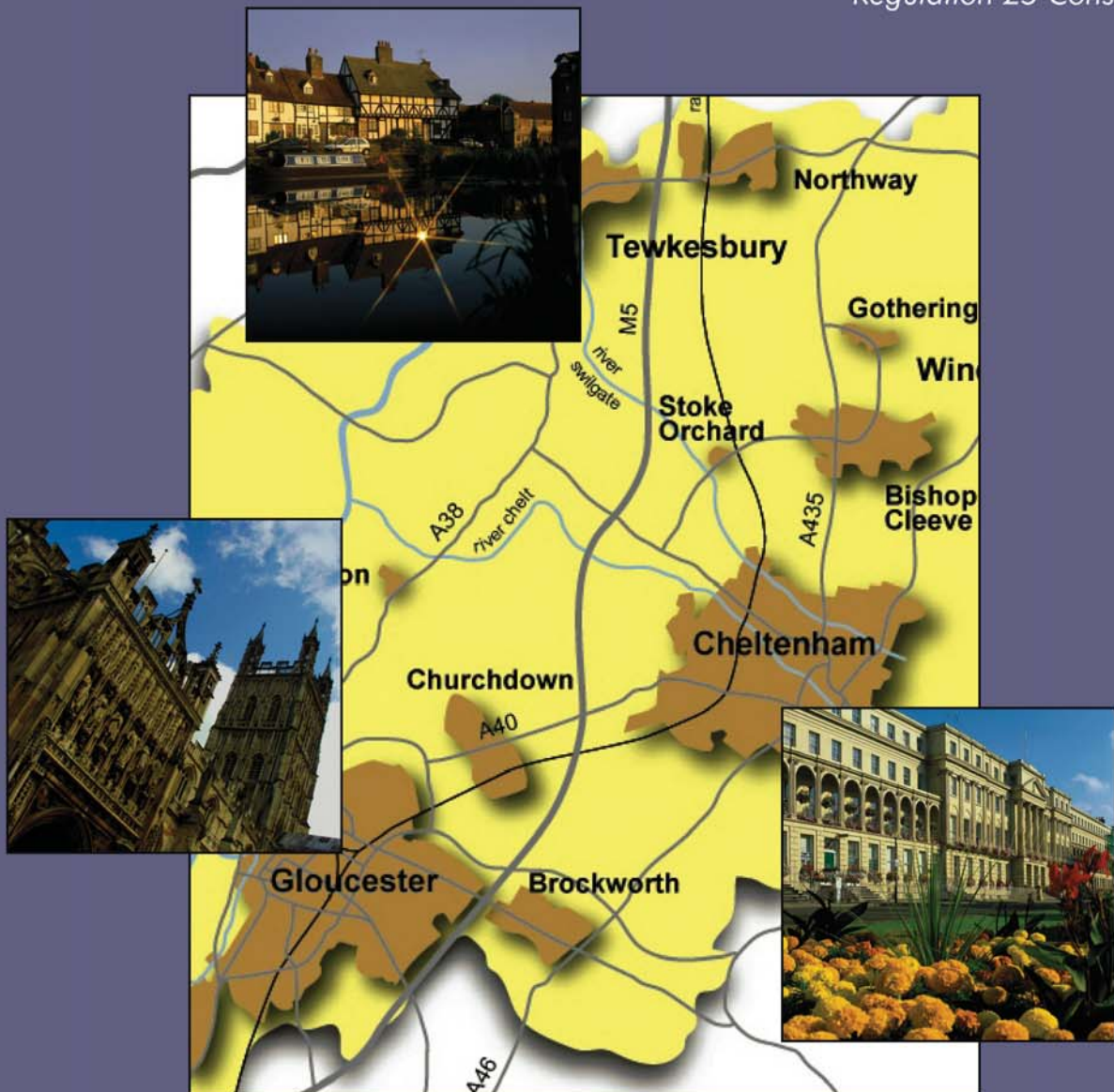




GLOUCESTER, CHELTENHAM, TEWKESBURY JOINT CORE STRATEGY ISSUES & KEY QUESTIONS

November 2009 - February 2010

Regulation 25 Consultation



Foreword

In 2008, the Councils of Gloucester City, Cheltenham Borough and Tewkesbury Borough decided to prepare a Joint Core Strategy. This will have many benefits to planning a sustainable future for all three Council areas.

This consultation document is the first stage in producing the Joint Core Strategy and has regard to the Regional Spatial Strategy for the South West - Secretary of State's Proposed Changes. The Regional Spatial Strategy for the South West has still not been formally published. The Government advises that the Regional Spatial Strategy for the South West - Secretary of State's Proposed Changes should be used as a material planning consideration in the planning process when considering applications for proposals contained within it. The development industry therefore may not wait for the Government to publish the Regional Spatial Strategy and the Planning Inspectorate is likely to come under pressure to make decisions on planning appeals in advance of its publication.

Gloucester City, Cheltenham Borough and Tewkesbury Borough have various significant objections to key aspects of the Regional Spatial Strategy for the South West, particularly in relation to unjustified urban extensions and unnecessary incursion into the countryside and Green Belt arising from its proposals for increased growth to unprecedented levels. Although the three Councils remain opposed to the conclusions contained in the Regional Spatial Strategy, as does the County Council, they feel it is vital to put plans in place to help to secure proper infrastructure should applications come forward for proposals within the Regional Spatial Strategy for the South West.

It is also necessary, for the good planning of the area, to ensure that an up-to-date development plan is in place to guide future sustainable development and safeguard environmental, social, economic and other key interests. The County Council is supportive of the partnership and is keen to ensure that any long term infrastructure requirements are addressed. It is leading on the development of a programme of potential infrastructure options.

In publishing this document the three Councils are inviting local communities and stakeholders to present their views and engage fully in the process of preparing the joint development plan.

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1. Introduction

1.1. This document has been produced by Gloucester, Cheltenham and Tewkesbury Councils working together to plan the future of the area. Its purpose is to raise awareness of the Key Issues that the area faces and to generate debate about how these could be addressed. The document is the first step towards developing a Joint Core Strategy that will set out the strategic plan for the three authorities and guide future development to the year 2026. On adoption, the Joint Core Strategy will become part of the statutory development plan for each authority.

1.2. Preparing a Joint Core Strategy will mean having to make choices about how the area will develop in the future. As a result it is important to consult local communities and stakeholders on what they think are the main issues facing the area today and what solutions may be required in the future.

1.3. This consultation document invites you to provide your views on:

- The Key Issues that need to be addressed;
- The Vision for the area;
- The topics the Joint Core Strategy should cover;
- What policies could be included within the Joint Core Strategy and what the priorities should be.

1.4. This document fulfils the requirements of Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2004, as amended.

Structure of the Document

1.5. This document is split into two parts. The first part is about Gloucester, Cheltenham and Tewkesbury Borough in 2009. It explains why a Joint Core Strategy is being produced, how it fits with other plans and summarises the evidence that has been collected for the area. It ends by listing what are considered the Key Issues that the Joint Core Strategy needs to tackle.

1.6. The second part is about the future. It outlines what could be included in a potential Vision for the area in 2026 and a set of Objectives which would need to be met to achieve the Vision. The second part also outlines the possible policy areas that the Joint Core Strategy will need to cover and asks for your views on them. Each topic area includes a brief description of relevant national or regional policy that applies to it before outlining what things need to be considered locally.

Why a Joint Core Strategy?

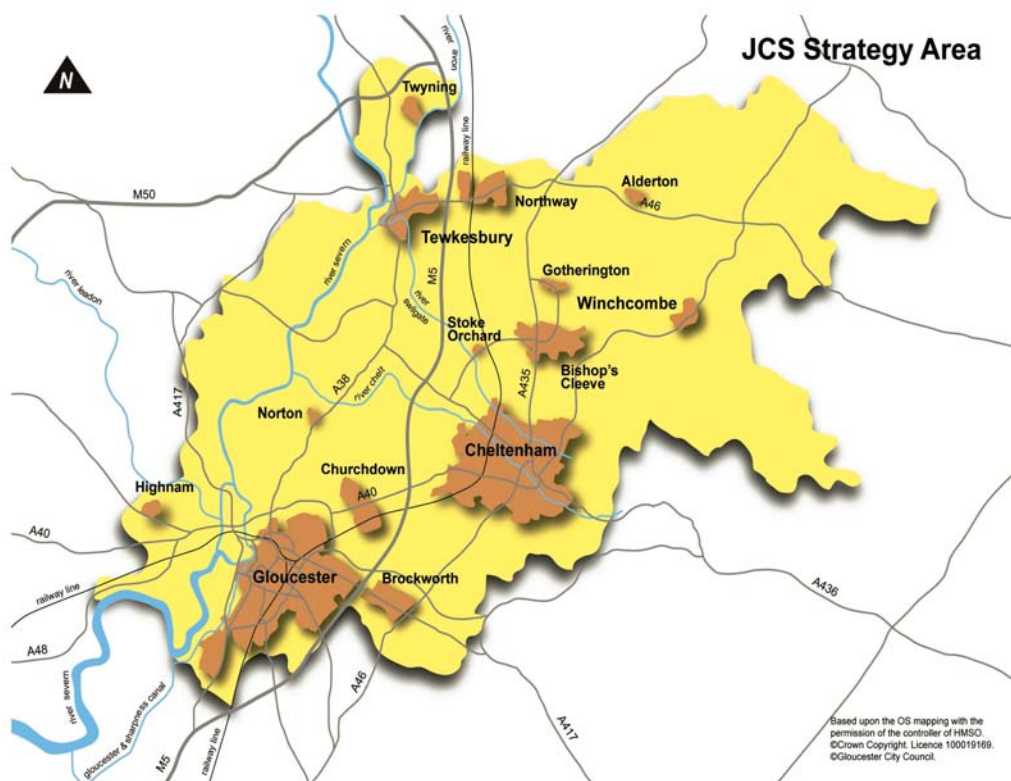
1.7. The decision to produce a Joint Core Strategy was made by all three Councils in July 2008. Working jointly means that the Councils can plan for the future at a strategic level and make sure that the three areas complement each other. This is particularly

important for Gloucester and Cheltenham because, by working together, the City and Town can act as a focus for the area and attract investment and jobs. Working together also means that rural communities will be included in planning for the future of the area and will benefit from increased economic opportunities.

What area will the Joint Core Strategy cover?

1.8. The Joint Core Strategy will be the key document in the development plans of Gloucester City, Cheltenham Borough and Tewkesbury Borough Councils as illustrated below.

Figure 1: Joint Core Strategy Area



How will the Joint Core Strategy relate to other plans?

1.9. The Joint Core Strategy will be a Development Plan Document and will form part of the three Councils' Local Development Frameworks. Local Development Frameworks were introduced as part of the new planning process brought in by the 2004 Planning and Compulsory Purchase Act as a replacement for Councils' Local Plans. For more information on Local Development Frameworks and the new planning system please visit <http://www.planningportal.gov.uk/uploads/ldf/ldfguide.html>

1.10. The new planning system also introduced a new type of regional planning document known as Regional Spatial Strategies. These will also form part of Councils' development plans for their area. The Regional Spatial Strategy for the South West has been prepared and undergone independent examination but has yet to be published and there remains some uncertainty about what it will contain in its final version. When it is published, the Joint Core Strategy will have to be in general conformity with its policies. At present, the most up to date version of the Regional Spatial Strategy is the Secretary of State's Proposed Changes version that was published in July 2008 following the report of the Panel appointed to examine the Draft.

1.11. In addition to the Regional Spatial Strategy, the JCS must also have regard to, and seek to deliver, a wide range of other plans and programmes prepared by each of the Councils and other stakeholders. For example, it must have regard to the Housing Strategies prepared by each authority and the Economic Development Strategies and initiatives in existence. For Gloucester and Cheltenham in particular, the Joint Core Strategy will need to reflect on the regeneration initiatives and proposals coming forward as part of the Gloucester Heritage Urban Regeneration Company and Civic Pride programmes respectively.

What else will influence the Joint Core Strategy?

1.12. Decisions taken in the Joint Core Strategy will need to be based on a strong understanding of the area and a robust evidence base. How, when and where necessary infrastructure can be provided will also be a key factor in decision making. At present the three Councils are preparing a range of evidence base studies. If you would like to view the evidence base, please visit www.gct-jcs.org/EvidenceBase

Links to the Sustainable Community Strategies

1.13. It is also crucial that the Joint Core Strategy delivers on some of the intentions of the four (including the county-wide) Sustainable Community Strategies produced by the Local Strategic Partnerships and the Gloucestershire Conference. A workshop was held in November 2008 where the Local Strategic Partnerships set out what they wished to be included within the Joint Core Strategy. The outcomes of that workshop are listed below.

1. Develop strong and complementary relationships between communities whilst retaining the local distinctiveness of the City, Spa Town, rural communities and suburbs.
2. Improved retail offer (shops).
3. Meeting the variety of housing needs of the communities across the Joint Core Strategy area.
4. Innovative solutions for transport, planning and urban design to increase the use of public transport.
5. Develop the employment portfolio of Gloucester, Cheltenham and Tewkesbury.
6. Develop the skills of people of all ages.
7. Enhance the cultural, leisure and tourism offer.

8. Mitigate contributions to climate change and ensure effective adaptations to help improve the resilience of the Joint Core Strategy area.
9. Reduce the risk of flooding and its impact.
10. Protect, manage and enhance biodiversity and the natural environment.
11. Deliver effective and ongoing social, economic and physical regeneration of Gloucester.
12. Improve health and access to healthcare for residents of Gloucester, Cheltenham and Tewkesbury areas.

1.14. A fuller and more detailed explanation of each of the above is available from the Joint Core Strategy Local Strategic Partnership Workshop Report, included within the evidence base for the Core Strategy.

1.15. For each of the Council's Sustainable Community Strategy, please visit <http://www.gct-jcs.org/Publications/SustainableCommunityStrategy.aspx>

What happens next?

1.16. Once all comments are received, a summary of the issues raised will be published. This will then be used to help prepare a Developing Preferred Options Joint Core Strategy for publication in September 2010. The full timetable for the Joint Core Strategy is set out below.

- Evidence Gathering Stage
- Issues and Key Questions Public Participation in November 2009
- Developing Preferred Options Joint Core Strategy in September 2010
- Pre-submission Draft in March 2011
- Submission Joint Core Strategy in June 2011
- Examination in the Autumn of 2011
- Adoption in December 2011.

Sustainability Appraisal

1.17. Local authorities are required under the Planning and Compulsory Purchase Act 2004 to test the Joint Core Strategy against a process known as Sustainability Appraisal, incorporating the requirements of the European Strategic Environmental Assessment Directive.

1.18. Sustainability Appraisal is a process that aims to ensure that plans achieve sustainable development. It does this by assessing how the plan's policies will impact on social, environmental and economic considerations and by recommending the most sustainable options available. Where a policy is likely to result in a negative social, environmental or economic effect, the appraisal process will recommend ways of lessening the effect or offsetting it.

1.19. A Sustainability Appraisal Scoping Report was produced and consulted on in October 2008. The Scoping Report set out a framework of Sustainability Objectives that would be used to assess the Joint Core Strategy. This has now been

revised to take account of consultation responses received and agreed with the statutory consultees for the Sustainability Appraisal process: the Environment Agency, English Heritage and Natural England. The revised framework of Sustainability Objectives is available online at www.gct-jcs.org.

1.20. Each section of this document includes a reference to the Sustainability Objectives that are appropriate to consider when making your response.

1.21. A full Sustainability Appraisal Report will be produced alongside the Developing Preferred Options Joint Core Strategy in September 2010.

1.22. For more information on the Sustainability Appraisal Scoping Report and the Sustainability Appraisal process in general please visit www.gct-jcs.org.

How to get involved

1.23. This document is all about getting your views. To make this easier, an online consultation system has been provided that allows you to read the document and comment online. You can access the system at <http://consult.gct-jcs.org/inovem>. You will need to register to make comments.

1.24. If you wish to see a paper copy of the document these are available at the deposit locations. You can also download a copy from the Joint Core Strategy website. In line with the Councils' policies towards green issues paper copies will only be supplied upon specific request and will be charged for. Response forms and any general comments can be sent to the following email address: info@gct-jcs.org

1.25. Or by post to: Joint Core Strategy Team
Municipal Offices
Promenade
Cheltenham
GL50 9SA

1.26. The deadline for responses is 5pm on 1st of February 2010.

1.27. If you have any questions about the document or if you would like a braille, large print, audio or alternative language copy, please contact us.

2. Policy Context

2.1. Although the Joint Core Strategy will be the key document in the three Councils' Local Development Frameworks, it is important to understand that it also needs to conform to national and regional policy. In addition and importantly, one of the changes brought in by the new planning system in 2004 is that documents produced at a local level should not repeat national and regional policy. This document aims to understand what local issues are dealt with sufficiently by national and regional policy and what are those that need a policy at local level?

What is National Planning Policy?

2.2. The new planning system brought a change to the way the Government sets out its approach to planning policy at a national level. This change essentially replaced previous guidance in the form of Planning Policy Guidance Notes, with a set of Planning Policy Statements. These Planning Policy Statements are now policy and are backed up by a range of Practical Guides that explain how policy should be implemented.

2.3. Planning Policy Statement 11 - Regional Spatial Strategies and 12 - Local Spatial Planning set out how regional and local bodies should prepare regional and local planning policy. For more information on national planning policy, please visit www.communities.gov.uk

What is Regional Policy?

2.4. Regional Spatial Strategies are planning policy documents prepared at a regional level and set the strategic policy framework for development across the region. Regional Spatial Strategies form part of the statutory development plan for every local planning authority in the region that they cover. As such, all local level planning policy documents have to be in general conformity with the Regional Spatial Strategy. In practice, this means that Regional Spatial Strategies set out broad policies for the future of their region, such as the number of new homes to be built in each area, the number of jobs to be provided and what level of infrastructure (such as roads, schools and hospitals) is required. It is then for local authorities to decide how best to implement these plans in their local area. The Joint Core Strategy area is situated in the South West region and, therefore, must be in general conformity with the Regional Spatial Strategy for the South West, when it is published.

What is the timetable for the Regional Spatial Strategy for the South West?

2.5. The Draft Regional Spatial Strategy was first published in June 2006 and was subject to Examination in Public between April and June 2007. Since the Examination, a Panel Report was published in January 2008, followed by the Secretary of State's Proposed Changes to the draft in July 2008. The Regional Spatial Strategy for the

South West was due to be finalised and published in June 2009 but this has been delayed. As yet, no revised publication date has been set.

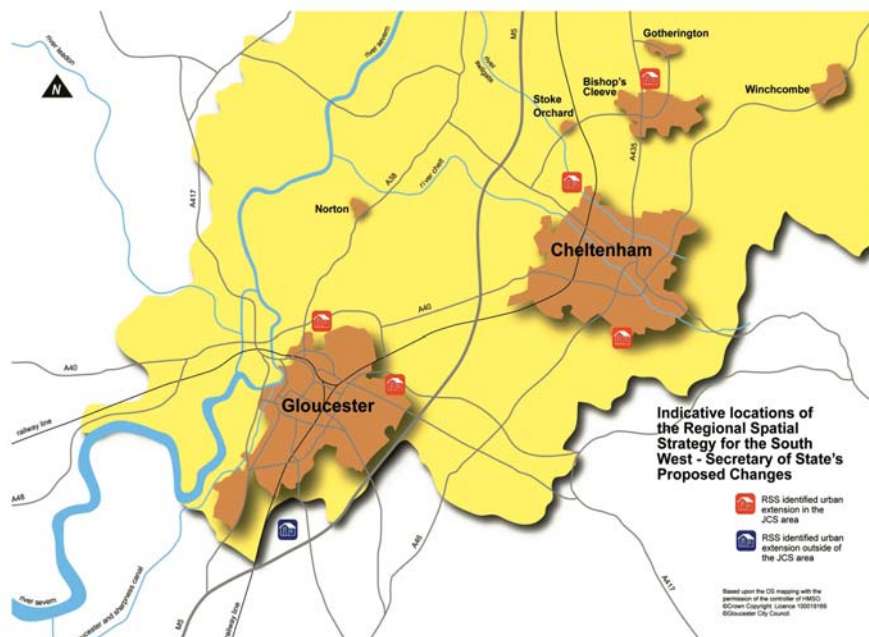
What does the Regional Spatial Strategy for the South West - Secretary of State's Proposed Changes propose for the Joint Core Strategy Area?

2.6. In the absence of a finalised Regional Spatial Strategy for the South West, Government advice is that local authorities should base their plans on the Secretary of State's Proposed Changes version published in July 2008.

2.7. The Draft Regional Spatial Strategy for the South West sets out draft policies on the development of the south west region; including policies on transport, infrastructure, community facilities, affordable housing, renewable energy, flooding, sustainability and gypsy and traveller accommodation.

2.8. To accommodate this development the Secretary of State's Proposed Changes sets out five areas of search for extensions to existing urban areas. These areas of search are mainly in Tewkesbury Borough but relate to the existing urban areas of Gloucester and Cheltenham; both of which are designated as Strategically Significant Cities and Towns in the Draft Regional Spatial Strategy. This relationship is one of the key reasons for working together on a Joint Core Strategy. Indicative locations for the proposed urban extension are illustrated on the diagram below.

Figure 2: Indicative locations of the Regional Spatial Strategy Areas of Search for the South West - Secretary of State's Proposed Changes



What is the three Councils' position on the Regional Spatial Strategy for the South West?

2.9. In 2008 the Councils of Gloucester City, Tewkesbury Borough and Cheltenham Borough decided to prepare the Joint Core Strategy. This will have many benefits to planning a sustainable future for all three Council areas.

2.10. This consultation document is the first stage in producing the Joint Core Strategy and has been prepared on the basis of the latest draft of the Regional Spatial Strategy called the Secretary of State's Proposed Changes. The Regional Spatial Strategy has still not been formally published, however, the Government advises that the Secretary of State's Proposed Changes should be used as a material planning consideration in the planning process when considering applications for proposals contained within it. The development industry, therefore, may not wait for the Government to publish the Regional Spatial Strategy for the South West and the Planning Inspectorate is likely to come under pressure to make decisions on planning appeals in advance of its publication. To some extent this has already occurred with appeals being granted for housing development at Bishops Cleeve and Longford (North Gloucester).

2.11. Gloucester City, Cheltenham Borough and Tewkesbury Borough Councils have various significant objections to key aspects of the Regional Spatial Strategy - Secretary of State's Proposed Changes, particularly in relation to what are considered unjustified urban extensions and unnecessary incursions into the Green Belt and countryside arising from its proposals for increased growth. Although the Councils remain opposed to the conclusions contained in the Regional Spatial Strategy, it is vital to put plans in place to help secure proper infrastructure should applications come forward for proposals within it.

2.12. It is also necessary, for the good planning of the area, to ensure that an up-to-date development plan is in place to guide future sustainable development and safeguard environmental, social, economic and other key interests.

2.13. In publishing this document the three Councils are inviting local communities and stakeholders to present their views and engage fully in the process of preparing the Joint Core Strategy.

3. Spatial Portrait and Issues

What is a Spatial Portrait?

3.1. The Joint Core Strategy will need to set a Vision for the future of the Joint Core Strategy area as it moves towards 2026. However, in order to produce a vision for the future, it is necessary to understand the past and present and the strengths and weaknesses of the area today. The Spatial Portrait should paint a picture of what it is like to live in the Joint Core Strategy area now and, in doing so, help identify the Key Issues facing the area and understand what is necessary to address them.

3.2. It is important that the Spatial Portrait provides an accurate snapshot of the Joint Core Strategy area. To help with this, a significant evidence base has been collated. This evidence base includes specialist studies into the economy of the area, its housing market, the leisure and retail industry, as well as technical studies on flood risk and the availability of land for housing and other uses. Added to these studies, the evidence base includes comprehensive statistics on social, economic and environmental issues.

3.3. By analysing these studies and statistics, an initial set of Key Issues have been identified. Your views are required on the Portrait. Do you recognise the issues it raises? Do you think it captures the character of the whole area and the differences between places within it?

3.4. Comments will be used to revise the Spatial Portrait and give a more detailed picture of what it is like to live in the area.

The Spatial Portrait

3.5. Gloucester City and Cheltenham Town together account for approximately 75% of the area's population and provide a focus for economic activity across the whole county. Individually, their similarity in terms of size and population means that they are equally important to the functioning of the area. However, due to their proximity to one another, in combination they are significant on a regional and national scale.

3.6. At a local level, the two settlements are considered to be very different in character. Gloucester dates back to Roman times and has a much longer history of habitation than Cheltenham. Its position on the River Severn at the point where the river becomes an estuary meant it was a strategically important place. Gloucester was a natural port and retains an important maritime heritage. Its docks and quay remain a focus for the City, with ship building and repairs taking place alongside dockside flats and an exciting new retail destination.

3.7. Away from the docks, Gloucester is dominated by its 11th Century Cathedral and there is further evidence of its early occupants in its Roman "gate" streets, historic central cross and medieval lanes. Although some of this heritage has been concealed

by modern developments, Gloucester's history is now emerging as having an important influence on its redevelopment.

3.8. Cheltenham, has a much shorter history. The town has a strong Regency heritage, attracting residents and visitors to its wide streets and Georgian architecture. Cheltenham's central conservation area is the largest such designation in Europe, reflecting the importance of what is considered to be the most complete Regency town in Britain. Cheltenham is also a garden town with a series of formal and semi-formal parks, gardens and green spaces, which gives its centre an open feel and plays host to numerous festivals and events.

3.9. Away from the city and town centres, both settlements have expanded greatly in the 19th and 20th centuries and both have become major urban areas and centres for employment, services, shops and education. Both settlements have a very high rate of self-sufficiency for employment, with almost 70% of their workforces living and working within the same local authority area. This is important as it results in fewer and shorter commutes and makes them both relatively sustainable in respect of journey times. Both have access to the M5 motorway which passes directly between them along with mainline railway with stations in both centres. Gloucestershire Airport also provides a hub for business travellers and some limited public services.

3.10. The differences between the two settlements are most apparent in their economies. Although both are important to the economy of Gloucestershire, their individual economies are very different and there remains a large gap in terms of earnings and general affluence. On average, earnings in Gloucester are 18% lower than those in Cheltenham, although this disparity is somewhat offset by the difference in house prices, with prices in Gloucester on average 27% lower than those in Cheltenham.

3.11. In terms of skills and qualifications there is a gap. In Cheltenham, almost 40% of the workforce is qualified to degree level or higher and only 8% have no qualifications. In Gloucester, however, only 23% of the workforce has a degree, although the percentage with no qualifications is similar.

3.12. While the two settlements of Gloucester and Cheltenham are relatively prosperous, there are still large disparities between different areas within them. Gloucester has five areas that are amongst the 10% most deprived in the country, while Cheltenham has two such areas. The city and town each have a further 17 and 10 areas amongst the 25% most deprived respectively. These pockets of deprivation demonstrate the inequalities that exist in both the city and the town.

3.13. In both Gloucester and Cheltenham the majority of jobs are in the public sector (including education and health), which accounts for over 30% of employment in both areas. Beyond this dominant sector, however, the two economies are distinctively different. Cheltenham's economy is concentrated within finance and in services such as hotels, retail and restaurants, with relatively low levels of manufacturing, construction, communications and distribution. Gloucester, by contrast, has a more balanced economy, with more employment in the manufacturing, construction and communications sectors and significantly less in the service industries and finance. The rural area which surrounds Cheltenham and Gloucester City also contains a

significant number of influential industries important to the economies of the two centres.

3.14. The recession has affected both settlements and unemployment has risen steadily from January 2008 and through 2009. The percentage of the population claiming Job Seekers Allowance reached 4.1% in Cheltenham and 4.6% in Gloucester in July 2009 from lows of 1.7% and 1.9%. In both settlements, there is a significantly higher percentage of male claimants.

3.15. In both settlements the importance of the service sector is rising. Cheltenham has developed a reputation as a retail destination and is ranked as the 23rd most important retail centre in the country, far higher than its population would suggest. Gloucester, despite having the slightly larger population, is ranked 89th but this does not take account of the very recently opened Gloucester Quays, which has significantly increased the City's retail offer and is rapidly becoming a destination for shoppers from Gloucestershire and beyond.

3.16. Although tourism is not as important to the economy of Cheltenham and Gloucester as it is to other areas of the South West, like Devon and Cornwall, it still provides jobs for 7.6% of the Cheltenham workforce and 5.6% of Gloucester's and is a potential area for growth. Gloucester, at present, struggles to attract overnight visitors. Hotel provision in the city centre is limited, meaning many visitors spend only a day in the City or leave in the evening to stay elsewhere.

3.17. Visitors who come to the area are very well catered for in terms of attractions. Gloucester's visitors come for the historic docks and Cathedral throughout the year, the successful rugby club during the season and for annual events like the Gloucester Festival and Tall Ships. In Cheltenham, tourists and day visitors come to take in the Regency heritage and grand buildings such as the Pittville Pump Room, enjoy a day at the Cheltenham's world famous race course or experience the Jazz, Literature, Science, Music and Cricket Festivals. Cheltenham has a good range of visitor accommodation including budget, boutique and luxury hotels and many popular B & Bs and guest houses.

3.18. Outside the major urban areas of Gloucester and Cheltenham, the Joint Core Strategy area contains a number of important settlements across Tewkesbury Borough. Of these settlements, Tewkesbury and Northway which fall, on both sides of junction 9 of the M5, are the largest and provide a focus for economic activity in the Borough. Bishops Cleeve and Woodmancote (to the north of Cheltenham) and Winchcombe (in the Cotswolds) are also important centres providing services for their own populations and large rural areas. Elsewhere, the built up areas of Brockworth, Churchdown, Innsworth and Longford look to Gloucester for services, while villages like Shurdington, Badgeworth and Uckington look to Cheltenham. Smaller villages and hamlets like Twyning, Norton, Snowhill, Stanton and Boddington dotted throughout Tewkesbury Borough, contain valuable local services like village schools, shops, pubs and community halls.

3.19. Tewkesbury itself is an important historic market town with a wealth of medieval features and timber framed buildings. The town centre is dominated by its distinctive Abbey overlooking the point at which the Rivers Severn and Avon meet, a sight made famous by coverage of the 2007 flood. The town centre is vibrant and contains a good

mix of shops and services, including many independent stores, and a popular market attracting locals and visitors alike.

3.20. Tewkesbury and neighbouring Northway, with its mainline railway station, are strategically positioned either side of Junction 9 of the M5 and are therefore attractive locations for business, especially storage and distribution. They, along with Bishop's Cleeve, provide a focus for a complex economy, which represents the Borough's unique position as a predominantly rural area wrapping around two large urban centres.

3.21. As in Cheltenham and Gloucester, the Public Sector is the largest employer but its dominance is lessened by a strong concentration of financial services jobs, primarily around Bishop's Cleeve.

3.22. Tourism also plays a role in the Tewkesbury Borough economy, with many visitors attracted to the Cotswolds Area of Outstanding Natural Beauty part of which is within the Borough. Tewkesbury with its impressive Abbey, the pretty town of Winchcombe and picturesque villages like Snowhill and Stanton are major tourist draws; so it is surprising that only 7.6% of the workforce is employed in tourism related work, well below the average of 9.2% for the South West.

3.23. Tewkesbury Borough does not have the same high rate of self-containment as its urban neighbours. Only 40% of the workforce lives and works within the Borough boundary, with many commuting in to Gloucester and Cheltenham, or outside the Joint Core Strategy Area to Worcester or Evesham.

3.24. The importance of Gloucester, Cheltenham and Tewkesbury/Northway to the Joint Core Strategy area should not obscure the fact that it is predominantly rural. Indeed, this is one of the most attractive features of the area and one of the reasons why its urban areas are attractive places to live and work.

3.25. The landscape of the Joint Core Strategy area is dominated by two major features. The River Severn and its tributaries have eroded soft Lias Clay to form the Severn and Avon Vales, while the harder limestone has remained forming the steep escarpment and uplands of the Cotswolds in the east of the area. Dotted around the Vale are the outliers of the escarpment such as Robinswood Hill and Chosen Hill and the smaller river terrace hillocks such as Hempsted and Lassington Hill.

3.26. The area is rich in biodiversity and supports a number of important habitats, such as lowland wet grassland, reedbeds, standing water, canals and rivers, traditional orchards, woodlands, wood pastures, limestone grasslands and beech woodlands. These habitats and important landscape features have resulted in the Joint Core Strategy area being heavily protected by a number of statutory designations. These include:

- 2 Special Areas of Conservation: Cotswolds Beechwood and Dixton Wood;
- Cotswolds Area of Outstanding Natural Beauty;
- 21 Sites of Special Scientific Interest;
- 9 Local Nature Reserves.

3.27. The areas location alongside the River Severn and beneath the Cotswolds escarpment makes it susceptible to flood risk. The flooding events of July 2007 brought Tewkesbury, in particular, and the wider Joint Core Strategy area to national attention. The flooding events highlighted the vulnerability of the area and the importance of maintaining means of access during flooding events, with areas of Tewkesbury town centre and other settlements becoming cut off by flood waters for several days. The upside of the presence of the Severn, Avon and the numerous related tributaries and other water courses that characterise the Joint Core Strategy area is the habitats that are associated with them, natural phenomena such as the Severn Bore and the opportunity for river related leisure activities.

3.28. Tewkesbury lies at the confluence of the Severn and Avon rivers. In combination, they and their tributaries drain a huge catchment area, including upland areas of Mid and North Wales, the Peak District and the Cotswolds. As a result Tewkesbury and Gloucester often experience peak flows some days after peak rainfall. By contrast, the eastern fringe of the Joint Core Strategy area is characterised by short and steep sided river valleys draining the Cotswolds escarpment. This landscape and the proximity of the escarpment, leads to rapid water run-off rates and can cause flash flooding. This was particularly evident in July 2007, when the River Chelt overtopped a 1 in 100 year flood alleviation scheme at Sandford Park and caused widespread flooding in Cheltenham town centre. Winchcombe and Tewkesbury town centres also suffer from flooding caused by rapid surface water run off.

3.29. Gloucester City is protected from the River Severn by extensive flood defences. However, smaller rivers and brooks draining into the main river can be subject to flooding and this is often made worse by high flows in the main river restricting the ability of smaller stream to discharge. The Sud and Whaddon Brooks were both identified as being at risk from this type of flooding.

Do you recognise the Portrait of the area? Is it representative of the place you live?

Please provide your comments; outlining any areas where you feel it should be amended or improved. Please also provide any further information or evidence on how you believe the Portrait could be amended to talk more specifically about where you live.

Key Issues

3.30. Using the Spatial Portrait and the evidence base, the following Key Issues have been identified for the Joint Core Strategy, which are not in order of importance.

1. There are significant areas of high environmental value throughout the Joint Core Strategy area. At present, restricted access to some of these areas and lack of funding for their management prevents them from being used by the general public, as well as limiting habitat creation and landscape enhancement.
2. The Joint Core Strategy area's population is predicted to expand. It is essential that self-sufficiency is maintained to avoid an increase in commuting. This will be particularly important in the creation of new communities.

3. The future development of the Joint Core Strategy area should seek to reduce carbon emissions and secure viable initiatives for the generation of renewable energy.
4. New homes will need to satisfy the demands of the current and future population to support greater economic prosperity and address housing affordability.
5. There is a high degree of inequality across the Joint Core Strategy area. Some locations currently experience significant economic deprivation and there is a high degree of inequality in wages and skills both between and within settlements.
6. There is a limited supply of employment land within the urban areas to meet the needs of the Joint Core Strategy area for continued economic growth.
7. The area must capitalise upon its unique range of tourism features in order to increase the visitor numbers to the area and generate more income from tourism.
8. There is a need for more visitor accommodation across the area to encourage visitors to the area to stay for longer.
9. The individual settlements that make up the Joint Core Strategy area need to work together to compete more effectively at a regional and national level.
10. The Joint Core Strategy area contains a wealth of built and natural heritage that is in need of protection and enhancement. This is an asset that should be developed to help regenerate the area and attract visitors.
11. The area suffers from significant flood risk. In particular, a number of communities and key pieces of infrastructure within the Joint Core Strategy area can become inaccessible and isolated during flood events.
12. It is important that the urban regeneration initiatives of both Gloucester and Cheltenham are realised to make sure that the city and town centres remain attractive places to live and work. Tewkesbury town centre is also in need of enhancement that reflects its unique character.
13. The success of sustainable communities within the Joint Core Strategy area is dependent upon the provision of appropriate health and community infrastructure.
14. There is a need to improve important transport links to other regions, such as the A417/419 (missing link) and the redoubling of the railway link between Swindon and Kemble along with improving transport links between Gloucester, Cheltenham and Tewkesbury.

3.31. It is essential that the Joint Core Strategy process refines these issues and relates them to specific places within the Joint Core Strategy area before it seeks to address them as part of a development strategy.

Are the above issues the right ones for the Joint Core Strategy to tackle? How do they relate to the place where you live?

4. Vision and Objectives

4.1. This part of the document deals with the future of the Joint Core Strategy area and how the strategy could deal with the Key Issues set out previously. The first stage of this process is to outline a possible Vision for the area in 2026.

Why is the Vision important?

4.2. It is essential that the Joint Core Strategy is based on a clear Vision setting out how the area will look in the year 2026. The Vision for the Joint Core Strategy has been informed by the Sustainable Community Strategy for each of the authorities and the Local Strategic Partnership Visioning Workshop held in 2008.

4.3. The Vision for the Joint Core Strategy will evolve over the course of the preparation of the document. The Vision will need to include or consider elements identified through the Local Strategic Partnership Stakeholder Workshop, the evidence base and the Key Issues arising from the Spatial Portrait.

What is the Vision for the Joint Core Strategy area?

4.4. By 2026 the city and towns of the Joint Core Strategy area will be regenerated and will have grown to create a thriving sub-region of self-reliant and interlinked communities that complement one another.

4.5. The vision will set out how City and Town Centres of Gloucester, Cheltenham and Tewkesbury will have undergone major regeneration and their vitality and viability will have been significantly enhanced, strengthening their role as the focus for employment, leisure and tourism. In Gloucester City, the Gloucester Heritage Urban Regeneration Company (GHURC) in partnership with the Council will have brought forward a number of key development sites by 2016 inspired by the City's unique historic character and building on the success of Gloucester Quays, attracting people and businesses back to the city centre. People will be able to walk or cycle safely around the City Centre and neighbourhoods linked to an efficient public transport system that will provide rapid access from the suburbs to a revamped bus station adjoining a revitalised King's Square.

4.6. Civic Pride, in Cheltenham, will have been successful in intensifying the use of underused Town Centre sites like North Place and Royal Well and in redeveloping existing iconic buildings such as the Municipal Offices. Civic Pride will also have integrated peripheral parts of the town centre like the Lower High Street and The Brewery to the Central Promenade and it will be possible to walk all the way from North Place to Montpellier along a central regency boulevard.

4.7. In relation to Tewkesbury the vision will set out how the Town Centre will need to retain its medieval character whilst allowing for some sensitive redevelopment of key sites.

4.8. The Vision will also need to consider the scale and manner in which urban extensions may come forward and how they could create attractive and sustainable places to live.

4.9. The Vision will need to set out how all development, be it in regenerated centres or new urban areas, will minimise its contribution to climate change and maximise the use of renewable energy sources, passive solar gain and natural ventilation. It will also have to set out the manner in which flood risk and water management is addressed.

4.10. It is also important that the Vision sets out how the provision of new homes will have met the needs and demands of the community by providing the required mix and balance of both affordable and market houses. The design and quality of new homes will also need to encourage opportunities for home working and enable the right type of accommodation to be provided in the right location. The Vision will also have to consider the needs of an ageing population.

4.11. The provision of new homes across the Joint Core Strategy area will need to be balanced by a step-change in employment provision and opportunities to maintain historically high rates of self-containment and reduce dependency on the private car. The regeneration of Gloucester, Cheltenham and Tewkesbury will also need to focus on making them attractive and exciting places to set up business, with opportunities in the service sector as well as traditional industries.

It is important that the Vision emerges from this consultation process, and describes clearly how the various locations within the Joint Core Strategy area will have changed or stayed the same.

How would you like to see the Vision express the things that are important to you and the places within Joint Core Strategy area that you are interested in?

Do you think there should be separate Vision statements for particular locations within the Joint Core Strategy? If so what would you like these to say?

Strategic Objectives

4.12. In order to achieve the Vision the Joint Core Strategy will need to set objectives that will guide the future development of the area.

4.13. These are set out below as Strategic Objectives:

1. To mitigate contributions to the causes of climate change and ensure effective adaptations are developed to improve the resilience of the Joint Core Strategy area to the impact of climate change.
2. To reduce the risk of flooding and its impact, particularly by reducing the likelihood of communities and key infrastructure becoming inaccessible during flood events.
3. 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.
4. To protect, manage and enhance biodiversity, the natural environment and formal/informal recreation through the development of a Green Infrastructure Strategy and the potential idea of a Regional Park. In particular, to increase the value and accessibility of the Joint Core Strategy area's environment for the benefit of the natural environment and the improved health and well being of the Joint Core Strategy area's population.
 5. To build on the current high levels of self-reliance in respect of employment within the Joint Core Strategy area by encouraging employment sectors that are already strong within the area and attracting additional sectors that will help retain and attract skilled workers.
 6. To develop the skills of people of all ages to match the future employment opportunities within the Joint Core Strategy area and seek to retain a higher proportion of graduates.
 7. To effectively encourage regeneration that makes the best use of the Gloucester Heritage Urban Regeneration Company and Cheltenham's Civic Pride sites and the medieval heritage of Tewkesbury.
 8. To facilitate access to and improve healthcare and community facilities.
 9. To deliver effective solutions for transport, planning and urban design to reduce the dependency upon the private car and improve the links between settlements so they can complement one another.
 10. To realise regeneration aspirations and to establish the Joint Core Strategy area as a single attraction that caters for a diverse range of retail, cultural, educational, leisure and tourism needs by capitalising on the unique strengths of each settlement.
 11. To ensure that development protects, preserves and enhances the important historic environment and the distinctive townscape qualities of the Joint Core Strategy area, including protection of key views and accessibility of historic locations throughout the Joint Core Strategy area.
 12. To maintain and build upon the existing tourism economy of the Joint Core Strategy area by improving accessibility to existing attractions, encouraging the development of new attractions in accessible locations and by providing services to facilitate growth in the tourism industry.
 13. To promote self-reliant communities by maintaining, enhancing and developing local and district shopping centres that provide for the day-to-day shopping and community service needs of the local population and promoting appropriate development that supports their function.

Do you consider that these are the right Strategic Objectives for the Joint Core Strategy?

How can they be refined to address more specifically the places of interest to you?

5. Strategic Spatial Policy Areas

Development in the JCS Area

Informing the Joint Core Strategy

5.1. This section of the document introduces the strategic policy areas that the Joint Core Strategy will need to address. For each area there is a brief description of the policy context at a national and regional level and an explanation of how this translates locally. This is followed by an outline of what needs to be considered within that policy area and a set of potential outcomes. Each section concludes by asking for your views on how the policy area could be tackled.

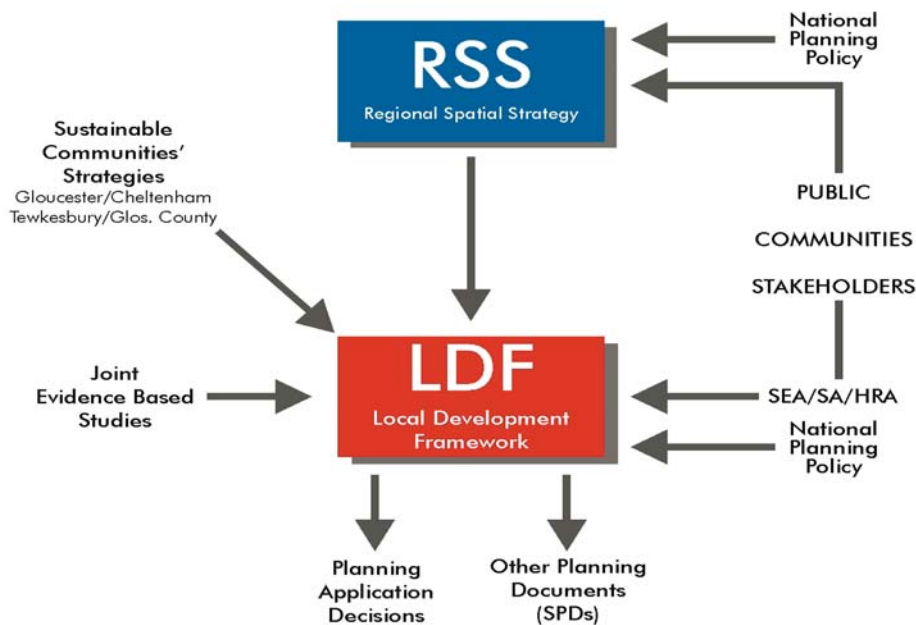
5.2. The Joint Core Strategy will eventually sit in the middle of a hierarchy of plans that will set out the parameters for development in the area covered by the three Councils. It will provide the strategic level policy for the area (taking account of the Regional Spatial Strategy when it is published) and will form the main part of each Council's Local Development Framework. All subsequent Local Development Framework documents will need to be in conformity with the Joint Core Strategy.

5.3. In addition to the Regional Spatial Strategy there are a number of other influences that play their part in the preparation of the final Joint Core Strategy. These may be summarised as:-

- National Planning Policies set out in government circulars regulations and policy statements
- The Evidence Base, comprising data and spatial analysis of the situation at present in the Joint Core Strategy area
- Local priorities determined by consultation with stakeholders and the wider general public
- Sustainable Community Strategies prepared by the Local Strategic Partnerships

5.4. The three local authorities' Sustainable Community Strategies set out the vision each authority has for the development of their local area. The Joint Core Strategy must be mindful of these visions in the course of its preparation.

Influences on the Joint Core Strategy



Regional Spatial Strategy

5.5. The Regional Spatial Strategy remains of importance to the production of the Core Strategy and will set out the level of housing and employment provision needed for each area of the South West up to the year 2026.

5.6. The Draft Regional Spatial Strategy was published in April 2006 and the Examination in Public of the document commenced a year later in April 2007. In July 2008, the Secretary of State published the Proposed Changes following receipt of the Panel's Report. The document represents the most up to date thinking about the Regional Strategy but the final version of the Regional Spatial Strategy remains as yet unpublished. The provision set out in the Proposed Modifications form the basis of this participation document, but this should neither imply acceptance or agreement with these provisions by the constituent authorities in the Joint Core Strategy area.

5.7. Acknowledging the contentious nature of the emerging Regional Spatial Strategy growth proposals, the housing figures contained within it comprise:

- 34,200 additional dwellings to be provided for in the Joint Core Strategy area up to 2026. 11,500 of these to be in Gloucester, 8,100 in Cheltenham and 14,600 in Tewkesbury Borough
- 5 possible Urban Extensions in the area to provide up to 11,300 of the total housing set out above
- 11,700 new jobs in the Gloucester Travel to Work Area and additional 79 hectares of employment land 10,700 new jobs to be provided for the Cheltenham Travel to Work Area and 39 hectares of additional employment land to be provided.

5.8. The Regional Spatial Strategy Proposed Changes also includes a possible urban extension to the south of Gloucester City, mostly within the district of Stroud. This is not part of the Joint Core Strategy but will be addressed jointly with Stroud District Council should it be retained within the eventual published of the Regional Spatial Strategy.

Flexibility

5.9. Whatever the final provisions are of the Regional Spatial Strategy they remain a snapshot of what is thought likely to be required over nearly 20 years. Both the Regional Spatial Strategy and Joint Core Strategy when adopted will be constantly reviewed and monitored and changes made as circumstances change.

Gloucester City Urban Area

National Policy Context

5.10. The following national planning policy documents need to be considered in developing this policy area:-

- Planning Policy Statement 1: Planning Sustainable Development
- Supplement to Planning Policy Statement 1: Planning and Climate Change
- Planning Policy Statement 3: Housing
- Planning Policy Statement 6: Planning for Town Centres
- Draft Planning Policy Statement 4: Planning for Sustainable Economic Development

Regional Planning Context

- CSS: The Core Spatial Strategy
- Development Policy A: Development at Strategically Significant Cities and Towns
- HMA3: Gloucester and Cheltenham HMA
- ES1: Sustainable Economic Prosperity
- ES2: Providing for Employment land and Premises
- ES3: Review of Employment Sites

What are the implications of the Regional Spatial Strategy for the South West - Secretary of State's Proposed Changes?

5.11. Gloucester is identified in Draft Development Policy A of the Regional Spatial Strategy as a Strategically Significant City or Town. Towns and Cities have been identified as strategically significant due to the crucial role they play in the region as focal points for housing, employment, shops, services, facilities and public transport provision. The Regional Spatial Strategy identifies locations for development in and around Gloucester recognising that the urban area of Gloucester cannot itself accommodate entirely the needs and demands for homes and jobs within the City.

5.12. While the Regional Spatial Strategy identifies a number of areas to accommodate the future expansion of the City, it also sets out a separate requirement of 11,500 new homes to be provided within the existing urban area by 2026. However, as this requirement began in 2006, an amount of this housing will either have already been built over the past three years or will already have been granted planning permission.

5.13. It is acknowledged that Gloucester has been underperforming economically in relation to the rest of the South West for a number of years and that economic performance needs to be improved if it is to compete with other cities and towns in the region and beyond. To tackle this the Regional Spatial Strategy proposes that 11,700 new jobs be provided across the Gloucester City Travel to Work Area. The Joint Core Strategy will need to develop a strategy that allows the City to grow economically and reach its potential.

Local issues affecting this policy area

5.14. The following Key Issues (see Spatial Portrait and Issues) and Strategic Objectives (see Vision and Objectives) are particularly relevant to this policy area.

Key Issues: 4 / 5 / 6 / 9 / 12 / 13 / 14

Strategic Objectives: 3 / 5 / 7 / 11

Commentary

5.15. As set out above, the Regional Spatial Strategy states that 11,500 new homes should be provided within Gloucester City's existing urban area by 2026. Whilst the Joint Core Strategy will not allocate specific sites for all of the development required, it will need to outline a strategy for how this development will be delivered.

5.16. Primarily the Joint Core Strategy will need to consider where this new development could be accommodated. One key factor in the delivery of some of the City's requirement for homes and jobs is the Gloucester Heritage Urban Regeneration Company, which was established in 2004. Its 'area of influence' is known as the 'Central Area' and includes a significant amount of brownfield (previously developed) land within the City. Your views on how the Joint Core Strategy should assist urban regeneration are sought in the Urban Regeneration Section of this document.

5.17. Early evidence informing the Joint Core Strategy indicates that the City is likely to be able to accommodate its housing requirement within its administrative boundary. However, consideration needs to be given to the challenge of achieving this and what this would mean for the City. Consideration needs to be given to the significance of not meeting the requirement. Many of the sites located within the Gloucester Heritage Urban Regeneration Company's 'area of influence' are complex sites to develop. They have a variety of constraints, such as contaminated land, or poor accessibility, that make them difficult to bring forward for development. Failing to deliver these sites could have an adverse impact on the City being able to achieve its housing requirement.

5.18. The approach to the areas proposed for development outside of the Gloucester's existing urban area are discussed in the Sustainable Urban Extensions section of this document. This consultation is seeking your views on the how the current requirement for development within existing urban area could be achieved in the City.

Things to consider	Outcomes
The Joint Core Strategy could maximise the amount of housing provided on urban sites by requiring increased densities.	High density development may provide the opportunity to increase the number of homes provided within the urban area. However, it may not provide the right type and range of housing required to meet peoples needs. This may affect the deliverability of a number of city centre urban sites.
Where the City cannot provide enough deliverable sites to meet its housing requirement it should seek to provide them as close to the City as possible.	This could result in an element of the City's housing requirement being provided within the urban extensions proposed on the edge of the City.
The Joint Core Strategy could identify areas or sites within the City where higher densities may be appropriate.	Development could primarily be concentrated in the city centre, with some additional appropriate peripheral sites identified.

How do you think the City can best accommodate future development?

Sustainability Impact

5.19. You may want to consider the following Sustainability Objectives (See <http://www.gct-jcs.org/SustainabilityAppraisal/Home.aspx>) when responding to questions on this policy area: 2, 7, 8, 10, 11, 14 and 15

Cheltenham Urban Area

National Policy Context

5.20. The following national planning policy documents need to be considered in developing this policy area:-

- Planning Policy Statement 1: Planning Sustainable Development
- Supplement to Planning Policy Statement 1: Planning and Climate Change
- Planning Policy Statement 3: Housing
- Planning Policy Statement 6: Planning for Town Centres
- Draft Planning Policy Statement 4: Planning for Sustainable Economic Development

Regional Planning Context

- CSS: The Core Spatial Strategy
- Development Policy A: Development at Strategically Significant Cities and Towns
- HMA3: Gloucester and Cheltenham HMA
- ES1: Sustainable Economic Prosperity
- ES2: Providing for Employment land and Premises
- ES3: Review of Employment Sites

What are the implications of the Regional Spatial Strategy for the South West - Secretary of State's Proposed Changes?

5.21. Cheltenham is identified in Draft Development Policy A of the Regional Spatial Strategy as a Strategically Significant City or Town. Towns and Cities have been identified as strategically significant due to the crucial role they play in the region as focal points for housing, employment, shops, services, facilities and public transport provision. The Regional Spatial Strategy identifies locations for development in and around Cheltenham recognising that the urban area cannot itself entirely accommodate the needs and demands for homes and jobs.

5.22. The Regional Spatial Strategy identifies a number of areas around Cheltenham, mainly in Tewkesbury Borough, that it proposes should accommodate future growth in urban extensions. In addition, it identifies a separate requirement of 6,500 new homes to be provided within the existing urban area of Cheltenham by 2026. However, as this requirement began in 2006, an amount of this housing will either already have been built over the past three years or will already have been granted planning permission.

5.23. In addition to housing requirements, it is acknowledged that Cheltenham needs to compete economically with other cities and towns in the region and beyond. Regional Spatial Strategy proposes that 10,750 jobs be provided across the Cheltenham Travel to Work Area. The Joint Core Strategy will need to develop a strategy that allows Cheltenham to grow economically in a sustainable way.

5.24. The approach to the areas proposed for development outside Cheltenham's existing urban area are discussed in the Sustainable Urban Extensions section of this document. This section seeks your views on how Cheltenham can accommodate development within the existing urban area.

Local issues affecting this policy area

5.25. The following Key Issues (see Spatial Portrait and Issues) and Strategic Objectives (see Vision and Objectives) are particularly relevant to this policy area.

Key Issues: 4 / 5 / 6 / 9 / 12 / 13 / 14

Strategic Objectives: 3 / 5 / 7 / 11

Commentary

5.26. As set out previously, the Regional Spatial Strategy states that 6,500 new homes should be provided within Cheltenham's existing urban area by 2026. Whilst the Joint Core Strategy will not allocate specific sites for all of the development required, it will need to outline a strategy for how this development will be delivered.

5.27. Historically Cheltenham has been seen as an attractive place to live and work with a good quality of life and areas of high architectural worth. Cheltenham town centre is renowned for its high quality retail options and has historically performed significantly better than its population should suggest. It is recognised that Cheltenham needs to continue to move forward to maintain its position as an important retail centre and retain the town's economic prosperity. Housing and employment provision still remain a priority for the town and there is a particular need to provide higher levels of affordable housing.

5.28. The "Civic Pride" programme was launched with the aim of regenerating and improving the viability of a number of key town centre sites and improving the vitality and attractiveness of the town centre as a whole. Civic Pride is also likely to assist in providing some of the new homes and employment proposed for the town. Your views on the how the Joint Core Strategy should assist urban regeneration are sought in the Urban Regeneration Section of this document.

5.29. In this section we are seeking your views on how the current requirement for development could be achieved in the town.

Things to consider	Outcome
The Joint Core Strategy could maximise the amount of housing provided on urban sites by requiring increased densities.	High density development may provide the opportunity to increase the number of homes provided within the urban area. However, it may not provide the right type and range of housing required to meet peoples needs. This may affect the deliverability of a number of town centre urban sites. High density development may not be appropriate in some areas of the Borough.
It may not be possible to identify sufficient sites within the urban area to meet the housing requirements. Should the Joint Core Strategy seek to provide them as close to the urban area as possible.	This could result in an element of Cheltenham's housing requirement needing to be found on the periphery of the urban areas, in the countryside or within urban extensions.
The Joint Core Strategy could identify areas or specific sites within Cheltenham where more intensive development or higher densities may be appropriate.	Development could primarily be concentrated in the town centre, with some additional appropriate peripheral sites identified.
The Joint Core Strategy could identify sites within the Cheltenham Green Belt.	Within Cheltenham Borough there are areas designated as Green Belt. Should development be permitted in these areas to reduce pressure on the urban area?

How do you think Cheltenham can best accommodate future development?

Sustainability Impact

5.30. You may want to consider the following Sustainability Objectives (See <http://www.gct-jcs.org/SustainabilityAppraisal/Home.aspx>) when responding to questions on this policy area: 2, 7, 8, 10, 11, 14 and 15

Tewkesbury Borough

National Policy Context

5.31. The following national planning policy documents need to be considered in developing this policy area:-

- Planning Policy Statement 1: Planning Sustainable Development
- Supplement to Planning Policy Statement 1: Planning and Climate Change
- Planning Policy Statement 3: Housing
- Draft Planning Policy Statement 4: Planning for Sustainable Economic Development
- Planning Policy Statement 6: Planning for Town Centres
- Planning Policy Statement 7: Sustainable Development in Rural Areas
- Planning Policy Statement 25: Development and Flood Risk

Regional Planning Context

- CSS: The Core Spatial Strategy
- Development Policy A: Development at Strategically Significant Cities and Towns
- Development Policy B: Development at Market Towns
- Development Policy C: Development at Small Towns and Villages
- HMA3: Gloucester and Cheltenham HMA
- ES1: Sustainable Economic Prosperity
- ES2: Providing for Employment land and Premises
- ES3: Review of Employment Sites

What are the implications of the Regional Spatial Strategy for the South West - Secretary of State's Proposed Changes?

5.32. The Regional Spatial Strategy proposes that 14,600 new homes and a significant number of new jobs should be provided in Tewkesbury Borough by 2026. To accommodate the majority of this growth it proposes five urban extensions to Cheltenham and Gloucester primarily within Tewkesbury Borough.

5.33. In addition to the urban extensions, it is proposed that 2,900 new homes should be provided across Tewkesbury Borough outside the urban extensions. However, as this requirement began in 2006, an amount of this housing will either already have been built over the past three years or will already have been granted planning permission.

Local issues affecting this policy area

5.34. The following Key Issues (see Spatial Portrait and Issues) and Strategic Objectives (see Vision and Objectives) are particularly relevant to this policy area.

Key Issues: 1 / 2 / 5 / 9 / 11 / 12 / 14

Strategic Objectives: 3 / 5 / 7 / 11

Commentary

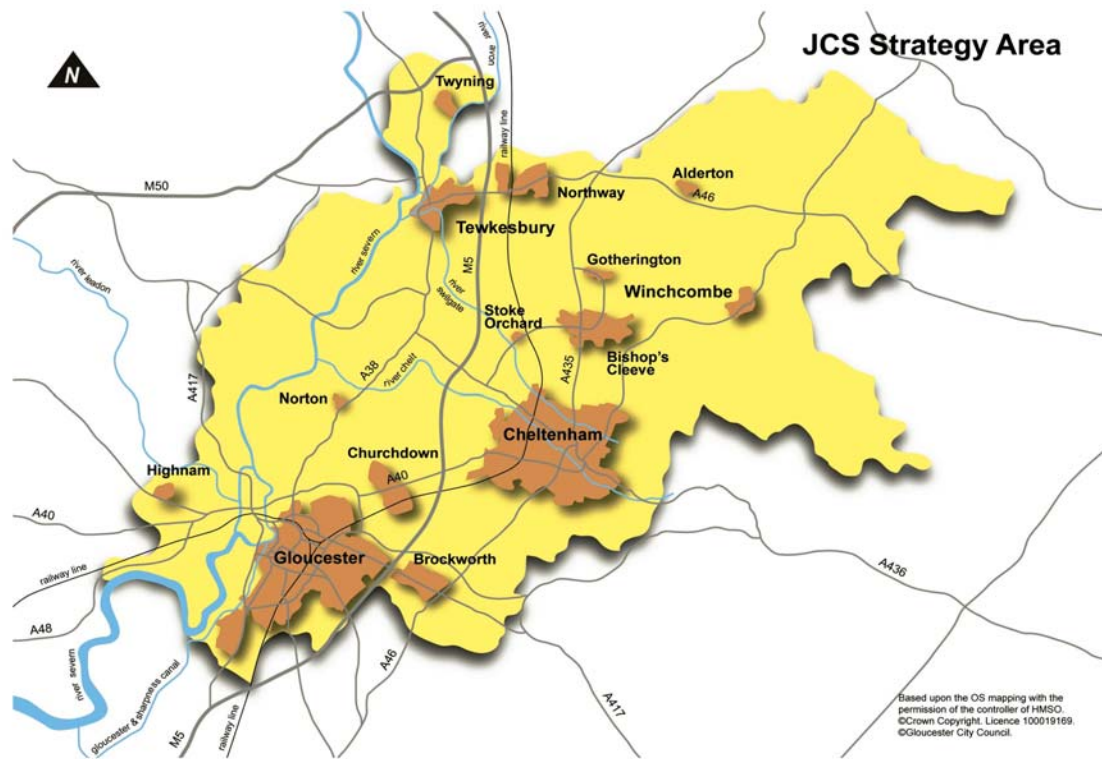
5.35. The Regional Spatial Strategy sets out that 2,900 new homes should be provided across Tewkesbury Borough outside proposed urban extensions by 2026. Tewkesbury Borough will also have to supply significant levels of employment land to support the economy of the Joint Core Strategy area. Whilst the Joint Core Strategy will not in itself allocate specific sites for all development, it is critical that it includes a strategy that can deliver this development.

5.36. Within the Borough, Tewkesbury is an important market town that together with the adjacent built up area of Northway is identified as the Borough's principle settlement and has a good range of services including community facilities and shops. One option to accommodate future development would be to identify Tewkesbury/Northway as an area for growth. Another option could be to identify Tewkesbury/Northway and Winchcome (a market town with a high level of community facilities) as areas for growth.

5.37. The approach to the areas proposed for urban extensions is discussed in the Sustainable Urban Extensions section of this document. This section seeks your views on how Tewkesbury Borough can accommodate development outside the urban extensions.

Things to consider	Outcome
The Joint Core Strategy could identify Tewkesbury/Northway as the area for growth.	All growth would be concentrated adjacent to the built up area of Tewkesbury/Northway. Smaller settlements may not have the opportunity for limited growth to help maintain services.
The Joint Core Strategy could identify Tewkesbury/Northway and Winchcombe as areas for growth.	All growth would be concentrated adjacent to the built up areas of Tewkesbury/Northway and Winchcombe. Smaller settlements may not have the opportunity for limited growth to help maintain services.

Figure 3: Joint Core Strategy Area



Looking at the table and alternatives above, do you have any views on where development should be focussed?

Do you think there are any alternatives that have not been considered? If so, what are they?

Sustainability Impact

5.38. You may want to consider the following Sustainability Objectives (See <http://www.gct-jcs.org/SustainabilityAppraisal/Home.aspx>) when responding to questions on this policy area: 2, 6, 7, 8, 10, 11 and 15

Sustainable Urban Extensions

National Policy Context

5.39. The following national planning policy documents need to be considered in developing this policy area:-

- Planning Policy Statement 1: Planning Sustainable Development
- Supplement to Planning Policy Statement 1: Planning and Climate Change
- Planning Policy Guidance Note 2: Green Belts
- Planning Policy Statement 3: Housing
- Draft Planning Policy Statement 4: Planning for Sustainable Economic Development
- Planning Policy Statement 6: Planning for Town Centres
- Planning Policy Statement 7: Sustainable Development in Rural Areas

Regional Planning Context

- CSS: The Core Spatial Strategy
- Development Policy A: Development at Strategically Significant Cities and Towns
- HMA3: Gloucester and Cheltenham HMA
- ES1: Sustainable Economic Prosperity
- ES2: Providing for Employment land and Premises
- ES3: Review of Employment Sites

What are the implications of the Regional Spatial Strategy for the South West - Secretary of State's Proposed Changes?

5.40. The Regional Spatial Strategy proposes that the Gloucestershire Green Belt should continue to maintain the separate identities of Cheltenham and Gloucester. However, the Spatial Strategy considers that the requirement for new homes in both settlements and the need to provide additional jobs means that this need cannot be met solely within the existing urban areas.

5.41. The Regional Spatial Strategy considers that the most sustainable solution is to develop extensions to existing urban areas (Sustainable Urban Extensions). As a result, it identifies five "areas of search" for urban extensions within the Joint Core Strategy area. The five areas are represented diagrammatically but they can be broadly defined as:-

1. North of Gloucester (around Longford/Innsworth)
2. North West of Cheltenham (around Swindon Village/Uckington)
3. South of Cheltenham (around Shurdington/Leckhampton - including land formerly known as "white land")
4. North of Bishops Cleeve
5. Land North of Brockworth (east of Gloucester)

5.42. The original draft of the Regional Spatial Strategy proposed only two areas of search, namely those at North West of Cheltenham and North of Gloucester. The

remaining three areas of search were added after the Examination in Public by the Secretary of State in her Proposed Changes.

5.43. If the Regional Spatial Strategy is published it will ultimately be for the Joint Core Strategy to more precisely define the boundaries of these urban extensions and to set out policies for the design and development of these areas; including infrastructure provision and phasing. The precise number of urban extensions required and the level of development they will be expected to accommodate will be dependant upon the final publication of the Regional Spatial Strategy. However, the three Council's reiterate their objection to the contents of the most recent version of the Regional Spatial Strategy.

Local issues affecting this policy area

5.44. The following Key Issues (see Spatial Portrait and Issues) and Strategic Objectives (see Vision and Objectives) are particularly relevant to this policy area.

Key Issues: 1 / 2 / 4 / 5 / 6 / 9 / 11 / 13 / 14

Strategic Objectives: 3 / 4 / 5 / 7 / 8 / 9 / 13

Commentary

5.45. It is possible at this stage; based on the most recent version of the Regional Spatial Strategy to assess the potential development capacity of each of the urban extensions and to give a general indication of what associated facilities they could accommodate. Three of the proposed "areas of search" are partially located within existing Green Belt (North West of Cheltenham, North of Gloucester and South of Cheltenham) and there is an expectation in the Draft Regional Spatial Strategy that Green Belt boundaries would have to be redrawn to accommodate the development proposed in these areas.

5.46. All the proposed urban extensions potentially have detailed development issues that would need to be satisfactorily addressed before they could be developed; these include matters such as transport and accessibility, landscaping, detailed design guidance, flood risk assessment, habitat protection and many other considerations that accompany any new development. At this stage, however, the focus of this consultation is to get views on the fundamental principles associated with the possible development of urban extensions if the Regional Spatial Strategy is published in accordance with the Secretary of State's Proposed Changes.

5.47. Below is a brief summary of each of the five urban extensions proposed by the Regional Spatial Strategy for the South West - Secretary of State's Proposed Changes:-

1. North of Gloucester

- Development of this area would require an alteration to the Green Belt boundary.

- This area of search was included in both the Draft Regional Spatial Strategy for the South West and in the Secretary of State's Proposed Changes. It is expected to accommodate up to 2,500 new homes.
- If 2,500 new homes are built in this area, it may also need to accommodate approximately 10 hectares of land for open space, 3 hectares of land for educational uses, 5.5 hectares of employment land and nearly 3.5 hectares of land for community facilities. Around 3.5 hectares would be required for additional infrastructure needs.

2. North West of Cheltenham

- Development of this area would require an alteration to the Green Belt boundary.
- This area of search was included in both the Draft Regional Spatial Strategy for the South West and in the Secretary of State's Proposed Changes. Initially it was expected to accommodate 4,000 new homes but the Secretary of State proposed that this should increase to 5,000.
- If 5,000 new homes are built in this area, it may also need to accommodate approximately 11 hectares of employment land, 20 hectares of open space, in excess of 14 hectares for educational uses and over 6.5 hectares for community facilities. Around 7.5 hectares would be required for additional infrastructure needs.

3. South of Cheltenham

- Development of this area may require an alteration to the Green Belt boundary.
- This area of search was not included in the Draft Regional Spatial Strategy for the South West but was introduced by the Secretary of State's Proposed Changes with a capacity of around 1,300 new homes.
- If 1,300 new homes are built in this area, it may also need to accommodate over 5 hectares of open space, 1.6 hectares for educational uses, nearly 3 hectares of employment land and 1.75 hectares for community facilities. Around 1.9 hectares would be required for additional infrastructure needs.

4. North of Bishops Cleeve

- This area of search was not included in the Draft Regional Spatial Strategy for the South West but was introduced by the Secretary of State's Proposed Changes with a capacity of around 1,000 new homes.
- If 1,000 new homes are built in this area, it may also need to accommodate over 1 hectare for educational uses, 2.2 hectares of employment land and 1.35 hectares for community facilities. Around 1.5 hectares would be required for additional infrastructure needs.

5. Land North of Brockworth

- Development of this area may require an alteration to the Green Belt boundary.
- This area of search was not included in the Draft Regional Spatial Strategy for the South West but was introduced by the Secretary of State's Proposed Changes with a capacity of up to 1,500 new homes.
- If 1,500 new homes are built in this area, it may also need to accommodate almost 6 hectares of open space, 2 hectares for educational uses, 3.3 hectares of employment land and over 2 hectares for community facilities. Around 2 hectares would be required for additional infrastructure needs.

Urban Extensions and Sustainability

5.48. The potential urban extensions outlined above are seen, by the latest version of the Regional Spatial Strategy, as being the most sustainable option to accommodate additional housing growth outside of the existing urban areas. The paragraphs above give approximate theoretical calculations of the land required in each of the areas of search to accommodate some of the more basic components of sustainable living. This does not mean that all of these components will necessarily be provided in all of the urban extensions. Some of these areas, because of their relative size and relationship to existing urban areas, may be more sustainable if the majority of these facilities are provided within the urban extension. Other areas may be located close to existing community facilities or centres of employment and in those instances the most sustainable solution may be to utilise existing facilities rather than trying to provide them all within the urban extension. All urban extensions would need to provide a substantial element of affordable housing.

5.49. If the Regional Spatial Strategy is finalised and published, the Joint Core Strategy will need to ensure that all urban extensions are delivered in the most sustainable way possible. This consultation seeks your views on how this could be achieved and what facilities you feel should be provided at urban extensions to ensure that they are sustainable.

Things to consider	Outcomes
Should Sustainable Urban Extensions be self sufficient and seek to meet all of their own needs such as shops community facilities and schools?	Such facilities may not always be provided at the beginning of development and may only be provided as development progresses. In some instances the amount of development proposed may be too small to justify provision or provide a sufficient range of facilities and adjoining urban areas might provide such facilities more effectively.
Should employment opportunities be provided in Sustainable Urban Extensions in proportion to their potential population?	One principle of sustainable living is to try to reduce the number and length of journeys to work. It may be desirable to provide employment opportunities at urban extensions so that residents have the choice to live close to their work. However, smaller urban extensions may not be able to provide a sufficient range of employment opportunities for this to be realistic.

What role do you think Sustainable Urban Extensions should play within the wider Joint Core Strategy area?

Sustainability Impact

5.50. You may want to consider the following Sustainability Objectives (See <http://www.gct-jcs.org/SustainabilityAppraisal/Home.aspx>) when responding to questions on this policy area: 2, 6, 7, 8, 10, 11, 14, 15 and 17

Priorities for Delivery Through Development

National Policy Context

5.51. The following national planning policy document needs to be considered in developing this policy area:-

- Planning Policy Statement 1: Planning Sustainable Development

What are the implications of National Policy?

5.52. National Planning Policy Statement 1: Delivering Sustainable Development sets out the Government's commitment to developing strong, vibrant and sustainable communities. It requires development plans to carefully consider the relationship between social inclusion, protecting and enhancing the environment, the prudent use of natural resources and economic development when formulating planning policy. It advises that this should be done by bringing together and integrating policies for the development of land with other plan, policies and programmes that influence the nature of places and how they can function.

Regional Planning Context

- CSS: The Core Spatial Strategy
- Development Policy A: Development at Strategically Significant Cities and Towns
- Development Policy B: Development at Market Towns
- Development Policy C: Development in Small Towns and Villages
- Development Policy D: Infrastructure for Developments

What are the implications of the Regional Spatial Strategy for the South West - Secretary of State's Proposed Changes?

5.53. The Regional Spatial Strategy sets out the Government's proposals for the Joint Core Strategy area to the year 2026. While the three Councils object to a number of policies within the Regional Spatial Strategy in particular some of the areas of search for urban extensions, it is important in planning the future of the area that the Joint Core Strategy sets out what the priorities are for sustainable mixed communities in the Joint Core Strategy area.

Local issues affecting this policy area

5.54. The following Key Issues (see Spatial Portrait and Issues) and Strategic Objectives (see Vision and Objectives) are particularly relevant to this policy area.

Key Issues: 4 / 3 / 12 / 13 / 14

Strategic Objectives: 1 / 2 / 3 / 4 / 8 / 9 / 10

Commentary

5.55. The Joint Core Strategy area contains a wide variety of mixed communities that are supported by a range of community infrastructure such as healthcare, open space, parks and gardens, transport and education. Many of these are provided alongside development through developer contributions, in association with other public funding, to ensure that communities have access to a range of community needs. In planning the future of the Joint Core Strategy area, a strategy needs to be developed that ensures that this infrastructure is maintained and improved upon. The strategy should also consider how it can deliver a wider sustainable environment for people to live in.

5.56. To achieve this, the Joint Core Strategy will need to establish what the priorities are for the provision of community infrastructure. These priorities will be informed by the current Sustainable Community Strategies but it is also important to seek your views on what you feel should be prioritised.

5.57. Listed below is a selection of infrastructure that could be secured through development:

- Affordable housing
- Education
- Community facilities, eg. village halls, post offices, libraries etc
- Formal sport and recreation
- Informal sport and recreation, including open space
- Flood prevention measures
- Walking and cycling improvements
- Public transport improvements
- New roads and highways
- Rail improvements
- Public realm improvements
- Climate change measures
- Renewable energy initiatives
- Other (please specify)

Please choose which six of the above that you would make the priority to be secured through development proposals.

Sustainability Impact

5.58. You may want to consider the following Sustainability Objectives (See <http://www.gct-jcs.org/SustainabilityAppraisal/Home.aspx>) when responding to questions on this policy area: 1, 2, 3, 4, 7, 8, 12, 14, 16, 17 and 18.

Urban Regeneration

National Policy Context

5.59. The following national planning policy documents need to be considered in developing this policy area:-

- Planning Policy Statement 1: Planning Sustainable Development
- Planning Policy Statement 3: Housing
- Planning Policy Statement 6: Planning for Town Centres
- Draft Planning Policy Statement 4: Planning for Sustainable Economic Development

Regional Planning Context

- CSS: The Core Spatial Strategy
- Development Policy A: Development at Strategically Significant Cities and Towns
- HMA3: Gloucester and Cheltenham HMA

Local Context

- Gloucester Heritage Urban Regeneration Company (GHURC)
- Cheltenham Civic Pride

Local issues affecting this policy area

5.60. The following Key Issues (see Spatial Portrait and Issues) and Strategic Objectives (see Vision and Objectives) are particularly relevant to this policy area.

Key Issues: 4 / 5 / 12

Strategic Objectives: 5 / 8 / 10

Commentary

5.61. The Regional Spatial Strategy requires the existing urban areas to provide significant levels of housing and employment. While the three Councils currently object to a number of policies within the most recent version of the Regional Spatial Strategy there are a number of important urban regeneration initiatives that are already being promoted within Gloucester and Cheltenham, namely the Gloucester Heritage Urban Regeneration Company and Cheltenham Civic Pride.

5.62. It is important that in bringing forward urban regeneration schemes (which are primary on brownfield sites and urban extensions normally on the edge of settlements) that this is done so in a complimentary rather than conflicting manner. Given the proposals set out in the Regional Spatial Strategy, the level of house building that will need to come forward on an annual basis is likely to be higher than that which can be achieved from the urban areas alone. In the same vein it is not appropriate to release

large areas of greenfield land on the edge of urban areas at the expense of the wider regeneration of the urban areas.

5.63. The urban areas of Gloucester and Cheltenham are vital to the Gloucestershire economy and must be revitalised if they are to continue to be attractive places for people to visit, work and live. The Joint Core Strategy will need to consider the manner in which urban sites and greenfield urban extensions can be brought forward in an integrated manner so that housing requirements can be achieved without compromising urban regeneration.

5.64. In order to bring forward and promote urban regeneration the Joint Core Strategy could identify and define key regeneration areas and identify a suite of policies for each that will help shape the way sites are developed. Such areas could include the regeneration areas of the Gloucestershire Heritage Urban Regeneration Company and the sites covered by Cheltenham Civic Pride.

5.65. The following illustrations shows the extent of the Gloucester Heritage Urban Regeneration Company regeneration area and the key sites within it and the sites included within Cheltenham Civic Pride.

Figure 4: Gloucester Urban Area

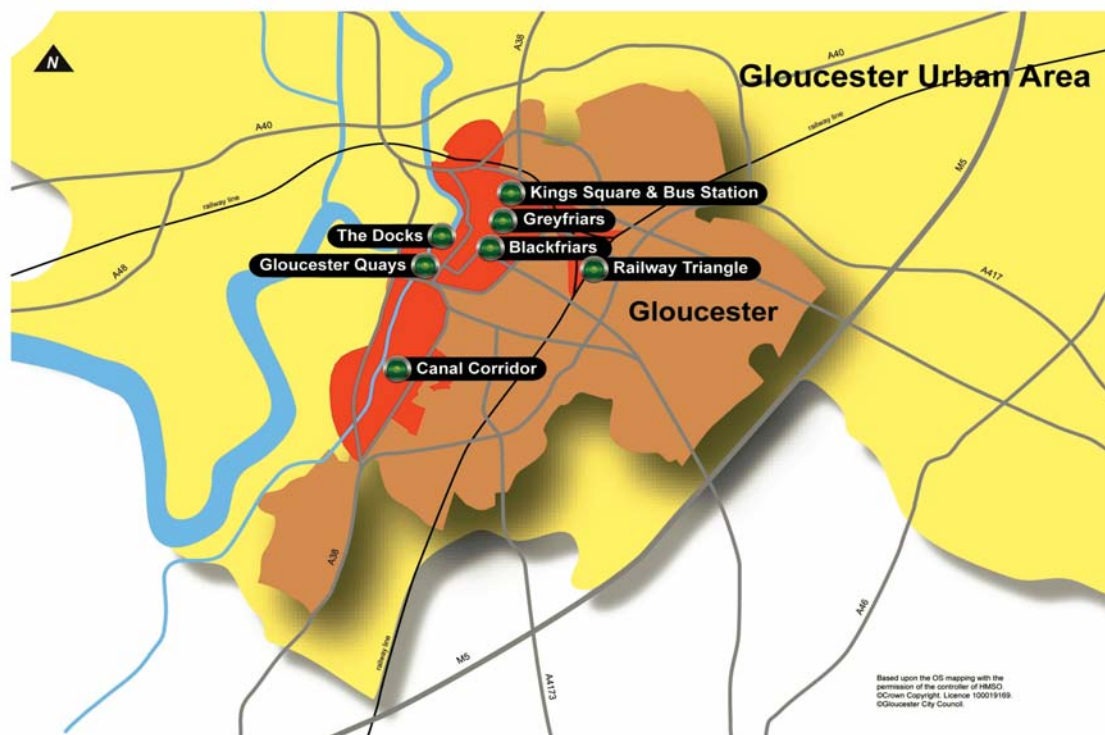
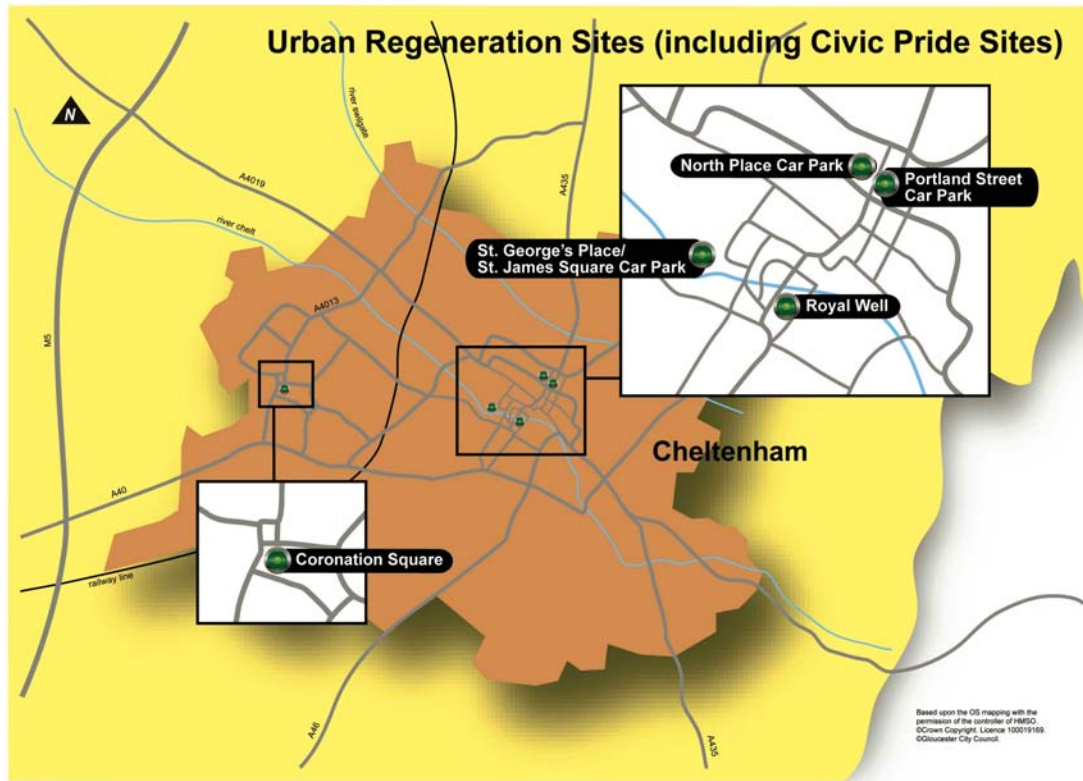


Figure 5: Cheltenham Urban Area



5.66. The Joint Core Strategy will need to develop a policy framework that allows these sites to come forward in parallel to peripheral greenfield sites. This consultation seeks your views on how this could be achieved.

Things to consider	Outcome
<p>The Joint Core Strategy could identify key areas of Gloucester City and Cheltenham as regeneration areas and include a suite of policies specific to them to bring forward development schemes.</p>	<p>The area delineating the remit of the Gloucester Heritage Urban Regeneration Company and an area outlining the extent of Cheltenham's Civic Pride could be set out in a Joint Core Strategy Policy.</p> <p>The policy could also identify a number of key sites that will be brought forward as part of the regeneration area, along with specific design and infrastructure requirements included.</p> <p>While the regeneration areas would have specific policies for them guiding development proposals, they would not be strategic allocations. This would allow a greater range of flexibility in bringing the whole area forward. This could result in less certainty about how sites could be developed</p>
<p>The Joint Core Strategy could include specific strategic allocations for sites within the urban areas and bring forward development on a site-by-site basis.</p>	<p>This would set out a series of development policies specific to key regeneration sites within the Joint Core Strategy area. This could require a greater degree of certainty in terms of delivery. It could identify fewer areas for development as it would only identify those sites that are fundamental to the delivery of the Joint Core Strategy. This would provide a degree of certainty to development but give less flexibility.</p>
<p>The Joint Core Strategy could adopt an approach where it seeks to introduce regeneration initiatives within Tewkesbury itself or the rural areas.</p>	<p>While there is no active vehicle for regeneration within the rural areas or Tewkesbury this could build upon the Healthy Towns Initiative and / or foster greater opportunities for the regeneration of rural areas.</p>

What approach do you think should be used to bring forward urban regeneration sites?

Managing The Release of Land

5.67. The Joint Core Strategy will need to consider how it manages the release of land across the area. In order to manage bringing forward urban sites in a complementary way with sites on the edge of the urban areas, a phasing policy could be included. This could be used to ensure that sites within the urban area are either brought forward in advance of sites on the edge of the urban areas or at the same time as them.

Things to consider	Outcomes
The Joint Core Strategy could include a phasing policy that ensures that sites within the urban area are brought forward in advance of those on the edge of the urban areas.	This approach would focus on urban brownfield land before greenfield land. This may be a difficult policy to implement on the basis that urban sites can be more difficult to develop than greenfield sites on the edge of the urban area. It may also restrict sites that are in sustainable locations in preference for sites within the urban areas.
The Joint Core Strategy could include a phasing policy that allows both urban and greenfield sites on the edge of the urban area to come forward together at the same time	This would need to be implemented in a co-ordinated manner that is focused on bringing forward sites based on their ability to create and contribute to sustainable communities. Sites would be included within the Joint Core Strategy housing trajectories on the basis of this and brought forward in a manner that seeks to ensure that urban areas are revitalised and regenerated as planned.
The Joint Core Strategy could be prepared without a phasing policy and allow the market to dictate when sites are developed.	This would not require the Joint Core Strategy to include a policy on phasing at all and allow the market to determine when a site shall be brought forward. It may not provide the clarity or certainty required from the development plan process, and may not ensure brownfield regeneration sites are delivered.

How do you think that the Joint Core Strategy should manage the phasing of urban regeneration and greenfield development?

Sustainability Impact

5.68. You may want to consider the following Sustainability Objectives (See <http://www.gct-jcs.org/SustainabilityAppraisal/Home.aspx>) when responding to questions on this policy area: 6, 7, 8, 11 and 18

6. Topic Based Policy Areas

6.1. This section of the document introduces the topic areas that the Joint Core Strategy may need to address. Topic based policies are intended to apply across the Joint Core Strategy area. For each topic there is a brief description of the policy context at a national and regional level and an explanation of how this translates locally. This is followed by an outline of what needs to be considered within that policy area and a set of potential outcomes. Each section concludes by asking for your views on how the policy area could be tackled.

6.2. Your views are also sought on whether these are the right topics to focus on in the Joint Core Strategy. Please respond if you think there are additional topics that the Joint Core Strategy should cover.

Affordable Housing

National Policy Context

6.3. The following national planning policy documents need to be considered in developing this policy area:-

- Planning Policy Statement 1: Planning Sustainable Development
- Planning Policy Statement 3: Housing

What is the implication of National Policy on this topic area?

6.4. Planning Policy Statement 3: Housing states that everyone should have the opportunity of living in a decent home, which they can afford, in a community where they want to live. As part of this, the Government is committed to providing high quality housing for people who are unable to access or afford market housing as well as making the step from affordable housing into home ownership. Planning Policy Statement 3 also states that Regional Spatial Strategies should set out the regional approach to addressing affordable housing needs, including an affordable housing target for the region.

Regional Planning Context

- CSS: The Core Spatial Strategy
- H1: Housing Affordability

Local issues affecting this policy area

6.5. The following Key Issues (see Spatial Portrait and Issues) and Strategic Objectives (see Vision and Objectives) are particularly relevant to this policy area.

Key Issues: 2 / 4

Strategic Objectives: 3

Commentary

6.6. The Gloucester and Cheltenham sub-region has been identified as a Housing Market Area which broadly covers the whole of Gloucestershire. Within this, Gloucester, Cheltenham and Tewkesbury Borough have been identified as a housing sub-market area that contains approximately 132,000 households. Within the Joint Core Strategy area there are a number of different issues regarding housing and provision, however, affordability is an increasing problem across the entire area and there is demand for more affordable housing of all sizes. Both Cheltenham and Gloucester are also known to experience high levels of overcrowding, which can be a sign of lack of larger affordable units.

6.7. Planning Policy Statement 3 requires local authorities to set out an affordable housing target. The Joint Core Strategy will need to consider what that target should be and how affordable housing could be delivered. The Joint Core Strategy will have to balance the need to create mixed and balanced communities with the economic viability of securing affordable housing through private sector development.

6.8. Evidence to determine the level of affordable housing required across the Joint Core Strategy area is provided by the Gloucestershire Housing Market Assessment which has been subject to a viability assessment. The Housing Market Assessment and viability assessment are currently being updated and will inform the development of the emerging affordable housing policy.

6.9. The majority of affordable housing will be delivered as part of mixed open market development across the Joint Core Strategy area, although 'exception sites' may be used to provide purely affordable housing development in locations where housing would normally not be permitted. In such instances exceptions can be made due to the community benefit of the affordable housing. Most exception sites are likely to be in the rural areas of Tewkesbury Borough adjacent to an existing settlement or within the smaller rural settlements themselves. It is possible therefore to consider an option for delivering affordable housing through exceptions sites within the Joint Core Strategy.

6.10. The Joint Core Strategy will need to decide what is the minimum number of houses a site should provide for affordable housing to be required and the percentage of affordable housing such sites should deliver. Any policy that is developed will need to be subject to viability advice to make sure it can be implemented.

6.11. This consultation seeks to gain your views on the potential ways the Joint Core Strategy could ensure that sufficient affordable housing is provided.

Provision of Affordable Housing

Things to consider	Outcome
1. Adopt the Draft Regional Spatial Strategy for the South West requirement of 35% as a minimum.	This is the draft RSS requirement and should be the minimum sought in the Joint Core Strategy area.
2. The Joint Core Strategy could set a target of 40% or higher across the whole area.	Higher affordable housing requirements have the potential to provide more affordable housing where viable. A percentage higher than 40% may not be viable, especially on some brownfield sites. Higher targets also may reduce the contributions sought for infrastructure provision.
3. The Joint Core Strategy could set different percentage targets for greenfield and brownfield sites.	This would allow a flexible approach to providing affordable housing that considers the viability of bringing forward different land types.
4. The Joint Core Strategy could set specific targets for specific sites as well as an area wide target.	This would allow higher provision to be provided on sites where it was deemed viable as part of the development plan process.

What approach to securing affordable housing should be adopted in the Joint Core Strategy?

Should all sites contribute to affordable housing or should a threshold be introduced? If so, what should that threshold be?

What should the threshold be for the provision of affordable housing in rural areas?

Sustainability Impact

6.12. You may want to consider the following Sustainability Objectives (See <http://www.gct-jcs.org/SustainabilityAppraisal/Home.aspx>) when responding to questions on this policy area: 12 and 15

Sustainable Buildings

National Policy Context

6.13. The following documents need to be considered in developing this policy area:-

- Planning Policy Statement 1: Planning Sustainable Development
- Supplement to Planning Policy Statement 1: Climate Change
- Planning Policy Statement 25: Flood Risk
- The Code for Sustainable Homes
- Climate Change Bill

Regional Planning Context

- RE5 - Development Policy G

Local issues affecting this policy area

6.14. The following Key Issues (see Spatial Portrait and Issues) and Strategic Objectives (see Vision and Objectives) are particularly relevant to this policy area.

Key Issues: 3

Strategic Objectives: 1

Commentary

6.15. Approximately half of the carbon emissions in the UK are due to buildings. If transport between them is considered, then it is not difficult to see that development can have a significant impact on climate change. Buildings can be designed to waste less energy or even create their own energy. They can also be designed in such a way that they are resilient to climate change in terms of increased temperatures and weather events.

6.16. For many years Building Regulations have provided a basis for standards with regard to the efficiency of buildings in terms of energy use, insulation and water usage. In an attempt to improve on this, and increase performance across a range of sustainability measures, the Government recently introduced the Code for Sustainable Homes. This not only looks at thermal performance but has high standards for the use of water, recycled materials and other sustainability criteria. Buildings are rated on scale of 1 to 6 where Code 1 is broadly the standard of existing Building Regulations and code 6 is very sustainable zero carbon.

6.17. The Code is currently being rolled out, with standards expected to increase over the next 7 years. While currently Code level 3 is only compulsory for all social housing, this will change as building regulations are upgraded to accommodate the new standards.

6.18. The existing Buildings Research Establishment Environmental Assessment Methodology (BREEAM) Standards is one way of measuring the build quality of

buildings, however, in terms of energy, through the Building Regulations commercial builders will need to achieve higher standards. They will be expected to be 25 per cent more efficient by April 2010 and zero carbon by 2019.

6.19. This timetable is ambitious and it will propel the UK from a poorly performing nation, in terms of sustainable construction to somewhere near the top. There is still room, however, for flexibility and it needs to be clear as to whether or not there should be negotiation regarding certain aspects of the Code. For example: if in a particular area water availability is not a problem, are such tight restrictions on water usage needed?

6.20. In addition to the above, local authorities are being encouraged to adopt 'Merton style' rules, where a certain percentage of the building's energy is generated through renewable or low carbon means. A floor of 10% is being set by the Regional Spatial Strategy for the South West - Secretary of State's Proposed Changes for large scale development. Any increase from this will have to be justified. Your views on this issue are sought in the Renewable Energy section of this consultation document.

6.21. Sustainable buildings are about more than just achieving the Code for Sustainable Homes and BREEAM standards, they must also contribute to a high quality of life and feeling of well-being. While some of these are part of regulations others are not. Adaptation to climate change is also increasingly important and there is an expectation that development will need to be more resilient to freak weather events and be capable of keeping cool during more intense heat waves in the future.

6.22. The Joint Core Strategy will need to address how all these aspects of sustainability are incorporated into new buildings. It should not, however, just duplicate national policy but adapt it to meet local requirements and the local market. There is also a balance to be achieved in adopting standards between the requirement for energy efficient buildings and the need to secure other infrastructure contributions from development and ensuring that schemes remain viable.

6.23. This consultation seeks your views on how the Joint Core Strategy can deliver sustainable buildings and what standards it should be seeking to achieve.

Things to Consider	Outcome
The Joint Core Strategy could rely on national building standards.	This would result in buildings that are more energy efficient than those constructed historically. Viability is less of an issue as this requirement would be aligned to national regulations.
The Joint Core Strategy could pursue local variations depending upon market conditions and sustainable needs on specific sites.	While leading to varying levels of sustainability it will mean that sites can come forward and be built to local sustainable needs. This may have an impact upon scheme viability and contributions sought for other things such as infrastructure and affordable housing.
The Joint Core Strategy could pursue a more rapid timetable for the adoption of standards.	This would require developers to accept a shorter timetable for adoption of the Code or that certain aspects of the Code/BREEAM were to be accelerated. Viability would need to be considered to ensure that it was not excessively burdening the development industry.
Bring forward additional requirements not included within the Code/BREEAM assessment relating to the buildings environments.	The code does not cover all aspects of sustainability. This could, for example, require significant measures in terms of adaptation to climate change, such as green roofs and significant tree planting. This would introduce a range of other climate change adaptation measures but may affect scheme viability and contributions sought for other things such as infrastructure and affordable homes.

What approach should the Joint Core Strategy take to deliver sustainable buildings?

Sustainability Impact

6.24. You may want to consider the following Sustainability Objectives (See <http://www.gct-jcs.org/SustainabilityAppraisal/Home.aspx>) when responding to questions on this policy area: 2, 3, 4, 5, 6, 9 and 16

Renewable Energy

National Policy Context

6.25. The following documents need to be considered in developing this policy area:-

- Planning Policy Statement 1: Planning Sustainable Development
- Supplement to Planning Policy Statement 1: Climate Change
- Planning Policy Statement 22: Renewable Energy
- The Code for Sustainable Homes
- Climate Change Bill

Regional Planning Context

- RE1 - Renewable Energy Targets
- RE5 - Renewable Energy and New Development

Local issues affecting this policy area

6.26. The following Key Issues (see Spatial Portrait and Issues) and Strategic Objectives (see Vision and Objectives) are particularly relevant to this policy area.

Key Issues: 3

Strategic Objectives: 1

Commentary

6.27. Climate change and energy security will be two of the main issues to impact upon the Joint Core Strategy area in the coming years. The Climate Change Bill makes clear the threats from Climate Change and the sort of response that is needed. Currently the Joint Core Strategy area is generally dependant largely on imported fossil fuels to provide its energy. Not only is this unsustainable but results in significant leakage of capital out of the area impacting upon the local economy.

6.28. At present very little renewable energy is generated in the Joint Core Strategy area, the notable exceptions being the landfill gas sites at Hempsted and Wingmore Farm, together these provide 6.75 Mega Watts of Energy. There are smaller facilities such as the biogas at Netheridge and heat is now generated from wood chip at a number of sites the largest being the facility at the National Star College, Cheltenham. On the positive side many small-scale photovoltaic roofs, solar hot water, ground source heat pumps and wind turbines have now been installed promoted by generous national and local grants.

6.29. Government and Regional Policy are geared very much to encouraging renewable energy with very ambitious targets being agreed. For example, in the South West the target is 509 - 611 MW by 2010 of which Gloucestershire is expected to supply 40 - 50 MW. This requirement is not split by district but it is clear that the county is nowhere near hitting this. The 2020 target is for 850 MW. Nationally as part of

a 20% European Union-wide target we have a legally binding target for 15% of our energy to come from renewables by 2020, a 7-fold increase in just 10 years.

6.30. The Joint Core Strategy area has the potential to use significant renewable resources. Not only in terms of wind power but also in low head hydroelectric (the river Severn could produce significant energy if the existing weirs were exploited) and biomass. On a smaller scale woodchip can provide heat for buildings and the use of solar hot water, photovoltaics and ground source heat pumps are becoming more common place. Although the Regional Spatial Strategy for the South West -Secretary of State's Proposed Changes requires on site renewables as part of development, a more positive approach could be promoted in the Joint Core Strategy.

6.31. The challenge for the Joint Core Strategy is to facilitate the development required to achieve these much needed targets in a manner that ensures the most appropriate sites are exploited taking into account competing interests, such as environmental protection and viability.

6.32. While the proposed Infrastructure Commission will deliberate on large-scale schemes, the vast majority of the proposals that come forward will be determined by the District Authorities (or the County in relation to some waste related development). It will be important therefore that the Joint Core Strategy sets out a strategic approach for renewables to guide development in the wider public interest.

6.33. This consultation seeks your views on how renewable energy could be achieved across the Joint Core Strategy area and what targets, if any, it should set.

Things to consider	Outcome
The Joint Core Strategy could seek to exceed UK and South West targets by adopting a very proactive policy.	This may require an open market approach to the provision of renewable energy. Invariably the windiest sites are likely to be exploited. New weirs may have to be constructed across the Severn. Energy from waste would be promoted.
The Joint Core Strategy could adopt a measured proactive approach by identifying areas where renewable energy might be appropriate.	This would identify the most appropriate areas of search, not only for windpower, but also low head hydroelectricity schemes and other renewables. This would provide certainty for developers and the community alike. On its own, this approach may not be enough to achieve national and regional targets.
The Joint Core Strategy could adopt a business as usual approach.	This essentially means continuing the very constraining approach to renewable energy production that exists today. This may lead to planning by appeal as developers understand national policy will over-ride local objection. This could result in the most economic sites being exploited as developers will focus resources where returns are greatest.

What approach should the Joint Core Strategy take to renewable energy?

Sustainability Impact

6.34. You may want to consider the following Sustainability Objectives (See <http://www.gct-jcs.org/SustainabilityAppraisal/Home.aspx>) when responding to questions on this policy area: 2, 3 and 6

Flooding

National Policy Context

6.35. The following documents need to be considered in developing this policy area:-

- Planning Policy Statement 1: Planning Sustainable Development
- Supplement to Planning Policy Statement 1: Climate Change
- Planning Policy Statement 25: Flood Risk
- The Pitt Report
- The Draft Water and Flood Bill

Regional Planning Context

- F1 - Flood Risk

Local issues affecting this policy area

6.36. The following Key Issues (see Spatial Portrait and Issues) and Strategic Objectives (see Vision and Objectives) are particularly relevant to this policy area.

Key Issues: 3 / 11

Strategic Objectives: 1 / 2

Commentary

6.37. June and July 2007 saw significant flooding across the Joint Core Strategy area. The flood event saw significant surface water flooding and small streams overflowing their channels, often into homes and businesses. This was followed a few days later by the Severn over-topping its defences to cause even more flooding, primarily in Tewkesbury. The situation was worsened by stresses on critical infrastructure such as the Mythe Water works at Tewkesbury and the Electricity Substations at Castlemeads and Walham. For those who experienced the flooding first hand, this is clearly one of the key issues facing the Joint Core Strategy area.

6.38. Lesser floods at the turn of the 20th Century resulted in an update of national planning guidance and Planning Policy Statement 25: Flooding was published in 2006. This gave a clear policy direction for planning authorities and is still the basis on which flood related issues are determined today. Inappropriate development is not allowed on the flood plain. Indeed, the vast majority of dwellings subject to flooding in 2007 were built at a time when these events were not as common as they are today.

6.39. The challenge now is to determine exactly where flooding could occur, as it will vary depending on the type of flood. Surface water flooding is harder to predict as it can be caused by the failure of a culvert or rubbish and debris, such as a discarded mattress, being in the wrong place at the wrong time.

6.40. To try to understand which land is more vulnerable to flooding, Level 1 and Level 2 Strategic Flood Risk Assessments have been commissioned. The Level 1 report has

already been published and is being used to inform the Joint Core Strategy, while the second, looking at specific vulnerable areas, is being undertaken. These will provide more detail of where flooding is likely to occur.

6.41. The assessments will also include a climate change model as it is understood that extreme weather events will become more frequent and intense as the planet slowly warms up. Sea level rise may also have an impact as ice sheets and glaciers melt, expanding the oceans and causing higher tides.

6.42. With regard to surface water, a Surface Water Management Plan has been commissioned for some parts of the area. This will also provide more information as to which areas are more vulnerable to surface water flooding and should help plan for future developments.

6.43. Once all these areas are mapped it will be possible to apply policy with more certainty and rigour and ensure that events like the past are minimised.

6.44. There is a need to ensure that areas that have in the past been vulnerable become less so. Occasionally this may require new defences, however, it may be better to increase capacity elsewhere or, in the case of the Severn at Gloucester, increase flow out into the Estuary. Development may have a role in funding managed retreat opportunities along the Severn or by constructing basins upstream of problem rivers and brooks.

6.45. Equally important is how development deals with its own surface water. When a field, garden or other green space is developed, surface water that would have soaked into the ground is intercepted by roofs and other hard surfaces and finds its way more rapidly into drains or watercourses. This has to be managed so it does not lead to streams and sewers being over burdened. For a number of years large developments have achieved this through balancing ponds and underground storage tanks. These fill up in times of flood and then drain down slowly in a similar way to a green field. There is a move locally and by government to ensure that all development deals with its own water as near to source as possible and in a sustainable manner. This is called Sustainable Urban Drainage and is expected to become standard practice over the years to come. It should be noted that different techniques are used depending on the type of soil in an area. On clay soils this is largely centred around storage.

6.46. This consultation is seeking your views on how the Joint Core Strategy should deal with flood risk and its causes.

Things to consider	Outcome
The Joint Core Strategy could adopt a business as usual approach and rely on national policy.	This carries on using Planning Policy Statement 25 and any successor as the basis for planning decisions where flooding is a concern. While considered to be adequate, the Joint Core Strategy could move beyond this
The Joint Core Strategy could adopt a more precautionary approach to flood risk.	This could involve re-classifying the type of building appropriate within a certain flood zone. For example, at the moment Planning Policy Statement 25 classifies shops and restaurants as 'Less vulnerable' and, therefore, potentially acceptable in the 1 in 100 flood zone (3a). These uses could be moved into the 'More vulnerable' category. Alternatively the flood zones could be extended by 10 metres. This would ensure a "belt and braces" approach.

**What approach should the Joint Core Strategy take to Flood Prevention?
Sustainability Impact**

6.47. You may want to consider the following Sustainability Objectives (See <http://www.gct-jcs.org/SustainabilityAppraisal/Home.aspx>) when responding to questions on this policy area: 3, 4 and 5

Employment

National Policy Context

- Planning Policy Statement 1: Delivering Sustainable Development
- Planning Policy Statement 4 (draft consultation document)

Regional Spatial Strategy for the South West - Proposed Changes

- CSS - The Core Spatial Strategy
- Development Policy A - Development at Strategically Significant Cities and Towns
- Development Policy B - Development at Market and Coastal Towns
- Development Policy C - Development at Small Towns and Villages
- HMA 3 - Gloucester and Cheltenham Housing Market Assessment
- RTS6 - Airports and Heliports
- ES1 - Sustainable Economic Prosperity
- ES2 - Providing for Employment Land and Premises
- ES3 - Review of Employment Sites
- TO1 - Sustainable Tourism
- TO2 - Safeguarding and Investing in Tourism Destinations
- TO3 - Major New Tourism Facilities
- ADD1 - Priorities for Addressing Deprivation and Disadvantage

Regional Economic Strategy for the South West 2006-2015
Gloucestershire Integrated Economic Strategy 2009 - 2015

Key Issues: 2 / 3 / 4 / 6 / 7 / 10 / 11 / 13

Strategic Objectives: 5 / 6 / 12

Commentary

6.48. The recession has generated considerable uncertainty in relation to the economy of the Joint Core Strategy area. A key question for the Joint Core Strategy is what kind of land and premises are needed for the future.

6.49. The Integrated Economic Strategy for Gloucestershire has been recently published by Gloucestershire First on behalf of its partners. Employment priorities in the emerging delivery plans will form part of the evidence base for the Joint Core Strategy.

6.50. In establishing an approach for the Joint Core Strategy area it is necessary to balance the needs of the urban areas and those of the rural areas, where an emphasis for possible economic development may be tourism, in addition to wider economic growth objectives. Strengthening and developing the tourism sector in both rural and urban locations. This is particularly important to ensure that the rural economy does not become unduly dependent upon lower paid and potentially seasonal opportunities.

6.51. A further key balance to be addressed within the Joint Core Strategy area is the extent to which new residents are to be encouraged into the area in order to improve its economic performance, as against the extent to which the skills of existing residents are to be developed in order to allow them to attract and take up developing employment opportunities.

6.52. This consultation seeks your views on how the Joint Core Strategy may address employment and economic activity.

Things to consider	Outcome
<p>The Joint Core Strategy could endorse a centralised and specialised economy, with an emphasis in rural areas for services to meet local need and tourism.</p>	<p>The key hub of Cheltenham and Gloucester would experience the majority of employment growth.</p>
<p>The Joint Core Strategy could make land available to meet the needs of key sectors at and adjacent to Cheltenham and Gloucester, with more limited land allocations for employment uses in more rural areas.</p>	<p>Development of economic specialism(s) could be associated with the development of key economic 'clusters', creating a significant contribution to economic growth.</p> <p>The approach risks a less dynamic rural economy, and initiatives relating to the development of land. Premises would have to be coordinated with interventions, such as skills development, in order to ensure that local economies did not become polarised (depending upon the specialisms in question).</p>
<p>The Joint Core Strategy could endorse a continuation of a dispersed and diverse economy, including flexible allocations and a greater variety of employment in rural areas.</p>	<p>A greater proportion of economic growth would be experienced in the rural areas, but potentially to the detriment of environmental sustainability objectives</p>
<p>The Joint Core Strategy could endorse a specialist economy, with high emphasis on meeting the employment needs of the existing population. Specialisms are chosen on the basis of the potential of the existing population for participation, including through measures such as skill development</p>	<p>Existing residents may be able to derive greater benefit from economic growth, but if skills-development and other interventions are not successful then development of specialisms through inward investment may be hampered.</p>
<p>The Joint Core Strategy could endorse a specialist economy, with a high emphasis upon attracting people with the associated skills needed to develop the selected specialisms.</p>	<p>A greater degree of prosperity may be achieved, but this approach would have to be carefully coordinated with other policy areas in order to ensure that existing residents benefit.</p>
<p>The Joint Core Strategy could allow employment uses to locate where the market dictates, subject to basic criteria, such as protection of the environment.</p>	<p>Allowing the market to dictate the location of employment land could lead to an uneven distribution of employment growth across the JCS area and pressure on the greenfield sites. An approach responsive to the needs of employers and may encourage specialist employment.</p>

<p>Should employment uses be allowed to locate wherever they like subject to base criteria such as protection of the environment.</p>	<p>Possible uneven distribution of employment growth across the JCS area and pressure on the greenfield sites. An approach responsive to the needs of employers and may encourage specialist employment.</p>
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What approach should the Joint Core Strategy take to secure better economic growth?

Sustainability Impact

6.53. You may want to consider the following Sustainability Objectives (See <http://www.gct-jcs.org/SustainabilityAppraisal/Home.aspx>) when responding to questions on this policy area: 10, 11, 12, 17 and 18

City and Town Centres

National Policy Context

- Planning Policy Statement 1: Planning Sustainable Development
- Planning and Climate Change - Supplement to Planning Policy Statement 1
- Planning Policy Statement 3: Housing
- Planning Policy Statement 6: Planning for Town Centres
- Draft Planning Policy Statement 4: Planning for Sustainable Economic Development

Regional Spatial Strategy for the South West - Proposed Changes

- CSS: The Core Spatial Strategy
- Development Policy A: Development at Strategically Significant Cities and Towns
- TC1: City and Town Centres
- C1: Regional and Sub-regional Cultural Infrastructure
- TO1: Sustainable Tourism
- TO2: Safeguarding and Investing in Tourism Destinations
- T3: Major New Tourism Facilities

Key Issues: 7 / 8 / 12

Strategic Objectives: 3 / 5 / 6 / 7 / 10 / 12 / 13

Commentary

6.54. Gloucester and Cheltenham town centres are of regional significance, both providing for a range of town centre uses including retail, leisure and entertainment, tourism, employment and housing.

6.55. In terms of retail and leisure, the two centres have traditionally differed quite considerably. Cheltenham for example, is the South West's second most influential retail centre behind Bristol, and has a retail offer, catchment and expenditure far greater than that which would normally be expected of a town of its size. Cheltenham attracts shopping visitors from a significant distance, and more recently shopping weekends involving an overnight stay have become popular. Cheltenham is also renowned for having a very good evening and night-time economy, with a choice of restaurants and bars, and cultural facilities such as the Everyman Theatre and Town Hall.

6.56. In both retail and leisure terms, Gloucester plays a more localised role, having less retail and leisure on offer than would normally be expected of a city of its size. The evening economy in Gloucester is currently rather limiting, lacking a variety of different activities and venues to cater for a cross-section of tastes and lifestyles. In terms of tourism, Gloucester attracts a significant number of day-time visitors, but struggles to attract overnight tourism visitors. This is currently very little hotel accommodation in the city centre, particularly of higher quality.

6.57. That said, the opening of Phase 1 of the Gloucester Quays Designer Outlet Centre has provided an important addition to the retail and leisure offer in the city, and is proving to be a big success in attracting visitors from near and far.

6.58. Looking forward, it is important that the role of Cheltenham town centre as one of the south west's principal retail destinations in the South West is maintained. There is considerable scope to improve the retail, leisure and cultural offer in Gloucester, making the best of its unique assets. It will also be important to ensure a complementary function is developed between the city centre and Gloucester Quays.

6.59. In both centres, the ongoing regeneration initiatives through Gloucester Heritage Urban Regeneration Company (GHURC) and Civic Pride will have a positive impact in terms of creating more attractive environments and expanding the range of town centre uses.

6.60. A regeneration scheme will be drawn up in the future for Tewkesbury town centre to deal with redundant buildings and open spaces and to ensure the viability and diversity of the town centre.

Things to consider	Outcome
The Joint Core Strategy could concentrate on Regeneration Sites Only. Town Centre sites that are located within regeneration areas (GHURC and Civic Pride) would be prioritised for the development of town centre uses.	This would result in a concentrated town centre though it could restrict some uses from locating in the centre, for example through a lack of available sites.
The Joint Core Strategy could allow for the expansion of Town Centres. Town Centre sites that are located within regeneration areas (GHURC and Civic Pride) would be prioritised for the development of town centre uses, but extension(s) to the centre would be identified.	Town Centre sites that are located within regeneration areas (GHURC and Civic Pride) would be prioritised for the development of town centre uses, but extension(s) to the centre would be identified. This could provide more flexibility and choice within the centre.

Should town centres be expanded or should the focus be on regenerating existing town centre sites?

If you think town centres should be expanded, where do you think would be the most appropriate location?

What should the future roles and relationship be between Gloucester City and Cheltenham?

Sustainability Impact

6.61. You may want to consider the following Sustainability Objectives (See <http://www.gct-jcs.org/SustainabilityAppraisal/Home.aspx>) when responding to questions on this policy area: 7, 8, 10, 11 and 18

Green Infrastructure

National Policy Context

- Planning Policy Statement 1 Delivering Sustainable Development
- Planning Policy Statement 9 Biodiversity and geological conservation.
- Planning Policy Guidance 17 Planning for open space, sport and recreation
- Natural England Green Infrastructure Guidance

Regional Policy Context

- Regional Spatial Strategy GI1 ENV1 ENV4

Key Issues: 1

Strategic Objectives: 1 / 2 / 4 / 10 / 12

Commentary

6.62. The landscape of the Joint Core Strategy area has been formed by the interaction of the rivers Severn and Avon on the underlying geology, the resulting habitat types and settlement patterns reflect these processes. The softer lias clay typically being eroded away, creating the Severn and Avon Vales with the harder and porous limestone rising up forming a steep scarp to the east of the Joint Core Strategy area. Dotted around the Vale are the outliers of the escarpment, such as Robinswood and Chosen Hills, and the smaller river terrace hillocks, such as Hempsted and Lassington Hill.

6.63. Significant protection is already afforded to many of the habitats and landscapes within the Joint Core Strategy area through a myriad of local and national designations. Planning has typically protected these assets, while a more proactive approach to land use management has been delivered, in a somewhat random manner, with perhaps the exception of the Cotswold Area of Outstanding Natural Beauty. This is actively managed through co-operation of landowners and the Cotswold Conservation Board.

6.64. There are also a number of key locations within the Joint Core Strategy area that have a significant influence on the wider landscape, such as Cheltenham Racecourse, that provides a significant national tourist attraction as well as partly defining the local landscape.

6.65. While Planning has in the past addressed the needs of physical infrastructure ensuring roads, sewers and electricity can be adequately provided for green infrastructure has not been planned for in a co-ordinated manner. Although local authorities are familiar with negotiating Public Open Space on large developments, and ensuring precious assets are protected, what has been lacking is the need to connect these up in an integrated manner and ensuring they relate to, and are part of the wider countryside.

6.66. It could be for example, that everyone in new development is able to walk out of their dwelling and into an open green area within a couple of minutes. This green area

would then connect with more multifunctional space and ultimately into the wider countryside. Ideally, like the Area of Outstanding Natural Beauty this countryside should be subject to a management plan and be looked after for the benefit of access, wildlife and landscape.

6.67. Not only will this provide a green living space for new and existing residents but should go a long way to increasing the connectivity and resilience of existing habitats, especially in the light of climate change that will force species to migrate out of their current range.

6.68. A useful definition for green infrastructure is given in the Regional Spatial Strategy. It states that green infrastructure 'consists of strategic networks of accessible multifunctional sites (including parks woodland, informal open spaces, nature reserves and historic sites), as well as linkages (such as river corridors and greenways). These contribute to people's well-being and together comprise a coherent managed resource, responsive to evolving conditions'

6.69. In the Joint Core Strategy area there is a need to look at how development can deliver its own green infrastructure, as well understanding the strategic dimension. For this it is assumed that towards the east of the area the Cotswold Area of Outstanding Natural Beauty provides this strategic green infrastructure function admirably. The main challenge here is ensuring new and existing development is properly 'plugged into' it.

6.70. For the west of the area the Joint Core Strategy authorities are considering the idea of a strategic green infrastructure asset broadly correlating with the washlands of the River Severn and the tributaries that flow into it. To give the area an identity and a feeling of permanence this could be called a Regional Park, Severn Park or similar.

6.71. This would complement the work being done by the Gloucestershire Wildlife Trust in their Living Landscapes project, the Strategic Infrastructure process being undertaken by the County and other work to develop the area for tourism and land based economic development.

Things to consider	Outcome
The Joint Core Strategy could concentrate effort within development	On large developments all green infrastructure (Public Open Space allotments Sustainable Urban Drainage Systems etc) are negotiated in an integrated manner. Existing assets are protected and linked by Sustainable Urban Drainage Systems features and other green links. No-one is more than a couple of minutes walk/cycle from the green infrastructure network
The Joint Core Strategy to identify a strategic green infrastructure network. Development will need to relate to this and potentially fund improvements to it.	Strategic green infrastructure is identified (Area of Outstanding Natural Beauty in the east, Severn (Regional) Park in the West). River corridors connecting new development to these will be identified.
The Joint Core Strategy to identify existing green infrastructure in urban areas.	Existing green infrastructure (public open spaces, allotments etc.) are mapped and assessed. Pinch points and connectivity problems are identified and a schedule drawn up for improvement, funded through development.
The Joint Core Strategy promotes a business as usual scenario.	Open space is negotiated on a site-by-site basis. Areas of ecological/geological/archaeological interest are protected and often form part of the adopted open space. Allotments, Sustainable Urban Drainage Systems infrastructure are provided for on a fairly ad hoc basis

What approach should the Joint Core Strategy take to providing Green Infrastructure?

Sustainability Impact

6.72. You may want to consider the following Sustainability Objectives (See <http://www.gct-jcs.org/SustainabilityAppraisal/Home.aspx>) when responding to questions on this policy area: 1, 2, 3, 4, 5, 6, 14, 16 and 18.

Gypsy and Traveller Provision

National Policy Context

- Planning Policy Statement 3: Housing
- Circular 01/2006: Planning for Gypsy and Traveller Caravan Sites
- Circular 04/2007: Planning for Travelling Showpeople

Regional Spatial Strategy for the South West - Proposed Changes

- GT1: Gypsy and Traveller Pitch Requirements
- GT2: Travelling Showpeople Pitch Requirements
- Review of Additional Pitch Requirements for Gypsies and Travellers (April 2008)

Key Issues: 2 / 4

Strategic Objectives: 3

Commentary

6.73. National Planning Policy clearly sets out that, where there is an identified need for new Gypsy and Traveller Sites, it is not acceptable to rely only on criteria based policies and allocations should be made. The need for Gypsy and Traveller accommodation in Gloucestershire has been determined through the Gypsy and Traveller Accommodation Assessment. This Assessment forms part of the technical evidence that has been used to inform the Regional Spatial Strategy.

6.74. The Regional Spatial Strategy states that gypsies and travelling people include , but are not limited to, Romany Gypsies, Irish Travellers, New Travellers and Travelling Showpeople with a variety of cultures and needs both for residential homes and stopping places .Site specific provision should take account of these different needs through assessment and consultation at the local level including joint working between local authorities .

6.75. The Regional Spatial Strategy sets out the following need requirements:

Figure 6: Gypsies and Traveller Requirements to 2011 (Pitches)

	Gloucester	Cheltenham	Tewkesbury
Permanent	18	27	75
Transit	5	10	10
Total	23	37	85

Travelling Showpeople Requirements to 2011 (Pitches)

Gloucestershire total: 26

6.76. Since April 2006, in the Tewkesbury Borough part of the Joint Core Strategy area, 41 pitches for gypsy families have been permitted (and are occupied) and a further 17 pitches for Travelling Showpeople at Gotherington have been granted temporary planning permission. Gloucester City has also allocated land for a number of pitches for Travelling Showpeople.

6.77. While Cheltenham's provision for sites will be provided in association with new development proposals, initial indicative locations for the provision of Gypsy and Traveller and Travelling Showpeople are suggested below for comment:

Gypsy Families

- Oxenton - 6 pitches
- Tewkesbury (Shutonger) - 5 pitches
- Elmstone Hardwick - 6 pitches
- Fiddington - 9 pitches

Travelling Showpeople

- Teddington Hands - 8 pitches
- Tewkesbury area - 6 pitches
- Norton - 2 pitches

6.78. Sites for provision of pitches to meet needs should be sustainable, suitable in planning terms, safe from a highway point of view and deliverable.

Things to consider	Outcome
The Joint Core Strategy could seek to identify new pitches/areas of search only in association with urban extensions.	May not always meet local need but would help to ensure diversified new communities were created. Phasing may mean need is not met if urban extensions are delayed or do not happen.
The Joint Core Strategy could focus more on deliverability and identify pitches/areas of search outside the urban areas.	Possibly more likely to deliver opportunities and meet local needs but may not be as sustainable as the above approach.

How do you think Gypsy and Traveller sites can best be provided across the Joint Core Strategy area?

Should Gypsy and Traveller / Travelling Showpeople Sites be integrated into the sustainable urban extensions or should they be accommodated elsewhere? Where could these sites be accommodated?

In identifying locations, is it appropriate to provide a large number of smaller sites or concentrate on providing a smaller number of larger sites?

Sustainability Impact

6.79. You may want to consider the following Sustainability Objectives (See <http://www.gct-jcs.org/SustainabilityAppraisal/Home.aspx>) when responding to questions on this policy area: 8, 12, 14, 15 and 17.

7. Other Policy Areas

7.1. There are a number of other topics within the Joint Core Strategy area which have not yet been covered specifically. These include; the Historic Environment; Area of Outstanding Natural Beauty; Biodiversity and Habitats and; Retail. Whilst these are very important topics and clearly merit consideration, they are already covered comprehensively by national and regional planning policy and/or national legislation. It is not necessary to duplicate national or regional policy and the government is quite clear on this issue, as set out in Planning Policy Statement 12 - Local Spatial Planning.

7.2. National and regional policy shall continue to provide the steer on these topics and will remain a material consideration in determining applications. Below is a summary of each of these topic areas setting out what existing guidelines are in place:

The Historic Environment

7.3. The historic environment is protected by national Planning Policy Guidance 15 note - Planning and the Historic Environment. This covers a range of aspects from listed buildings to historic parks and gardens, historic battlefields and conservation areas for instance. In summary, this policy aims to ensure that none of these features are adversely affected by any development proposals and, where possible, are enhanced.

Area of Outstanding Natural Beauty

7.4. Areas of Outstanding Natural Beauty were brought into being by the National Parks and Access to the Countryside Act of 1949. The Countryside and Rights of Way Act 2000 strengthened the conservation and management of Areas of Outstanding Natural Beautys in partnership with local authorities. Furthermore, Planning Policy Statement 7 - Sustainable Development in Rural Areas provides the Government's stance on proposals which affect the Area of Outstanding Natural Beauty. In summary, it sets out that significant weight should be given to the preservation of Areas of Outstanding Natural Beauty in determining any proposals which might affect them.

Biodiversity and Habitats

7.5. Planning Policy Statement 9 - Biodiversity and Geological Conservation sets out the Government's policies on protection of biodiversity and geological conservation through the planning system. This covers features such as Sites of Special Scientific Interest, Ancient Woodland and Other Important Natural Habitats. It gives significant protection to these features and aims to ensure that biological and geological diversity are conserved and enhanced as an integral part of social, environmental and economic development.

7.6. In summary, the main focus of the policy is to promote town centres for retail development. In respect of retail development away from town centres, Planning Policy Statement 6 suggests that unless there is a proven need for additional retail development beyond the town centre, such proposals cannot be considered. Where

there is a proven need this can only proceed if it would not adversely affect the vitality and viability of the town centre.

Should any of the above topics have specific policies within the Joint Core Strategy?

Are there any other topics that you think should be covered by the Joint Core Strategy?

8. Deliverability

National Policy Context

Planning Policy Statement 1: Delivering Sustainable Development
Planning Policy Statement 12: Local Spatial Planning

8.1. A key consideration in the delivery of the strategy for the Joint Core Strategy area is the manner in which infrastructure is planned and provided. National planning policy, as set out in Planning Policy Statement 12 requires Core Strategies to identify and plan positively for the infrastructure that will support the development of their area.

8.2. The definition of infrastructure is now wide ranging and includes many of the typical physical elements such as new highways and physical linkages but also encompasses the provision of wider environmental, utility, health, social and cultural infrastructure. All of these elements of infrastructure together contribute to creating sustainable communities.

8.3. The Regional Spatial Strategy requires local authorities to plan positively for all types of infrastructure, particularly through Draft Policies HMA3, C1, G11, HE1 and CS1. This consultation document considers in other sections the provision of the infrastructure requirements as set out in the Draft Regional Spatial Strategy Policies. However, within this section it is important to gain public feedback on the manner in which the funding for infrastructure can be collected.

8.4. At present securing developer contributions to the provision of infrastructure is principally undertaken through a negotiation process known as planning obligations. This is a process through which developer contributions are secured from each development proposal individually in the context of the impact that the development is likely to have upon existing and already planned infrastructure.

8.5. This can, however, be a lengthy process and does not assist with long term infrastructure planning. The Government, therefore, intends to introduce a new method of securing developer contributions to infrastructure provision called the Community Infrastructure Levy. The Government has recently consulted on how this may work and proposes to implement it in April 2010. Community Infrastructure Levy could be a single standard charge that is paid by developers for all forms of development across an authority's area for both residential and non-residential proposals. Community Infrastructure Levy, however, is unlikely to be mandatory and local authorities can choose to adopt a single levy style charge for all development through Community Infrastructure Levy or continue with the current planning obligations process.

8.6. While Community Infrastructure Levy will provide authorities the opportunity to collect funds for infrastructure, it will not fund affordable housing. This will remain a separate process secured through the existing planning obligations process.

Issues: 1 / 13 / 14

Strategic Objective: 1 / 8 / 9

Commentary

8.7. The three authorities of Gloucester, Tewkesbury and Cheltenham are working collaboratively with Gloucestershire County Council to plan positively for the full range of infrastructure required to support the strategy for the future development of the Joint Core Strategy area. This work will inform the infrastructure delivery component of the Joint Core Strategy and will assist in ensuring the strategy for the area is appropriately supported by the timely provision of necessary infrastructure.

8.8. In progressing the Joint Core Strategy the three authorities are consulting on the current manner in which developer contributions are sought and the practicalities of adopting a Community Infrastructure Levy style approach as currently envisaged by Government or retaining the existing planning obligations procedure.

8.9. This will require each of the authorities to prepare a charging schedule separate to the Joint Core Strategy that sets out a standard fee to be paid by those promoting development upon the grant of planning consent. This standard levy could then be used collectively to contribute to the provision of infrastructure proposals set out in the Joint Core Strategy. It is important to note, that while Community Infrastructure Levy may provide an element of funding for infrastructure, its purpose is not to fund infrastructure entirely but supplement existing infrastructure funding accordingly.

8.10. In setting a standard charge for all development, the Joint Core Strategy must have regard to the viability of setting such a levy on development and there may be circumstances where the charge could be lower in order to ensure that development proposals still remain viable. The Councils are, therefore, also consulting on whether this is appropriate or not.

Things to consider	Outcomes
To continue to negotiate developer contributions for infrastructure provision on a site by site basis.	Infrastructure planning will remain a critical component of the Joint Core Strategy in order to demonstrate that development can be delivered in tandem with infrastructure provision. There may be, however, less certainty as to when infrastructure may be funded. There are also fewer opportunities to provide strategic infrastructure in a co-ordinated manner.
Adopt a standard levy charge for development proposals based upon the emerging Community Infrastructure Levy.	Infrastructure planning may be provided in a more co-ordinated manner than the current process. It will also enable infrastructure funds to be provided across the authority's area and not necessarily associated with the development proposal that it is collected from. This will provide a greater opportunity to comprehensively plan infrastructure.

How should the Joint Core Strategy ensure that sufficient funding comes forward so that development is supported by the provision of associated infrastructure?

Things to consider	Outcomes
A charge should be applied uniformly across the Joint Core Strategy area to ensure that all development contributes equally to the provision of infrastructure.	A charge that is applied at the same rate for all development across the Joint Core Strategy area would ensure that all development contributed equally to the provision of infrastructure. While this would assist in ensuring consistency across the Joint Core Strategy area it may result in locations becoming unviable and contributions being negotiated. This may slow down the delivery of development and infrastructure along with impacting upon overall delivery.
A charge could be reduced in defined urban regeneration areas where land values may make development proposals unviable where a 100% charge is applied.	An overall charge that makes an allowance for development within certain locations to pay a reduced levy where viability evidence illustrates that proposals will not come forward with a levy charged at 100%. This option may result in a higher overall charge for development outside of regeneration areas to ensure that the cost of infrastructure is met.

If the Joint Core Strategy should adopt a Community Infrastructure Levy approach are there any areas or circumstances where a reduced charge could be appropriate?

Sustainability Impact

8.11. You may want to consider the following Sustainability Objectives (See <http://www.gct-jcs.org/SustainabilityAppraisal/Home.aspx>) when responding to questions on this policy area: 8, 14, 15 and 17

9. Glossary of Terms

A

Adoption - the final stage of confirmation of a plan as a statutory document by the local planning authority.

Affordable Housing - low cost housing for sale or rent, often from a housing association, to meet the needs of local people who cannot afford accommodation through the open or low cost market, or subsidised housing.

Area of Outstanding Natural Beauty - area designated by Natural England where the primary purpose is the conservation and enhancement of natural beauty including flora, fauna, geology and landscape. The Cotswolds Area of Outstanding Beauty lies in the east of the Joint Core Strategy area.

B

Biodiversity - a measure of the number and range of species and their relative abundance in an area.

Brownfield Site - land which has been previously developed, including the gardens of houses. Does not include land used for agriculture, allotments or parks.

C

Code for Sustainable Homes - A new national standard for sustainable design and construction of new homes launched in December 2006.

Community Infrastructure Levy - a potential list of contributions to infrastructure that a developer would be required to make to get planning permission. It could replace Section 106 Agreements (see below). The Government has consulted on how the Community Infrastructure Levy could work but it is not yet in place.

Conservation Area - an area given statutory protection to preserve and enhance its character.

Consultation - an exercise designed to find out what people and organisations think about a development plan or proposal. Can be a statutory requirement.

D

Density - the number of homes or residential units per hectare. Can also mean the number of square metres per employee.

Development - Changing the use of land. Can be done through building, engineering, mining and other operations.

Development Plan - The documents that determine what development is acceptable in an area. The Development Plan consists of the Regional Spatial Strategy and Development Plan Documents produced at a local level.

Development Plan Documents - Local Development Documents prepared by local planning authorities and outline what are the key development plans for the area. They form part of the Local Development Framework.

E

English Heritage - a national body funded by the Government to promote and give advice on conservation, heritage and archaeology.

Examination - All Development Plan Documents must be examined for "soundness"

by the Planning Inspectorate who will consider all comments made by the public and organisations. The Inspector will then report his/her findings.

F

G

General Conformity - the term given to the need for local policies to not contradict or harm the use of policies at a regional or national level. Local Development Documents need to be in "general conformity" with the Regional Spatial Strategy.

Gloucestershire First - the local economic development agency for Gloucestershire.

Gloucestershire Integrated Economic Strategy - a strategy produced by Gloucestershire First that describes how they believe the economy of Gloucestershire will develop.

Green Belt - an area around a settlement that is protected from most forms of development. They are designed to stop urban sprawl and towns from joining into one another.

Green Infrastructure - the term given to the network of green spaces and natural environments between and within urban areas.

Greenfield Site - an area not previously developed. Includes allotments, agricultural land, parks and buildings.

H

Housing Trajectory - A table accompanied by a graph showing our past and future housing performance by identifying the estimated provision of housing over the life of a development plan.

I

Infrastructure - infrastructure is the term given to things such as roads, sewers, schools, hospitals, railways and communication networks that make it possible for communities to work effectively.

J

K

L

Local Nature Reserve - an area designated under the National Parks and Access to the Countryside Act 1949 as being important to nature conservation and where the public is encouraged to learn about it.

Local Development Documents - these are documents produced by the local planning authority that form the Local Development Framework.

Local Development Framework - this is the name given to the collection of Local Development Documents produced by the local planning authority that set the planning policy for the area.

Local Plan - these have been replaced by Local Development Frameworks. They were single documents that set out all the local planning policies for an area.

Local Planning Authority - normally the District, Borough or City Council. The Local Planning Authority is responsible for preparing local planning policies and dealing with planning applications. County Councils are the Local Planning Authorities with regard to minerals and waste planning.

Local Strategic Partnership - a partnership of people that brings together

organisations from the public, private, community and voluntary sector within a local authority area, with the objective of improving people's quality of life. They are responsible for producing the Sustainable Community Strategy (see below).

M

Market Towns - Small to medium-sized country towns that are rural service, social and economic centres. Most also hold or used to hold a regular market.

N

Natural England - Natural England is the Government's adviser on landscape in England, with responsibility for landscape designations such as National Parks, Areas of Outstanding Natural Beauty and Heritage Coasts.

O

Objectives - objectives are what the plan or document is trying to achieve.

Open Space - All space of public value, including public landscaped areas, playing fields, parks, play areas and areas of water, which can be used for recreation and sport or act as a haven for wildlife.

P

Phasing - managing development so that it happens in manageable amounts.

Planning and Compulsory Purchase Act 2004 - the Act of Parliament that brought in the new planning system. It introduced Local Development Frameworks and Regional Spatial Strategies.

Planning Inspector/Inspectorate - an expert appointed by the Government to look at planning appeals and examine Development Plan Documents.

Planning Permission - approval from the Local Planning Authority that a development is acceptable and can take place.

Planning Policy Guidance Notes - documents produced by government that set out guidance to Local Planning Authorities on how they should deal with specific planning issues. Now being replaced by Planning Policy Statements.

Planning Policy Statements - replacing Planning Policy Guidance Notes. They set national planning policy and are backed up by best practice guidance on how they should be used.

Planning Portal - A national website provided by the government for members of the public, local planning authorities and planning consultants. The Planning Portal features a wide range of information and services on planning.

Previously Developed Land - see Brownfield above.

Public Open Space - areas of formal or semi-formal space protected by Local Planning Authorities for recreation.

Q

R

Renewable Energy - energy generated from resources that are unlimited, rapidly replenished or naturally renewable such as wind, water, sun, wave and refuse, and not from the combustion of fossil fuels.

Regeneration - social, economic and environmental improvement of urban or rural areas.

Regional Planning Body - the body responsible for planning at a regional level. In the South West, this is South West Councils. It used to be known as the South West

Regional Assembly.

Regional Spatial Strategies - a planning strategy for the whole region prepared by the Regional Planning Body. The decision to publish the final Regional Spatial Strategy is made by the Secretary of State. The Regional Spatial Strategy sets out broadly where development will take place across the region, including setting housing and employment figures. Local Planning Authorities have to produce plans that are in "general conformity" with the Regional Spatial Strategy.

S

Secretary of State - the Government minister responsible for Communities and Local Government. They have the final say on the publication of the Regional Spatial Strategy.

Section 106 Agreement - Section 106 agreements are legal agreements between a planning authority and a developer, or offers by a developer, that ensure that extra work required to make a development work are undertaken.

Sites of Specific Scientific Interest - a site identified as an area of special interest due to its flora, fauna, geological or landscape features.

Soundness - to be considered sound, a Development Plan Document must be justified and effective. The "Soundness" of a document is tested by the Planning Inspector at the Examination in Public.

South West Region - Gloucestershire is at the very north of the South West Region, which extends from Bournemouth in the south east, to Gloucestershire in the north and Cornwall in the west.

Spatial Planning - spatial planning brings together policies for the development and use of land with other policies and programmes which influence the nature of places and how they work.

Spatial Portrait - a pen picture of the place at the start of the plan period. Says what the place is like now.

Statutory - Required by law.

Strategic Allocation - an area that is allocated in a plan or policy that is vital to its delivery.

Strategically Significant Cities and Towns - cities and towns that are important at a regional level. They have been identified in the Regional Spatial Strategy for the South West as being the main areas for growth in the region.

Strategic Environmental Assessment - a process that assesses whether a plan or policy is likely to have a harmful effect on the environment. It is required by the European Union. It is commonly included in Sustainability Appraisal in England and Wales.

Strategic Flood Risk Assessment - a two stage assessment that looks at the likelihood of an area suffering from flooding. The first stage looks at a wide area, the second at specific vulnerable sites.

Surface Water Management Plan - a plan showing how an area is likely to be affected by surface water flooding and how this could be improved.

Sustainability Appraisal - a process which appraises the social, economic and environmental sustainability of plans and policies brought in by the 2004 Planning and Compulsory Purchase Act. It is common practice to combine this process with Strategic Environmental Assessment (above).

Sustainability Objectives - a set of objectives (see above) set out during the Sustainability Appraisal process that the plan or policy will be measured against.

Sustainable Communities - places where people want to live and work both now and

in the future.

Sustainable Community Strategy - a strategy produced by the Local Strategic Partnership that seeks to create places where people want to live and work.

Sustainable Development - development that meets the needs of today without compromising the needs of tomorrow.

Sustainable Urban Drainage Schemes - a way of ensuring that water does not run-off too quickly from buildings and hard surfaces. It should reduce surface water flooding.

Sustainable Transport - methods of transport that are more efficient than the private car, such as busses and trains or walking and cycling - can also include lift-sharing.

T

Threshold - a point above or below which a policy is applied.

Town Centre Uses - things you would expect to find in a town centre such as shops, leisure uses and offices.

Town and City Centres - normally the main shopping, leisure and office area of a city or town.

Travel to Work Area - indicates the area around a centre where people are reasonably likely to consider commuting from.

U

Urban Extension - a planned expansion of an existing urban area.

Urban Regeneration Company - a body that combines different organisations with the aim of improving an urban area. Gloucester has the only heritage based urban regeneration company.

Urban Sprawl - uncontrolled expansion of the urban area.

V

Viability - whether or not something can be achieved. Often refers to whether or not a development can be a commercial success.

Vision - a pen picture of how the place will look at the end of the plan period. Says what the place will be like in the future.

Vitality - the liveliness of an area.

W

White Land - a general description for an area that is not covered by any planning policies. It is often used to refer to open countryside that is not Green Belt or covered by any other restrictive policy.

X

Y

Z



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