

- Demand practical flood prevention measures in new development including:
  - Sustainable Urban Drainage Systems (SUDS). It is important to note that there was considerable disagreement over the effectiveness of SUDS. Supporters claimed they are essential and effective in controlling water flow and improving water quality, providing the correct mix of techniques are employed according to local conditions. Opponents claimed local soil types render SUDS ineffective, and suggested SUDS should only be used if proven successful via on-site testing.
  - Planting, woodland creation and woodland management schemes to control water flow (while simultaneously creating attractive environments, amenity benefits, and aiding biodiversity).
  - Grey water recycling.
  - Mandatory flood resistance and resilience measures in all ground floor extensions and new buildings located in residual risk areas.
  - Restricted permission for conversion of cellars to habitable basements in line with flood risk.
  - Permeable hard surfaces.
  - Upgrading dated, low-capacity or combined sewers.

*Officer response:*

*Accepted in part – SUDS are an effective way of restricting surface water discharge in a manner that does not rely on traditional piped underground systems that can fail and may not deliver capacity requirements. There are also biodiversity and amenity benefits. Different solutions are required for differing lithologies and soil types. The JCS will actively pursue SUDS.*

*Woodland creation will be supported for a number of reasons including water resource management – Unfortunately with current knowledge we can not rely on it to deliver a measured reduction in flood flow.*

*Grey water recycling will be supported for wider sustainability reasons in particular water resource management.*

*Flood resilience measures will be pursued in areas of flood risk*

*As pointed out by other respondents surface water is the reason for many flood incidences and this will only be exacerbated by an increase in hard surfacing. We will as a matter of course*

*pursue development that utilizes permeable surfacing as well as green roofs and other means to ensure water is treated in a sustainable manner  
We will seek advice from Severn Trent and where appropriate negotiate on their behalf on issues of combined and under capacity sewers.*

- Incorporate River Severn Catchment Flood Management Plan policies.

*Officer response:*

*Accepted where relevant to a spatial planning document. Note: Much of Gloucester is covered by the Severn Tidal Tributaries CFMP*

- Consider producing a Water Management Supplementary Planning Document (SPD). Several respondents called for Tewkesbury Borough Council to adopt the draft Flood and Water Management SPD prepared by the Severn and Avon Flood Group. This is noted here while drawing attention to the legal requirement of PPS12 that communities must work with the Local Planning Authority (LPA) and should not expect to prepare plans independently and have them adopted as SPD.

*Officer response:*

*Accepted in part – some SPD that covers water management may well be appropriate*

- Consider producing a full Water Cycle Study as part of the evidence base.

*Officer response:*

*Accepted in part – A full blown water cycle study would be cost prohibitive. However, there is a great deal of material currently available which is being brought together for the purpose of the JCS including the SFRA Level 1 and 2 along with the aforementioned SWMPs.*

- Consider including dedicated policies covering water quality and land contamination.

*Officer response:*

*Noted*

Many respondents expressed concern over the possible development of specific sites, detailing their experiences of flooding on the sites and highlighting the anticipated impact of development on neighbouring properties. Areas flagged for concern include all the RSS Areas of Search for urban extensions and more besides: Leckhampton, Shurdington, Warden Hill, northwest Cheltenham, north of Brockworth, north of Gloucester / the A38 corridor, south of Gloucester, Minsterworth and Elmstone Hardwicke.

*Officer response:*

*Noted - All previous RSS sites have been subject to a Strategic Flood Risk Assessment Level 2. This is a detailed piece of work that uses the most up to date modelling available and empirical evidence. No site should come forward that is at risk of flood unless it can be demonstrated that it passes the sequential test (and exception test if appropriate). It must also be demonstrated through a detailed site specific Flood Risk Assessment that it does not increase the risk of flood elsewhere and that flood resistance and resilience measures can sufficiently mitigate the risk.*

Many respondents also expressed concern over maintenance of flood defences, dredging etc, highlighting the importance of: regular maintenance by riparian land-owners and/or the Local Authority; setting clear roles and responsibilities for those involved; and robust enforcement. This is an operational issue, outside of the JCS remit, but is noted here for completeness.

*Officer response:*

*Noted - but not an issue for a spatial plan other than to avoid problems of silting and blocked culverts in new development. As such a SUDS policy will be pursued*

## 19 Green infrastructure

Protection of green spaces was a high priority for the majority of respondents. The Green Infrastructure approach to the management of open spaces was endorsed by many: connecting and managing all green spaces for free access and multi-functional use by all. Respondents called for the JCS to:

- Protect and promote the positive management of: the AONB (with reference to the Cotswolds AONB Management Plan), Green Belt, woodlands, productive agricultural land, playing fields, allotments, disused railways, parks and open spaces.

*Officer response:*

*Agree – The JCS seeks to protect the AONB and all existing POS across the three authorities. A green belt study has been produced as part of the JCS evidence base to consider the function of the whole of the green belt between Cheltenham and Gloucester.*

- Promote and secure improved access to all of these spaces (acknowledging the pressures imposed by public access, and accepting that some areas may need protection/limited access, for example dog-walking restrictions in areas with ground nesting birds).

*Officer response:*

*Agree –With caution the green infrastructure strategy will attempt to connect people with green space. Improved access will be a component but it has to be recognized that the vast majority of land is in private ownership and managed for a purpose with often limited access.....*

- “Green” the existing urban fabric where possible.

*Officer response:*

*Agree - GI strategy will aim to preserve and enhance green spaces within urban areas*

- Support the establishment of a new regional park.

*Officer response:*

*Support welcomed*

- Provide new and complementary, linked habitats and green spaces in the Severn Vale.

*Officer response:*

*Agree - Part of the raison d’etre of the Regional Park will be to support the creation of linked complimentary habitats and green spaces in the central vale*

- Provide a mix of formal and informal open spaces.

*Officer response:*

*Agree – a mix will be encouraged*

- Support the provision and expansion of allotments, community orchards and community composting (linked to local food schemes, see also section 13, Sustainability).

*Officer response:*

*Agree with caution – Allotments, Community orchards and related land uses will be supported. While composting schemes and linkages to local food networks is to be supported it may not be best pursued through the JCS*

- Promote biodiversity and habitats (through a dedicated set of policies, not as an add-on).

*Officer response:*

*Agree- The protection and promotion of habitats and linkages between them will be a component of any policy stance on biodiversity*

- Set a high standard for open space design and landscape treatment and provision of wildlife habitats in new developments. Ensure that ‘green spaces’ provided by developers are adequate and usable (not token gestures on undevelopable land) and contribute to a green network.

*Officer response:*

*Agree with caution - high standards will be set and the norm will be to ensure green spaces are adequate and useable and preferably bio diverse. However, there will be exceptions and the Government is experimenting with biodiversity off-setting, while no decision has been made on this, it may be something the JCS authorities in the JCS may wish to pursue.*

- Address the business opportunities associated with Green Infrastructure and links with an emerging greener economy.

*Officer response:*

*Agree – Investment gravitates to quality environments and it will be incumbent on the JCS generally to ensure that the quality environment currently experienced is preserved and enhanced. With regard to strategic green infrastructure the economic benefits from ‘wildlife tourism’ and related activity are well know and will be promoted.*

- Retain access to the countryside for existing communities on the urban-fringe.

*Officer response:*

- Maintain footpaths/rights of way and provide better cycle tracks (separate from the highway) to link villages/green spaces.

Officer response:

*Agree – GI strategy will support informal and formal rights of way as a means of accessing the wider countryside. We will work with developers and organizations such as Sustrans to ensure cyclists are better catered for*

- Support farmers as “the guardians of the countryside”.  
*Agree with caution – While we would support farmers as guardians of the countryside, in the past 50 years agricultural intensification has resulted in loss of landscapes and biodiversity. Farmers need the right framework to allow them to farm the land profitably but in a manner that does not degrade environmental capital. The JCS will support farmers where it can achieve this objective*
- Support the provision of green burial sites.

Officer response:

*Agree in principle. - This is something not previously considered but given the general positive benefits then it is something to be encouraged.*

## 20 Site-specific recommendations

**PLEASE NOTE:** The following site-specific recommendations are presented for information, in no particular order, summarised from information supplied by respondents, and without prejudice to policies in the JCS or to any future planning applications:

### **Cheltenham urban area**

- Lower High Street – in need of regeneration  
*Cheltenham Development Taskforce is looking at ways of improving linkages in a number of areas in the town centre. One of the ideas is linking the High Street to the Brewery making it easier to walk between the two. This will be a starting point for raising the long term economic performance of this area. The Supplementary Planning Document “Lower High Street Character Area Appraisal and Management Plan” was produced for the area.*
- Car parks north of the town centre – suitable for high density housing, multi-storey parking, and office use, no retail  
*North Place and Portland Street car parks are allocated sites for mixed use development in the Cheltenham Borough Local Plan. This forms part of a comprehensive redevelopment under the Cheltenham Development Taskforce project. Existing Civic Pride Urban Design Framework (December 2010) SPD and North Place and Portland Street Development Brief cover the site. The site is included within the Strategic Housing Land Availability Assessment.*
- Land at the Hayloft, Cheltenham – suitable for housing development if exceptional circumstances for Green Belt development can be proven  
*The site is included within the Strategic Housing Land Availability Assessment.*
- Land at Badgeworth Road, Cheltenham – suitable for mixed-use development if exceptional circumstances for Green Belt development can be proven  
*The site is included within the Strategic Housing Land Availability Assessment.*
- Land at Swindon Lane, Cheltenham – part of Hunting Butts Farm application. Suitable for housing development if exceptional circumstances for Green Belt development can be proven.  
*The site is included within the Strategic Housing Land Availability Assessment.*
- Hunting Butts Farm, Cheltenham – suitable for housing development  
*The site is included within the Strategic Housing Land Availability Assessment.*
- Blakeway/Berry land, Cheltenham – suitable for housing development  
*Noted*
- Briarfields – suitable for housing/mixed-use development  
*The site is included within the Strategic Housing Land Availability Assessment.*
- Cheltenham bus station – suitable for regeneration as mixed-use / entertainment area

*The site forms part of a comprehensive redevelopment under the Cheltenham Development Taskforce project. A Development Brief was produced for the site. The site is included within the Strategic Housing Land Availability Assessment.*

- Land at Badgeworth Road, Cheltenham – suitable for employment uses  
*The site is included within the Strategic Housing Land Availability Assessment.*
- Land at Prestbury – suitable for housing development  
*The site is included within the Strategic Housing Land Availability Assessment.*
- Northwest Cheltenham – suitable for mixed-use, residential and employment development  
*The site is included within the Strategic Housing Land Availability Assessment.*
- Land at Hyde Farm, Cheltenham – suitable for housing development  
*The site is included within the Strategic Housing Land Availability Assessment.*

### **Gloucester urban area**

- All GHURC sites – suitable for mixed-use development  
*Officer response:*  
*Noted - Regeneration of key central sites remains a top priority for Gloucester City Council and will continue to be pursued through the emerging Gloucester City Plan and by partnership working with preferred developers.*
- Kings Quarter – suitable for mixed-use development  
*Officer response:*  
*Noted - Regeneration of key central sites remains a top priority for Gloucester City Council and will continue to be pursued through the emerging Gloucester City Plan and by partnership working with preferred developers.*
- Land at Naas Lane – suitable for employment development  
*Officer response:*  
*Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.*
- The Knoll, Stroud Road – suitable for housing development  
*Officer response:*  
*Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan*
- Helipebs (Holdings) Ltd land at Sisson Road – suitable for housing development  
*Officer response:*  
*Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.*
- Corncroft Lane, Matson – suitable for housing development  
*Officer response:*  
*Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.*
- Sylvanus Lyson's Charity land at Hempsted – suitable for housing development  
*Officer response:*  
*Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.*
- Hempsted Lane – suitable for housing development  
*Officer response:*  
*Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.*
- Gloucester Railway Triangle – suitable for a new prison  
*Officer response:*  
*Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan. The northern railway triangle is currently the subject of a mixed use planning application. At the time of writing this response the application has*

*not been determined. The site lies within a larger area the subject of an adopted Development Brief.*

- Gloucester Railway Triangle and Great Western Road Yard – suitable for housing development

*Officer response:*

*Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan. These sites lie within a larger area the subject of an adopted Development Brief.*

- Site SUB17 – suitable for housing development

*Officer response:*

*Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.*

- Winneycroft Farm – suitable for housing development

*Officer response:*

*Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.*

- Elmbridge and Pirton Court – suitable for housing, mixed-use, park and ride, transport hub

*Officer response:*

*Noted – This site lies within Tewkesbury Borough and was identified in Local Transport Plan 3 as a possible location for a transport interchange including a Park and Ride and 'Parkway' train station for both Gloucester and Cheltenham*

- Eastern Avenue/Barnwood – suitable for employment development

*Officer response:*

*Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.*

- Bristol Road/Olympus Park/Waterwells – suitable for employment development

*Officer response:*

*Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.*

- Gloucester Business Park – suitable for employment development

*Officer response:*

*Noted – The development of sites within the administrative boundary of Gloucester City will be pursued through the emerging Gloucester City Plan.*

### **Tewkesbury urban area**

- Northway – suitable for retail park, e.g. Ikea

*Noted - Land at Northway may be suitable for some small scale retail development to serve residents of the area, however in line with national policy large scale retail development is more appropriately situated within or adjacent to town centres to aid access by a choice of means of transport. The location of any large scale retail park will be considered as part of the Joint Core Strategy.*

- Ashchurch MOD base (if closed) – suitable for employment development

Officer response:

*Locations for strategic development are being considered through the Joint Core Strategy process. This will be considered in the next stages of the Core Strategy. Any redevelopment of large brownfield sites will be assessed in terms of its ability to contribute to sustainable communities*

- Mythe land – suitable for housing development

Officer response:

*Locations for strategic development are being considered through the Joint Core Strategy process. This will be considered in the next stages of the Core Strategy.*

- Mitton land – suitable for housing development

Officer response:

*Locations for strategic development are being considered through the Joint Core Strategy process. This will be considered in the next stages of the Core Strategy.*

- Wingmoor Farm – to be returned to community use as public open space

*Noted - The remediation and landscaping of land at Wingmoor Farm after it's close as a landfill site will be dealt with by the County Council as the waste planning authority. However, the long term use of Wingmoor Farm as a landfill site is being pursued by the Gloucestershire Waste Local Plan currently being developed by County Council.*

- Tewkesbury/Northway – suitable for mixed-use development, subject to the caveat that any development should not extend to the east beyond the B4079 at Aston Cross or impact on the settlement of Pamington

*Noted – Development at this location together with potential impacts on the landscape will be considered as part of the Joint Core Strategy.*

- Land at Tewkesbury Park Fields (Lincoln Green Lane) – suitable for housing development

Officer response:

*Locations for strategic development are being considered through the Joint Core Strategy process. This will be considered in the next stages of the Core Strategy. Land at Lincoln Green Lane falls within the registered battlefield boundary.*

- Land at Tying House – suitable for housing development

Officer response:

*This site does not present a location for strategic development. Smaller sites will be considered through the rural settlement strategy in later stages of Tewkesbury's development plan.*

- Land at Banady Lane – suitable for housing development

Officer response:

*This site does not present a location for strategic development. Smaller sites will be considered through the rural settlement strategy in later stages of Tewkesbury's development plan.*

- Land at Banady Lane – suggested for designation as Important Open Space

Officer response:

*The inclusion of land as important open space will be in later stages of Tewkesbury's development plan*

- Land at Two Hedges Road – suitable for housing development

Officer response:

*This site does not present a location for strategic development. Smaller sites will be considered through the rural settlement strategy in later stages of Tewkesbury's development plan. This land also falls within the Green Belt and development of this site would need to be assessed against emerging policy.*



- Land at Stoke Orchard (Coal Research Establishment) – suitable for mixed-use development  
Officer response:  
*This site is the subject of a current planning application for mixed use development.*
- Land south of Bredon Road – suitable for housing development  
Officer response:  
*This site does not present a location for strategic development. Smaller sites will be considered through the rural settlement strategy in later stages of Tewkesbury's development plan.*

## 21 Recommended reading

Respondents highlighted the following documents/initiatives for the attention of the JCS team:

- Building for Life
- CABE/RIBA space standards
- CPRE, Affordable Rural Housing Commission report: A sustainable future for rural affordable housing?
- Study into the Environmental Impacts of Increasing the Supply of Housing in the UK, April 2004
- UK Low Carbon Transition Plan:  
[www.decc.gov.uk/en/content/cms/publications/lc\\_trans\\_plan/lc\\_trans\\_plan.aspx](http://www.decc.gov.uk/en/content/cms/publications/lc_trans_plan/lc_trans_plan.aspx)
- England's Trees, Woods and Forests - Delivery Plan 2008-2012: [www.forestry.gov.uk/etwf](http://www.forestry.gov.uk/etwf)
- Woodfuel Strategy for England: [www.forestry.gov.uk/england-woodfuel](http://www.forestry.gov.uk/england-woodfuel)
- Meeting the Housing Requirements of an Aspiring and Growing Nation
- Cotswolds AONB Management Plan
- Local Quality of Life Indicators - Supporting Local Communities to Become Sustainable, Public Sector National Report, AC August 2005
- Safer Places - The Planning System and Crime Prevention (ODPM/Home Office, 2004)
- [www.securedbydesign.com](http://www.securedbydesign.com)
- [www.saferparking.com](http://www.saferparking.com)
- UK Low Carbon Transition Plan
- 2008 Survey of Renewable Electricity and Heat Projects in South West England
- The Taylor Review, 2008
- Better Places to Play Through Planning, Play England
- Exemplar sustainability policies: Uttlesford District Council's policy for off-setting carbon emissions of extensions, Milton Keynes' 'Tariff', and Merton's 'Rule'
- Research by Cycling England: [www.dft.gov.uk/cyclingengland/site/wp-content/uploads/2009/03/planning-for-cycling-report-10-3-09.pdf](http://www.dft.gov.uk/cyclingengland/site/wp-content/uploads/2009/03/planning-for-cycling-report-10-3-09.pdf)
- Department for Transport on the costs/benefits of cycling: <http://live-webtag.dft.gov.uk/documents/expert/unit3.14.php#057>
- Friends of the Earth's *Get Serious about CO2* campaign:  
[www.foe.co.uk/campaigns/climate/get\\_serious/index.html](http://www.foe.co.uk/campaigns/climate/get_serious/index.html)

# Joint Core Strategy Consultation Response Report

## D. Part 1 Online Consultation

### 22 Purpose of the online consultation.

The latter part of this report summarises the results of the *Part 1* consultation, in line with the five parts of the questionnaire: Spatial Portrait, Key Issues, Vision, Strategic Objectives, and general comments. This is followed by areas of common ground and disagreement.

### 23 Summary of responses received

#### Spatial Portrait

Seven responses received (17%) were in full support of the Spatial Portrait. Only one respondent disagreed with the Spatial Portrait and the majority of respondents sought clarification on specific issues or suggested alternative wording.

The following were highlighted for further consideration in future drafts of the Spatial Portrait:

- Achieve a better balance between urban and rural issues, and between the positive and negative characteristics of the sub-region.

Officer response:

*Agree – A rural strategy will be prepared which will focus on the need of the rural communities to ensure that development will be provided within both urban and rural locations.*

- Include the canal corridor, River Avon and the Green Belt as key features of the JCS area.

Officer response:

*Noted.*

- Provide more detail on regeneration initiatives and their objectives – e.g. the Tewkesbury Town Centre Masterplan, GHURC and Civic Pride.

Officer response:

*Noted – The JCS recognise the importance of the regeneration initiatives, although repetition of existing documents should be prevented. Cross referencing could be used to prevent repetition.*

- Give consideration to the hierarchy of settlements e.g. Bishops Cleeve and Winchcombe were described by respondents as main settlements in the JCS area and were compared to Brockworth and Churchdown in terms of scale/services, while clarity was requested over the term Tewkesbury/Northway.

Officer response:

*Noted – The hierarchy of settlements will be re-considered. Further justification should be provided should a settlement not be included as a main settlement.*

- Consider the strategic role and future of Gloucestershire Airport.

Officer response:

*Noted.*

- Concern was expressed that statements on population, employment, employment land, households, skills, crime etc, must be backed up by evidence.

Officer response:

*Agree – The JCS have an evolving evidence base which will support and influence the core strategy and development management policies.*

#### Key Issues

Four of the forty respondents fully agreed with the Key Issues and only two respondents disagreed. A majority of respondents (85%) sought clarification on specific issues or suggested alternative wording.

Comments applying to all Key Issues are summarised, followed by comments that were specific to particular Key Issues:

- Achieve a better balance between urban and rural issues, and between the positive and negative characteristics of the sub-region.

Officer response:

*Agree – A rural strategy will be prepared which will focus on the need of the rural communities to ensure that development will be provided within both urban and rural locations.*

- Consider the prioritisation of issues and objectives.

Officer response:

*Noted.*

- Include community safety (crime and fear of crime) and the need for cross-boundary working as key issues.

Officer response:

*Noted.*

- Consider the evidence provided in the South West Regional Spatial Strategy and West Midlands Regional Spatial Strategy.

Officer response:

*Agree – The evidence base behind the RSS's can be beneficial to the JCS even if the proposed outcomes were not supported locally.*

#### Key Issue A – Risk of lack of self-reliance and complementarity between settlements

- Editorial comments only.

#### Key Issue B – Regeneration of urban areas

- State the importance of this historic environment and identify opportunities for regeneration outside of urban centres in 'other parts of built-up areas'.

Officer response:

*Agree – The JCS recognise that there are opportunities for regeneration outside of urban centres. The rural strategy will help identify these issues.*

#### Key Issue C – Regeneration of urban areas

- Emphasise the distinctiveness of the local economy.

Officer response:

*Agree – The JCS recognise the importance of the local economy and believes there are opportunities to emphasise this within the core strategy.*

#### Key Issue D – Increasing demand for housing and particularly affordable housing

- Consider the difference between housing 'need' and 'demand' (in accordance with strategic objective 3, housing)

Officer response:

*Agree – The JCS development management policies will clarify these issues in accordance with the requirements of PPS3.*

- Refer to the County Council's housing/population projections.

Officer response:

*Agree – Gloucestershire County Council have prepared population and household projections which will establish future need. These results will contribute to the data required within the econometric model which will test affordable housing criteria across the JCS area.*

- Refer to accommodation for students, families and the elderly.

Officer response:

*Agree – The JCS recognise the importance for all members of society to have access to a decent home.*

- A conflict was highlighted between respondents who want 'brownfield sites to be redeveloped before Greenfield sites', and respondents who believe that adequate brownfield capacity does not exist so peripheral 'major growth locations' must be considered with a view to securing associated infrastructure improvement.

Officer response:

*Noted – In order for the JCS to create a 'sound' plan, additional sites on the periphery of existing built up areas will be required to meet the requirements of the future populations.*

#### Key Issue E – Low skills and poor education attainment

- Refer to apprenticeships, higher education and the high calibre of schools in the JCS area.

Officer response:

*Noted.*

- Use 'Disparity in skills and educational attainment' as an alternative description.

Officer response:

*Noted.*

Key Issue F – Job provision, lack of employment and economy

- Refer to apprenticeships and the distinctiveness of the local economy.

Officer response:

*Noted.*

Key Issue G – Deprivation

- No comments received.

Key Issue I – Public transport and congestion

- Refer to home working and expansion of broadband provision.

Officer response:

*Agree – The JCS recognise that working arrangements have changed and more people are deciding to work from home. In order to allow this to be an option to all, broadband infrastructure should be available to all communities in the JCS area.*

- Refer to the possibility of an ultra-light railway connecting Gloucester and Cheltenham.

Officer response:

*Noted.*

Key Issue J – Flood Risk

- Refer to risk from both pluvial and fluvial flooding, and to the risks associated with development on or close to high flood risk areas.

Officer response:

*Agree – The JCS recognise the sensitivity of flooding in the JCS area following the 2007 floods. The location of development will be subject to the tests within PPS2 and the SFRA2 will also identify complex flood risk assessments for some broad location sites.*

Key Issue K – Risk to natural environment assets.

- Refer to the Green Belt.

Officer response:

*Noted – The Green Belt review will identify areas of the Green Belt which perform well and less well to the functions set out in PPG2.*

Key Issue L – Climate Change

- Refer to the reuse and adaptation of heritage assets (in accordance with PPS5).

Officer response:

*Noted.*

Key Issue M – Provision and protection of cultural, leisure and tourism offers

- Refer to major sporting facilities such as Cheltenham racecourse.

Officer response:

*Noted.*

Key Issue N – Providing for inclusive communities.

- No comments.

## **Vision**

Six of 41 respondents agreed with the Vision and two respondents disagreed. The majority of respondents (80%) sought clarification on specific issues or suggested alternative wording.

- Achieve a better balance between urban and rural issues.

Officer response:

*Agree – A rural strategy will be prepared which will focus on the need of the rural communities to ensure that development will be provided within both urban and rural locations.*

- Include the Green Belt, affordable housing, education, employment, rural public transport, agriculture/forestry and the need to sustain rural services as key elements of a Vision for the JCS area.

Officer response:

*Noted.*

- Consider the status/hierarchy of settlements.

*Officer comment:*

*Agree – A rural strategy will be prepared alongside a settlement audit. This will enable the JCS to identify suitable levels of development within the rural areas.*

- Consider the difference between housing 'need; and 'demand' (in accordance with Strategic Objective 3, housing).

*Officer response:*

*Agree – The JCS development management policies will clarify these issues in accordance with the requirements of PPS3.*

- Refer to the value of the existing natural and built environments in attracting business investment/job creation.

*Officer response:*

*Agree – The JCS area is a pleasant and attractive part of the country which should be emphasised within the JCS to attract future investment and new development.*

- Refer to opportunities for improved bus/coach routes and better rail services with stations redeveloped to become destinations and add capacity.

*Officer response:*

*Noted.*

- Refer to flood prevention, drainage maintenance, flood management and locally generated green energy.

*Officer report:*

*Noted – Such details will be referred to in more detail within the JCS development management policies and the supporting evidence base.*

### **Strategic Objectives**

Four of the forty-one respondents fully agreed with the Strategic Objectives and one respondent disagreed. The majority of respondents sought clarification on specific issues or suggested alternative wording.

General comments which apply to all Strategic Objectives are summarised first, followed by comments that were specific to particular Strategic Objectives.

- Achieve a better balance between urban and rural issues. Specifically, investment in agriculture, increased agricultural output and increased/secure local food production were all suggested as key Strategic Objectives for the JCS area.

*Officer response:*

*Noted.*

- Include green energy generation as a Strategic Objective.

*Officer response:*

*Noted.*

- Consider the deliverability of the Strategic Objectives in light of the current economic climate.

*Officer response:*

*Noted – although the economic climate is likely to change over the 20 year plan period.*

### **Strategic Objective 1 – Regeneration**

- Consider regeneration outside, as well as inside, core urban centres (including villages and rural settlements) and uncertainty of investment resulting from the current economic climate.

*Officer response:*

*Agree – The rural strategy and settlement audit will help identify which areas are capable of enabling additional future development.*

- Monitor investment into deprived wards and evaluate the impacts to help direct subsequent initiatives.

*Officer report:*

*Noted.*

#### Strategic Objective 2 – Jobs and Economy

- No comments received.

#### Strategic Objective 3 – Housing

- Refer to the provision/improvement of infrastructure (including transport, social, green, etc) through new housing development and to catering for the disabled community.

Officer response:

*Agree – Infrastructure provisions will be required with any development to assist the new and existing communities.*

- Several respondents suggested that redeveloping brownfield sites before Greenfield sites should be a Strategic Objective. Other respondents suggested that urban areas do not have capacity for the necessary homes and employment, so a phased approach including development of peripheral 'major growth locations' should be considered with a view to securing associated infrastructure improvement.

Officer response:

*Noted – It is likely that strategic developments within the JCS will be phased to ensure that adequate infrastructure is provided.*

#### Strategic Objective 4 – Skills and Education

- No comments received.

#### Strategic Objective 5- Access to services and healthcare

- Refer to the disabled community as a special interest group.

Officer response:

*Noted.*

#### Strategic Objective 6 – Transport

- Refer and give prominence to the M5 as a strategic gateway.

Officer response:

*Noted.*

- Include the improvement of public transport in rural areas (to reduce private car usage) as a Strategic Objective.

Officer response:

*Noted – LTP3 will focus on this issue in more detail. However, the JCS recognise the importance for all communities to have access to public transport.*

#### Strategic Objective 7 – Flooding

- Prohibit development on flood plains, or on areas likely to flood, or on areas which might prompt flooding elsewhere, considering both fluvial and pluvial flooding.

Officer response:

*Agree – The JCS will ensure that suitable flood mitigation measures are considered when developing in flood risk areas. In addition, the tests set out in PPS25 should be adhered to and the evidence within SFRA2 can assist with FRA's.*

- Integrate flood planning with planning of the natural environment/land management to reduce and mitigate the effects of flooding – e.g. plant woodland uphill or housing to reduce run off.

Officer response:

*Noted.*

#### Strategic Objective 8 – Natural Environment

- Refer to the Green Belt and ensure language is in accordance with PPS5.

Officer response:

*Noted.*

#### Strategic Objective 9 – Climate Change

- No comments received

#### Strategic Objective 10 – Culture, Leisure and tourism

- Refer to the areas world-class sporting and cultural festivals and to the canal corridor.

Officer response:

*Noted.*

## General Comments

60 responses were received under General Comments. Responses covered a range of issues from spelling and grammar, additional wording and more specific issues and topics which were considered important to the *Part 1* document.

- Provide explanation of the evidence that has informed Part 1.

Officer response:

*Noted.*

- Explain how the Vision and Strategic Objectives will be delivered, by whom and when (particularly in light of the current economic climate and public sector funding cuts).

Officer response:

*Noted.*

- Achieve a better balance between urban and rural issues.

Officer response:

*Agree – the rural strategy will create a better balance in the JCS and will consider all areas within the JCS area.*

- Promote the M5 corridor as the areas major transport link to the rest of the UK. Support the provision of a new train station between Gloucester and Cheltenham.

Officer response:

*Noted – LTP3 focuses on these issues in more detail. The JCS are preparing an infrastructure delivery plan which will identify future infrastructure requirements to assist an increasing population.*

- A large number of respondents expressed concerns over the future of Bishops Cleeve and land at Leckhampton/Shurdington which were identified as Areas of Search for Sustainable Urban Extensions in the South West Regional Spatial Strategy. Such responses sought to protect these areas from development due to concern for Green Belt, flooding, traffic and landscape issues, for example.

Officer response:

*Noted – all of these issues will be considered when potential Broad Locations are identified.*

- The permanent line of parked buses along the Promenade is inhibiting and should be removed and the Promenade paved as pedestrian area, restoring what is now a congested traffic route to a major public space.

Officer response:

*The relocation of the bus terminals are being considered as part of Cheltenham Development Taskforce.*

- Traffic congestion and pollution in the entire JCS area can be tackled by balancing existing communities, rather than creating new balanced communities. The existing ones should be given adequate provision of green transport facilities.

Officer response:

*Noted. Financial provisions from new developments can contribute to new and existing infrastructure. The JCS will ensure that infrastructure provisions and community facilities are inter-connected to create vibrant balanced communities.*

- Reference is made to the considerable identified need for homes, especially affordable homes across the JCS, yet there is no evidence to back this up.

Officer response:

*Noted – A mixture of market housing and affordable housing will be provided across the JCS area. A Strategic Housing Market Assessment has been produced by Gloucestershire County Council working with the six authorities which comprise Gloucestershire. The report forms part of the JCS evidence base and can be used to assess housing need and demand in order to develop policies.*

- The location for new homes cannot be made entirely within the existing urban areas. The issue should recognise that the most sustainable locations for growth at the required scale will include peripheral urban extension locations, including land at Tewkesbury.

Officer response:

*Agree – Due to the urban capacity of the built up JCS areas, it is recognised that peripheral development would be required to accommodate the future populations. The strategic development scenarios which will be consulted upon in the developing preferred options*

*consultation will illustrate broad locations which will form strategic developments across the JCS area.*

- The flood and water management proposal provided by the Severn and Avon Valley combined Flood Group should be used as a Supplementary Planning Design document across the JCS area.

Officer response:

*Noted – Any supplementary planning documents will be published following the JCS. At this stage of the JCS it has not been agreed which and how many supplementary planning documents will be required to support the JCS and its core policies.*

- Is the impact on green belt different if houses were attached to the village rather than an urban extension?

Officer response:

*Noted – The Green Belt Study for the JCS area will identify which areas of the Green Belt are most and least achieving the five purposes which are set out in PPG2. This will help establish if those areas on the edge of existing built up areas contribute significantly to the purposes of the Green Belt.*

- The document is superficial, the issues identified were meaningless and that the JCS is merely treading water and filling a gap as the LDF cannot move forward without clear guidance. This is just a stop gap to deal with current housing applications.

Officer response:

*Noted – The JCS will replace the policy void following the abolition of the RSS. The JCS is now required to identify future housing/employment sites for the next 20 years based upon local need and a supporting evidence base.*

- Climate Change - Although volume house builders have a responsibility to devise and develop layouts and dwelling types that are able to make a positive contribution towards a low-carbon future, the local authority should seek to have a more reconciliatory stance to resolving local issues sharing best practice and 'gap funding' renewable energy projects where applicable (i.e. Combined Heat and Power Systems).

Officer response:

*Noted – Such issues will be considered and encouraged in development management policies.*

## **24 Recommended Reading**

Respondents highlighted the following documents/initiatives for the attention of the JCS team:

- Cheltenham Festival's Annual Review
- Gloucestershire County Council's Research and Intelligence Unit Population Report
- Circular 04/2007: Planning for Travelling Showpeople
- PPS5: Planning for the Historic Environment
- Policies for Spatial Plans section 4.3 – Planning Officers Society, 2005
- Strategy for England's Trees Woods and Forests
- UK Biodiversity Partnership, 'Conserving Biodiversity in a changing climate: guidance on building capacity to adapt' (2007)
- Natural Environment and Rural Communities Act 2004
- DEFRA's guidance for Local Authorities on Implementing the Biodiversity Duty (May 2007).



# E. Outcomes of Consultation Activities

## 24 Common ground and competing viewpoints – Issues and Key Questions

The consultation has highlighted an incredibly broad range of issues – both complementary and competing – which the JCS must seek to balance in accordance with best planning practice and the requirements of PPS1 *Delivering sustainable development*. Key areas of common ground and disagreement include but are not limited to the following:

### Common ground

- Support for the principal of joint working between the three JCS authorities and cooperation with neighbouring authorities.
- The need to prepare for, adapt to, and mitigate the impact of climate change – particularly with regards to flooding – and to secure socially, economically and environmentally ‘sustainable development’.
- The need to address and improve rural and urban areas in a balanced way.
- The need to provide adequate social infrastructure, transport, jobs and services for existing populations and any new development.
- The need to plan for employment, education and training for a secure economic future.
- The need to address inequalities in wealth, housing, education, employment and infrastructure provision.
- The need to link any housing development to employment and to local housing need (e.g. families and the elderly).
- The need for high design and energy standards in all aspects of development, at all scales, from the proposed urban extensions to street furniture.
- The need to provide good access to the countryside and green/open spaces – and the Green Infrastructure approach as one of a suite of methods to help secure it.

### Competing viewpoints / areas of tension

<b>Sustainability</b>	
The need to secure socially, economically and environmentally ‘sustainable development’.	Widely differing definitions of what is ‘sustainable development’.
Strong support for the principal of sustainable energy generation.	Significant opposition to visible/intrusive sustainable energy sources, particularly in rural areas or the AONB.
<p>Calls to reverse the decline of rural settlements and secure sustainable rural communities – without compromising their character.</p> <p>Concern for demographic change in rural areas (the pricing-out of young families).</p>	<p>Rural settlements’ vicious circle of declining services/employment, poor transport connections and ageing populations – all contributing to a common view that these are not sustainable locations for development.</p> <p>Frequent opposition to any significant rural development; and the failure of small-scale development to secure population thresholds large enough to support the desired local services.</p>
<b>National and regional planning</b>	
Perceived inadequacies in evidence for the growth levels (and SUEs) set out in the RSS, and resulting calls for the JCS to stand firm in opposition to central growth targets.	Statutory requirements for the JCS to be in accordance with national and regional planning policy.
Calls to provide for local community needs, not regional housing targets.	Population mobility, a free market in housing, and the JCS area’s continued appeal to residents of other towns and regions.

Perceived inadequacies in the floodplains defined by the Environment Agency (EA) following local experiences in 2007.	Statutory requirement for the JCS to work with the EA and EA data.
<b>The housing market</b>	
<p>Strong concern for housing affordability.</p> <p>Calls for the conservation of natural/built environments, and brownfield-before-greenfield development.</p> <p>Cynicism for the profit motive of developers.</p>	<p>Perception that housing need cannot be accommodated on brownfield sites alone.</p> <p>Calls for the phased development of brown/greenfield sites to ensure housing delivery, affordability and choice.</p> <p>Technical and financial constraints on the development of brownfield land.</p> <p>Likely continued growth in housing demand, primarily resulting from the UK's historic failure to build adequate new housing, plus the decline in household size and longer life-expectancy.</p>
The negative impact of the current recession on development activity/viability and housing demand.	The long-term view of the JCS to 2026, covering multiple economic cycles.
<p>Calls for the provision of family housing in preference to flats.</p> <p>Calls for the conservation of urban and rural character and heritage.</p>	<p>Calls for higher density housing in urban areas to deliver more housing per unit area.</p> <p>The perceived suitability of urban brownfield sites for flatted development.</p> <p>The perceived suitability of urban-edge greenfield sites for family housing development.</p>
Calls for limited development of affordable, family housing in rural areas for local people – e.g. 10-20 houses per village was commonly cited.	<p>The need to provide affordable housing through development of market housing.</p> <p>Frequent opposition to any significant rural development.</p> <p>Misperception of the amount of housing such a strategy would deliver (e.g. if averaged across the 65 settlements in Tewkesbury Borough, only 650-1,300 new dwellings would be provided for a population of more than 300,000).</p> <p>Population mobility, a free market in housing, and the JCS area's continued appeal to residents of other towns and regions.</p>
Historic failure to address the needs of Gypsies and Travellers, and their right of access to social infrastructure.	Historic concern from the settled community for the location and concentration of sites, and the impact on areas of environmental designation.

## 25 Common Ground and competing viewpoints – Part 1 Online Consultation

The consultation revealed little objection and some support for the materials presented. However, a broad range of issues were put forward for further consideration and a substantial number of specific clarifications and suggestions were made which the JCS team must seek to balance in accordance with best planning practice and the requirements of PPS1, Delivering Sustainable Development.

From the 297 comments received, 60% did not offer specific support or opposition to a concept, but instead answered 'Other' and frequently provided further commentary. There will be another opportunity to comment on the JCS Part 1 in the *Developing Preferred Options* consultation in December 2011.

The most common issues raised include:

- The need to balance rural and urban issues and ambitions.
- The need to promote the positive features of the area as well as addressing the negative.
- The need to provide a clear hierarchy of settlements.
- Concern for flooding, heritage and environment issues.
- The need to base Part 1 on clear evidence. It should be noted in response to this point that all evidence will be provided in supporting documents but not within the constituent sections of Part 1 which are intended to provide succinct and readable summaries of that evidence, not the evidence itself.

## 26 Consultation Activities in 2011

Following the *Issues and Key Questions* and *Part 1* consultations, the JCS team have been undertaking many consultation activities in preparation of the *Developing Preferred Options* Consultation. The details below give an indication of the additional consultation events which have taken place during 2011.

Event	Audience	Outcome
Cross Boundary Programme Board (monthly meeting)	JCS Chief Executives & Strategic Directors	JCS updates and decision making.
Members Steering Group seminars	Elected members	JCS updates.
Parish Council seminars/meetings	Parish councillors	Question and Answer session on the progress of the JCS.
SHLAA site assessment panels	Housing Market Partnership	Discuss the site assessment summary, general SHLAA and the housing trajectory.
Broad Location developer meetings	Various developers, consultancies, land owners and specific consultees.	Discussion of broad location sites.
Three Bridges Neighbourhood Partnership	Members of three Bridges Neighbourhood Partnership	Discussion about the JCS in the context of Gloucester City Plan consultation.
Member training sessions	All elected members and MP's across the JCS area.	Discussed emerging evidence base for the JCS – Green Belt Review, SHLAA and SFRA2.
External meeting	Cheltenham Local Strategic Partnership	Briefing on JCS activities and update on key milestones.

Tewkesbury Borough Council	Elected Tewkesbury Borough members	Question and answers with members on the JCS.
Matson and Robinswood Neighbourhood Partnership	Members of the R&M NP	Discussion about the JCS in the context of the Gloucester City Plan consultation.
Parish and town council presentation	Members	Raising awareness of the JCS and its progress.
External meetings	Leg Lag and Save the Countryside	Update of the JCS
Meeting with Gloucestershire Rural Community Council	Officers of GRCC	Advised of JCS autumn/winter consultation and requested GRCC assistance and expertise in engaging with rural communities during consultation.
Meeting with political groups	Elected members	Discuss the emerging proposals for the JCS.
JCS newsletter	Elected members and general public	Update of the JCS

## 27 Next steps

The JCS team are analysing this report alongside all other evidence gathered with a view to developing options, for further public consultation in December 2011. The consultation is anticipated to include a revised Part 1 and will identify Broad Locations for development around the periphery of existing urban areas.

A rural strategy and settlement audit will also be prepared to address the rural communities within the JCS area.

## 28 Lessons learnt

Observation	Lesson learnt / outcome
<b>Event locations and attendance</b>	
Need to maximise attendance and ensure a range of communities are reached	Ongoing review of all event locations. Consider including new areas – e.g. Barton in Gloucester  Outdoor exhibitions (Cheltenham Promenade and Gloucester Kings Walk) were popular, however time of year and weather should be considered when choosing venues
<i>Public</i> Some complaints received regarding notice period for events and meetings  Attendance at events was often poor after 7pm	Endeavour to provide more notice, and to maximise publicity (see below)  Review opening times to ensure efficient use of Officer time and make the exhibitions as effective as possible. E.g.

Some exhibitions benefited from 'passing trade' attracted by other events happening at the same time and location	public exhibitions to close at 7pm, rather than 8pm  Consider specifically piggy-backing other events to increase attendance and share costs where possible. This principle particularly applies to other public consultation events that may be happening in the JCS area
<i>Members</i> Need to maximise attendance by Members  Better response obtained from Members by letter than email	Continue to maintain up-to-date list of all Council meeting dates and plan consultation events accordingly  Inform Members of JCS process and activities by letter – consider duplicate email clearly flagged as such
Security: One meeting of the Member Steering Group was attended by uninvited members of the media	Provide list of invited attendees and check attendance on the day to ensure media contact is managed appropriately by the CBC Communications Team
<b>Publicity</b>	
Several Parish Councils provided excellent publicity promoting local exhibitions (at no cost to the JCS team)	Provide adequate notice and encourage Parish Councils to promote events in all correspondence. Where Parish Councils do not exist, Members could play a vital role
Coverage in the press was good and needs to be maintained	Continue to work with all local media
<b>Resources and materials</b>	
Some exhibitions were initially over-staffed, making it difficult for visitors to approach the stand and engage. Officers were sent home accordingly, leaving adequate cover, but this could be improved.  Staff observed a cycle where more interest was attracted when people were seen talking to officers, and less when 'spare' officers were waiting for interest	Ongoing review of staffing to ensure efficient use of Officer time and to maximise the exhibition's appeal to the public. As a rule, stands need a maximum of two officers, or three in the busiest locations (G/C/T town centres) at the busiest times (Saturday lunchtime / afternoon)
Having a variety of means to get involved proved very popular with the public. Post-it notes, dot-maps and questionnaires were all very successful. Appropriate deposit boxes for questionnaires were not always provided however	Provide neat, clearly-labelled deposit boxes for questionnaires at all events
Some respondents were unsure of terminology used in the questionnaire despite efforts to employ plain English – specifically: 'public realm'	Ongoing review of materials for consistent use of plain English
Dot-maps worked well as posters, but also when placed on tables with seating where they became centres for some prolonged and interesting debates	Provide tables and chairs with dot-maps where possible
The A3 constraints map was not easy to read	Review colour-coding of constraints map

for some respondents	
Some respondents requested more detailed, local maps to aid discussion of local issues	Consider provision of locally-relevant maps at a larger scale than the JCS area maps. Balance provision with need to maintain strategic focus for JCS
Display material/posters worked well, however Officers felt the amount of text could be reduced and the amount of graphics/images increased accordingly to make the materials more eye-catching to passers-by	Consider the balance of text/images for posters and pop-up branding banners at future exhibitions. Graphics/images attract attention, but text is required by those who do not wish to speak to Officers but prefer to stand and read
Some display stands were looking tired by the end of the consultation period	Replace any damaged display stands, or rotate for newer ones as necessary