

**GLOUCESTER, CHELTENHAM &
TEWKESBURY JOINT CORE
STRATEGY**

**DRAFT MATTERS AND ISSUES
INCLUDING HEARINGS
PROGRAMME**

**EXAMINATION HEARING SESSIONS
COMMENCE 19th MAY 2015**

Joint Core Strategy Gloucester, Cheltenham, Tewkesbury Initial Matters and Issues

This document lists the matters (topics), and issues (points for consideration), that will form the basis for discussions during the Hearing Sessions and supply the context for any further written statements (see Briefing Notes paragraphs 35 – 39 and Appendix B). Matters and Issues may change as the examination progresses, although representors will be given an opportunity to comment on any new issues that arise. If sufficient information is provided on any particular matters/issues, I may decide not to pursue them further in any depth.

References to the Plan are to the Pre-submission version of the Draft Joint Core Strategy dated June 2014. This is the version which is being examined, as it is the publication version, which has undergone public consultation.

The November 2014 submission version of the Plan contains changes proposed by the Councils, (set out in Appendix 5 to CONS 104) which have not undergone public consultation. I consider that some of these changes go beyond what would fall within the category of minor amendments to the Plan and which the Councils, therefore, have the power to make in due course before the Plan is adopted. Consequently, I intend to consider these more substantial changes during the course of the examination.

Appendix 5 does not give a reference to each of the proposed changes and therefore, I have identified them by reference to the first two columns of Appendix 5 as follows:

maps, multiple; 17, 2.24-2.30; 22, SO7;
29, SP2 numbers – distribution of development; 35, SP2b.

References to the Councils in these matters and issues are to Gloucester City, Cheltenham Borough, and Tewkesbury Borough Councils. Other references used are:
NPPF - National Planning Policy Framework;
PPG - Planning Practice Guidance;
LP Regs – The Town and Country Planning (Local Planning)(England) Regulations 2012

Answers should be supported with reasons, unless exceptionally it is clear from the question that a simple yes or no answer is required. There may be some overlap between questions, in which case answers may be cross referenced as appropriate. Text that may be found in submitted evidence documents or within the Plan itself should not be repeated, but references (with page and paragraph numbers) to those documents should be provided where relevant. Responses to each Matter should be submitted as separate documents.

All questions should be answered by the Councils. Other representors may respond to issues relevant to points they have made in their earlier representations.

The Councils have requested me to recommend whatever main modifications are required to make the JCS legally compliant and sound. Any need for main modifications to particular parts of the JCS will be explored during the course of the Examination, although the wording of some main modifications may not be finalised until after the hearing sessions.

If it is thought that main modifications are required to make the JCS sound and/or legally compliant, such modifications should be suggested in the submitted statements, if possible. Statements of Common Ground should be produced where an agreed position has been reached. A Statement of Common Ground may contain suggested wording for a main modification.

Participants are urged to read the Briefing Note, which has been circulated, and which can be downloaded from the examination website:

<http://www.gct-jcs.org/Examination/Examination.aspx>

Gloucester, Cheltenham and Tewkesbury Joint Core Strategy
Programme, Matters and Issues v1 as at 16th March 2015

Statements should be received by the Programme Officer, Ian Kemp, by the following deadlines:

- 17:00 on Friday 24 April 2015 for matters up to and including 10th June 2015;
- 17:00 on Friday 12th June for all matters scheduled for 7th July 2015 or later.
- Statements of Common Ground will be accepted whenever they become available, but should be submitted by the above dates if possible or at least by the Friday before the relevant hearing session to enable uploading and pre-discussion consideration.

PROGRAMME FOR HEARING SESSIONS

WEEK 1	Location: Council Chamber, Cheltenham Borough Council Offices
Tuesday 19 th May 2015 Day 1 1000 – 1700	Opening Introductions Matter3: Housing Provision
Wednesday 20 th May 2015 Day 2 0930 – 1700	Matter3: Housing Provision Continued
Thursday 21 st May 2015 Day 3 0930 – 1700	Matter3: Housing Provision Continued
Friday 22 nd May 2015 Day 4 0930 - 1330	Reserve
WEEK 2	Location: Council Chamber, Cheltenham Borough Council Offices
Wednesday 3 rd June 2015 Day 5 0930 – 1700	Matter 1: Procedural and Legal Requirements including the Duty to Co-operate

<p>Thursday 4th June 2015 Day 6</p> <p>0930 – 1300</p> <p>1400 - 1700</p>	<p>Matter 1: Procedural and Legal Requirements including the Duty to Co-operate Continued</p> <p>Matter 2: Vision and Objectives</p>
<p>Friday 5th June 2015 Day 7</p> <p>0930 - 1330</p>	<p>Matter 4: Gypsies and Travellers</p>
<p>WEEK 3</p>	<p>Location: Council Chamber, Cheltenham Borough Council Offices</p>
<p>Tuesday 9th June 2015 Day 8</p> <p>0930 – 1700</p>	<p>Matter 5: Employment Land Provision</p>
<p>Wednesday 10th June 2015 Day 9</p> <p>0930 – 1700</p>	<p>Reserve</p>
<p>WEEK 4</p>	<p>Location: Council Chamber, Cheltenham Borough Council Offices</p>
<p>Tuesday 7th July 2015 Day 10</p> <p>0930 – 1700</p>	<p>Matter 6: Spatial Strategy</p>
<p>Wednesday 8th July 2015 Day 11</p> <p>0930 – 1700</p>	<p>Matter 7: Green Belt</p>
<p>Thursday 9th July 2015 Day 12</p> <p>0930 – 1300</p> <p>1400 - 1700</p>	<p>Matter 8: Strategic Allocations – Innsworth</p> <p>Matter 8: Strategic Allocations – North Churchdown</p> <p>Matter 8: Strategic Allocations – South Churchdown</p>

Friday 10 th July 2015 Day 13 0930 – 1330	Matter 8: Strategic Allocations – North Brockworth
WEEK 5	Location: Council Chamber, Cheltenham Borough Council Offices
Tuesday 14 th July 2015 Day 14 0930 – 1300 1400 - 1700	Matter 8: Strategic Allocations – North West Cheltenham Matter 8: Strategic Allocations – MOD Ashchurch Matter 8: Strategic Allocations – Ashchurch
Wednesday 15 th July 2015 Day 15 0930 – 1700	Matter 8: Strategic Allocations – Leckhampton
Thursday 16 th July 2015 Day 16 0930 – 1300 1400 - 1700	Matter 9: Omission Sites - Gloucester Matter 9: Omission Sites – Cheltenham Matter 9: Omission Sites – Tewkesbury
Friday 17 th July 2015 Day 17 0930 – 1330	Matter 13: Other Sustainable Development Policies
WEEK 6	Location: Council Chamber, Cheltenham Borough Council Offices
Tuesday 21 st July 2015 Day 18 0930 - 1700	Matter 10: Infrastructure (excluding Transport and Water Management)
Wednesday 22 nd July 2015 Day 19 0930 - 1700	Matter 11: Transport

Thursday 23 rd July 2015 Day 20 0930 – 1300 1400 – 1700	Matter 12: Water Management and Flood Risk Matter 14: Monitoring and Review
Friday 24 th July 2015 Day 21 0930 – 1330	Reserve

INSPECTOR’S MATTERS AND ISSUES FOR DISCUSSION

WEEK 1 19TH – 21ST MAY 10.00 – 17.00

Matter 3: Housing Provision

Issue: Whether the Objectively Assessed Needs are soundly based and whether the Plan makes adequate provision to meet them

Policy SP1 – *The Need for New Development*
Policy SP2 – *Distribution of New Development*

Need

1. What is the estimated population increase over the Plan period for each of the Councils and for the JCS area as a whole? What assumptions have been used in calculating the figures and are they justified? How do the figures compare with ONS projections?
2. What are the full objectively assessed needs (OANs) for a) market housing and b) affordable housing in the housing market area? How does this translate into a requirement for each Council area and the JCS area as a whole? Should Policy SP1 state the quantity of affordable housing needed?
3. Is there a robust statistical and methodological basis for the OAN figures that underpin the Plan? Are the assumptions reasonable? How do the figures compare with DCLG household projections including the recently published 2012-based projections? How should the latter be taken into account? Is a housing provision figure of 30,500, based solely on demographic projections with a partial return to trend for household formation rates in the 25-34 age group, justified?
4. Does the OAN take appropriate account of economic factors and the relationship with the economic strategy of the Plan? Why would it be justified to choose a housing provision figure at the lower end of the evidence base range (30,500 dwelling) whilst choosing an employment growth figure (28,000 jobs) at the higher end of the evidence base range? Would it be more appropriate to plan for a greater number of dwellings to take account of the proposed growth in employment? (NPPF paragraph 158).
5. In preparing the Plan, how have the Councils satisfied the NPPF paragraph 159, which says that Councils should prepare Strategic Housing Market Assessments (SHMAs) which assess the full housing needs for market and affordable housing, working with neighbouring authorities where housing market areas cross administrative boundaries?

6. Is the *Strategic Housing Market Assessment for Gloucestershire*, March 2014, (the 2014 SHMA) the most up-to-date SHMA available and will any update be submitted during the examination?
7. Is there a clear and justified basis for the identification of the HMA in the 2014 SHMA and has this HMA been used to inform the JCS? Does the JCS administrative area form part of the county wide Gloucestershire HMA? If the HMA used to inform the Plan is the county wide Gloucestershire HMA, should any re-assessment have been carried out for the JCS area only and, if so, has this been done?
8. What methodologies and assumptions have been used in the 2014 SHMA and do they provide a consistent approach for each Council? Are the methodologies justified?
9. Has the 2014 SHMA determined the OAN for housing in the JCS area or has it simply relied on figures contained in reports commissioned by the JCS Councils? Please explain exactly whether, and if so how, figures in these reports have been analysed by the SHMA, referencing each report. Explain how this approach may be justified with reference to the NPPF and the PPG.
10. Explain how the needs of different groups in the community have been addressed such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes. What conclusions does the 2014 SHMA reach in terms of the scale and mix of housing type needed, including terms of tenure and size? (NPPF Paragraph 159)
11. Detail how any cross-boundary housing requirement issues have been addressed (NPPF paragraph 179).
12. Explain what other levels of housing provision have been considered for the Plan period and why they have been rejected (until relatively recently, the evidence base seemed to suggest housing provision in the range of 33,200 to 37,400 dwellings). Respond to the alternative estimates of housing requirements put forward by other participants, including the methodologies and assumptions used. Explain how sustainability appraisal has been used to support the scale of provision in the Plan.

Supply

13. Explain how the Plan meets the full OANs for market and affordable housing in the housing market area, including identifying a supply of specific, deliverable sites sufficient to provide 5 years' worth of housing and identifying a supply of specific, developable sites or broad locations for housing for years 6-10 and, where possible, for years 11-15(NPPF paragraph 47).
14. Explain how the Councils have addressed any shortfall in housing provision both during and before the current Plan period, including how it has assessed whether the 5% additional buffer is appropriate or whether there has been persistent under-delivery of housing sufficient to justify a 20% additional buffer of housing provision (NPPF paragraph 47).
15. Explain paragraph 10.4 of the Housing Background Paper, November 2014, (ETOP101a). For Tewkesbury, is it a correct approach to have a 20% buffer for the early part of the Plan period and a 5% buffer for subsequent years, as stated therein? Should the buffer be one adjustment only? As this is a JCS, should the housing numbers for the three Councils be assessed together or separately?
16. Explain how an allowance for windfall sites has been made in the 5 year housing land supply, and whether there is any compelling evidence to justify the approach to making an allowance for future windfall sites (NPPF paragraph 48).
17. Explain how the Councils have prepared Strategic Housing Land Availability Assessments (SHLAAs)/Strategic Assessments of Land Availability (SALAs) addressing the need for all types of housing over the Plan period. Do they establish realistic assumptions about the availability, suitability, deliverability and likely economic viability of housing land? (NPPF paragraph 159)
18. Is the evidence base robust, adequate and up-to-date? (NPPF paragraph 158)

19. Explain how specific SHLAAs/SALAs have informed the JCS and how they have identified each allocated site. Are these documents subject to annual review and when are updates expected?
20. Paragraph 3.2.6 of the Plan states that the JCS has been informed by the SHLAA process "*...although this does not consider all constraints which could prevent sites coming forward.*" What constraints has the SHLAA process not considered and how does this affect its reliability? In these circumstances are the SHLAAs sufficiently robust to inform strategic allocations?
21. Explain how the Plan illustrates the expected rate of delivery of market and affordable housing through housing trajectories for the Plan period and sets out a housing implementation strategy for the full range of housing, including maintaining a 5 year supply of housing land to meet housing targets. Are the trajectories for each of the districts realistic? Should they be included in the Plan as well as the evidence base (NPPF paragraph 47)?
22. Confirm the contribution (in numbers and percentages) the strategic allocations are proposed to make to the housing supply in years 1-5, 6-10 and 11-15 (NPPF paragraph 47, 3rd bullet point). Is this realistic and deliverable?
23. Confirm the contribution (in numbers and percentages) the district allocations are proposed to make to the housing supply in years 1-5, 6-10 and 11-15. Is this realistic and deliverable?
24. Confirm the contribution (in numbers and percentages) the commitments/completions are proposed to make to the housing supply in years 1-5, 6-10 and 11-15. Is this realistic and deliverable?
25. Confirm the contribution (in numbers and percentages) that other sources of housing supply are intended to make in years 1-5, 6-10 and 11-15. Is this realistic and deliverable?
26. Paragraph 3.2.8 of the Plan seems to introduce uncertainty over housing deliverability where it states with respect to district plans "*..there is some uncertainty as to how many homes will eventually be allocated and when they will be delivered. In total, these sources of land supply are thought to be able to provide for just over 62% of the identified need....*". Please explain.
27. Paragraph 3.1.16 of the Plan indicates that an early review of the Plan may be required. Is there a need for a firm commitment to review within five years? If needed, could this ensure that the housing provision part of the Plan is sound and, if so, in what way? (PPG ID 12-008-20140306)

Policies SD11 – Residential Development and SD12 – Housing Mix and Standards

28. Explain how these Policies are fully compliant with the NPPF and the PPG.

Policy SD13 – Affordable Housing

29. Explain what viability evidence there is (and provide a copy) to justify the affordable housing contributions of 20% for 5-9 units/ 0.2 hectares or more, and 40% for 10 or more units/0.4 hectares or more.
30. Explain how the Policy is justified, particularly with respect to the site-size threshold of 5-9 dwellings, having regard to the NPPF and the PPG as recently amended.

Participants (subject to confirmation)

WEEK 2 3RD JUNE 09.30 – 17.00 & 4TH JUNE 09.30 – 13.00

Matter 1a: Duty to Co-operate (DtC)

Issue: Has the DtC been met?

31. Has the Plan taken account of the local plans, emerging local plans, management plans and strategies of neighbouring council, and other relevant agencies/bodies?
32. Explain how the DtC has been met with respect to all relevant bodies set out in LP Regs, including the Gloucestershire First Local Enterprise Partnership (G First LEP).
33. With respect to all Local Authorities in the Gloucestershire Housing Market Area (HMA), explain how the DtC has been met as advised in the PPG (ID 2a-010-20140306 & 2a-018-20140306).
34. Explain how the DtC has been met with respect to the Cotswolds Conservation Board.
35. The DtC Statement (SUB108) Appendix 3 indicates that Gloucestershire County Council (GCC) *"remains keen that further constructive engagement take place..."* Please explain what this refers to and whether the DtC has been met with respect to GCC.
36. The DtC Statement Appendix 4 indicates that there may be some DtC issues with the following organisations: Environment Agency (EA), Gloucestershire Airport, MOD Ashchurch, English Heritage (EH), Natural England (NE), Sport England and Stagecoach. Is there sufficient evidence to conclude that the DtC has been met with respect to these bodies?
37. Is the list of "Themes" in Appendix 5 of the DtC Statement a comprehensive list of cross-boundary strategic matters to which the DtC applies?
38. Overall, having regard to the requirements of Section 33A of the Planning and Compulsory Purchase Act 2004, paragraph 4 of the Local Planning Regulations 2012, and paragraph 2 of the Local Planning (Amendment) Regulations 2012, has the DtC been met?
39. Please provide and list (in 3 sections) all signed a) Statements of Co-operation, b) Memoranda of Understanding and c) Statements of Common Ground. List any others that are expected to be forthcoming and state when they are expected. The Statement of Co-operation with Stroud was signed when 33,200 new dwellings were proposed. Is there an updated version?

Matter 1b: Other Legal and Procedural Requirements

Issue: Whether the Plan meets all other relevant legislative requirements

40. Compliance with **Section 19 of the Planning and Compulsory Purchase Act 2004, as amended:**
 - i. **(1)** Has the Plan been prepared in accordance with the Local Development Schemes (LDSs)? Do any parts of the LDSs require updating and, if so, when will this be done?
 - ii. **(2)(a)** Does the Plan have regard to national policies and advice contained in current guidance issued by the Secretary of State?
 - iii. **(2)(h)** Does the Plan have regard to all other relevant development documents adopted by the Councils?
 - iv. **(3)** Has the Plan been prepared in compliance with the Statements of Community Involvement?
 - v. **(5)(a)&(b)** Is the Sustainability Appraisal adequate and does it fully appraise all alternative options considered and clearly indicate why preferred options have been chosen, including mitigation measures? Are reasons for rejecting reasonable alternatives set out? Are there any outstanding issues relating to Sustainability Appraisal?

41. Has **Part 6 of the Conservation of Habitats and Species Regulations 2010** been complied with and are there any outstanding issues? Are NE and other relevant bodies satisfied with the Plan's approach including any potential impact from strategic allocations?
42. Has the public sector equality duty been complied with in accordance with the **Equality Act 2010**?
43. Reg 8(5) of the LP Regs requires the Plan to identify superseded policies from the adopted development plan. There is no indication in the Plan of what policies it supersedes, although document SUB 107 provides details. How will this be rectified?
44. NPPF paragraph 153 states that each local planning authority should produce **a** (my emphasis) Local Plan for its area. Whilst this can be a joint document, as the JCS is, any additional Local Plans, such as site allocations, should be clearly justified (PPG ID 12-012-20140306). What is the justification for the JCS only providing the higher level strategic part of the development plan for the area and deferring other matters to district plans?
45. Does the Policies Map illustrate the appropriate information?
- Are all relevant land-use designations shown on the Policies Map (NPPF paragraph 157, 4th bullet point)?
 - Should there be a map showing where development would be inappropriate because of, for example, its environmental or historic significance (NPPF paragraph 157, 7th bullet point)?
 - Should the Policies Map show waste allocations as indicated in the DtC Statement (SUB 108) Appendix 5?

Participants (subject to confirmation)

WEEK 2 4TH JUNE 14.00 – 17.00

Matter 2: Vision and Objectives

Issue: Whether the identified Vision and Objectives are the most appropriate for the Plan area

46. Does this part of the Plan identify all key challenges/issues facing the area and are they addressed by the vision and objectives?
47. Have all reasonable alternative options been considered in developing the vision and objectives?
48. What evidence is there to demonstrate how the chosen vision and objectives were arrived at?
49. Do the vision and objectives reflect the three dimensions of sustainable development (economic, social and environmental)?
50. Are all of the objectives followed through into the Plan's policies?

Participants (subject to confirmation)

WEEK 2 5TH JUNE 09.30 – 13.30

Matter 4: Gypsies and Travellers including Travelling Show-people (G&Ts)

Issue: Whether the Plan makes adequate provision for Gypsies and Travellers including Travelling Show-people

Policy SD14 - Gypsies, Travellers and Travelling Show-people

51. Explain how the assessment of need in the *Gloucestershire Gypsy, Traveller and Travelling Show-people Accommodation Assessment* (October 2013) is based on up-to-date and robust evidence and how the approach used is justified.
52. Explain and justify how the Plan deals with pitch targets for gypsies and travellers and plot targets for travelling show-people in accordance with *Planning Policy for Traveller Sites* (PPTS) Policy B, paragraph 8.
53. Explain what the site requirements are to meet the needs set out in table C4- *Permanent Gypsy and Traveller Pitch Requirements*.
54. Explain how an identified five year supply of specific, deliverable sites can be demonstrated (PPTS paragraph 9(a)).
55. Explain how an identified supply of specific, developable sites or broad locations for growth for years 6-10 can be demonstrated and, if possible for years 11-15 (PPTS paragraph 9(b)).
56. If 5 years of deliverable sites and developable sites/broad locations for years 6-10 cannot be demonstrated, how do the Councils propose to address the situation?
57. Policy SA1: *Strategic Allocations* at clause 4 states "*Proposals will be required to demonstrate how the provision of New Gypsy, Traveller and Travelling Show-people sites will be incorporated into development proposals for Strategic Allocations*". Explain how much of the identified G&T accommodation need is intended to be met on strategic sites and whether all strategic sites are intended to provide some G&T accommodation.
58. PPG ID 12-010-20140306 (relating to NPPF paragraph 156) states that "*Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the 'what, where, when and how' questions)*". Explain how the Plan answers the "*what, where, when and how*" questions for G&T accommodation.
59. The statement at JCS paragraph 4.14.7 that "*It may be possible for sites for traveller communities to be provided as part of well master-planned Strategic Allocations*" is vague. G&T sites cannot be allocated through master-planning. Therefore, how can this be justified?
60. In the light of the above mentioned PPG advice should the indicative site layouts provide details of required G&T provision and if not, why not?
61. Is provision on strategic housing sites the most appropriate strategy for meeting G&T accommodation needs?
62. Given the level of identified need, should specific strategic sites be allocated for a) gypsies and travellers and b) travelling show-people in the JCS? If so, would this necessitate any further amendments to the proposed Green Belt review (taking account of PPTS Policy E)? If not, why not?
63. Is it justified and in accordance with national policy to leave pitch and plot allocations to the district plans? Please explain.
64. Explain how the criteria in Policy SD14 are the most appropriate for a) allocations and b) speculative applications.
65. Explain how the JCS meets the Public Sector Equality Duty for G&Ts. Include an explanation of how the JCS meets the requirements set out in the case of *Moore & Anor v SSCLG* EWHC 44.
66. The DtC Statement (SUB 108) at Appendix 5 indicates that a call for G&T sites has been made. What is the current situation on this?

67. Explain what options were considered for G&T provision and why the chosen option was taken forward. Explain with references and conclusions the role played by sustainability appraisal.

Participants (subject to confirmation)

WEEK 3 9TH JUNE 09.30 – 17.00

Matter 5: Employment Land Provision

Issue: Whether the Objectively Assessed Needs are soundly based and whether the Plan makes adequate provision to meet them

68. Explain how the Councils have identified the requirement for new employment land, including assessing the needs for land and floor-space to meet the requirements of businesses. How does the evidence base address the quantitative and qualitative aspects of employment land provision? Why was a jobs figure at the higher end of the evidence base range (21,800-28,200) chosen? Is the provision of about 64 hectares of employment land justified? (NPPF paragraphs 21& 160-161)

69. Is the evidence base robust, adequate and up-to-date? (NPPF paragraph 158)

70. Explain how the Plan sets out a clear economic strategy which positively and proactively encourages economic growth (NPPF paragraph 21).

71. Explain how the Plan takes account of the Strategic Economic Plan (SEP) 2015 to 2021 of the G First LEP. How many jobs does the SEP seek to generate each year and how many in total would this amount to if extrapolated over the Plan period? Please justify any significant divergences from the SEP in the JCS. (NPPF paragraph 160)

72. Explain how the Plan has considered the relationship and balance between new housing and employment development so as to prevent any lack of housing being a barrier to investment. How many jobs will the planned provision of dwellings support and what is the evidence for this? (NPPF paragraph 160)

73. Explain how the future provision of employment land will be delivered effectively within the Plan period, including existing commitments and future development proposals. Is the delivery of sufficient land to support 28,000 jobs realistic? What is the proposed timeline for delivery of employment development?

74. Explain the role SALAs have played in identifying employment land for allocation.

75. Explain what options were considered for the overall provision of employment land and why the preferred option was chosen. Explain how sustainability appraisal has been used to support the scale of provision in the Plan.

Policy SD2- Employment

76. Paragraph 4.2.2 states that this policy covers job-generating uses such as business, industry and tourism and that shopping and other A class uses are covered by Policy SD3. Explain what spatial guidance there is for other non-residential uses, including those that are within use class D.

77. Explain how the locational provisions are justified.

78. Explain how the Policy takes accounts of the G First LEP's SEP.

79. Explain how the Policy is fully compliant with the NPPF and the PPG.

Policy SD3 – Retail Hierarchy

80. Explain why it is justified to defer the definition of town centre boundaries and primary and secondary frontages to district plans and why these are not considered to be strategic matters for the JCS.
81. Explain why it is justified to defer all retail allocations to district plans and how the limited detail in the JCS conforms to the NPPF paragraph 154, particularly with respect to providing clarity on what will or will not be permitted and where. Does the policy provide sufficient direction on the form, scale, access and quantum of development that might be permitted?
82. Explain how the overall quantum, type and location of floor space requirements in the table are justified.
83. Explain how the Policy is fully compliant with the NPPF and the PPG.

Participants (subject to confirmation)

WEEK 4 7TH JULY 09.30 – 17.00

Matter 6: Spatial Strategy

Issue: Whether the Spatial Strategy is justified

84. Explain why the strategy of concentrating new development in and around the urban areas of Gloucester and Cheltenham is the most appropriate and justify the strategic urban extension approach.
85. Explain how the proposed distribution of development, including the extensions around Tewkesbury town, is consistent with the Gloucester and Cheltenham urban strategy.
86. With respect to Policy SP2, clause 5, is it proposed that all non-strategic allocations in Tewkesbury will be made at service centres and service villages via the Tewkesbury Borough Plan and Neighbourhood Plans?
87. Should the JCS identify broad locations for district plan housing and employment land allocations?
88. Explain how the JCS provides sufficient guidance to direct district plan housing/employment/other land allocations.
89. How do existing district plan allocations fit into the strategy?
90. Is the Plan's approach to identifying service centres and service villages the most appropriate?
91. Is the settlement hierarchy in Table SP2c the most appropriate and specifically are the identified service villages justified?
92. The note to Table SP2C indicates that the service village classification was informed by the 2013 Settlement Audit, which will be reviewed. Has the review taken place? If so, please provide a copy and state what the outcomes are and how they impact on the Plan.
93. What other spatial strategy options were considered and why were they rejected? Explain how sustainability appraisal was used in the process.

94. The evidence base suggests alternative overall housing provision figures, including a range between 33,200 dwellings and 37,400 dwellings. Explain whether the spatial strategy is sufficiently robust to accommodate these higher figures. If it is not, at what higher level of development would it become a totally different strategy?
95. Is the Plan's strategic approach robust and pragmatic and sufficiently flexible to accommodate all reasonable and foreseeable eventualities and changing circumstances?
96. At what level would any adverse impacts of providing a higher level of housing significantly and demonstrably outweigh the benefits (NPPF paragraph 14)? Explain.

Participants (subject to confirmation)

WEEK 4 8TH JULY 09.30 – 17.00

Matter 7: Green Belt

Issue: Whether the Green Belt Review is justified

97. Confirm whether any additions are proposed to the Green Belt.
98. Does the use of Green Belt land for allocations satisfy the "exceptional circumstances" test? What do the Councils believe are the exceptional circumstances that justify releasing land from the Green Belt?
99. Explain how the proposed quantum/scale of land proposed to be taken out of the Green Belt is justified.
100. Has the *Joint Core Strategy Green Belt Assessment* of September 2011 (the Amec report) used the most appropriate methodology?
101. Paragraph 4.1 of the Amec Report states that there are certain Green Belt areas, which do not need to be considered in detail. Is this justified? Does this amount to a selective review of the Green Belt and is the review sufficiently comprehensive?
102. The Amec report assesses the relative importance of strategic segments of Green Belt land in meeting the purposes of the Green Belt (now set out in NPPG paragraph 80). It does not consider other land use planning matters such as landscape, sustainability etc. Paragraph 4.6.5 of the Plan refers to an "alternative approach" being taken forward. Explain this alternative approach to the strategic segments assessment.
103. Explain how the revised Green Belt boundaries have been determined?
104. Are the proposed boundaries the most appropriate and what evidence is there to demonstrate this?
105. Explain how the evidence base, including the Amec report, is up-to-date, robust and fit for purpose.
106. Having regard to their intended long term permanence, explain why it is believed the proposed Green Belt boundaries will be capable of enduring beyond the Plan period.
107. Explain whether, in the Councils' opinion, the extent of the existing designated Green Belt in the JCS area reduces the Councils' obligation to meet their OANs (NPPF paragraph 14).

108. Explain what alternative Green Belt options were considered and why they were rejected. Explain how sustainability appraisal has influenced the chosen option.

Strategic Allocations and other areas removed from the Green Belt

109. Explain what the evidence base is for removal of the proposed areas of land from the Green Belt and confirm that it is adequate, up-to-date and relevant.

110. With reference to a Plan identifying each area of land proposed to be taken out of the Green Belt state what Amec segments each area is in and its overall "traffic light" contribution.

111. Explain how each parcel of land proposed for removal from the Green Belt impacts on the five purposes of the Green Belt.

112. Specifically, with respect to allocation A1 confirm whether Innsworth and Gloucester will be merged and, if so, whether this is justified.

113. Specifically, with respect to allocation A3, confirm whether Churchdown and Gloucester will be merged and, if so, whether this is justified.

114. Identify any other villages that would be merged as a result of the strategic allocations and explain why this is justified.

115. For each area of land proposed to be taken out of the Green Belt explain what aspects of the land and what other considerations amount to the required exceptional circumstances. For the purposes of this exercise, please treat areas of land outside the proposed allocations as separate areas even if they adjoin an allocation.

116. Explain why land that is not allocated and not safeguarded is proposed for removal from the Green Belt. For each such land parcel (Shurdington, South West Cheltenham & North Gloucester) explain precisely what the exceptional circumstances are to justify this.

Policy SD6: Green Belt

117. Briefly explain how the policy provisions for Gloucestershire Airport, Cheltenham Racecourse and the waste management sites allocated in the Gloucestershire Waste Core Strategy are justified.

118. Plan paragraph 1.28 sets out the Plan's response to delivery problems, including the early release of safeguarded land. Should the Plan make it clear that safeguarded land is not allocated for development at the present time? (NPPF paragraph 85, 4th bullet).

119. Explain how the policy provision and criteria for release of safeguarded land are justified, indicating what the triggers would be for release and review of the JCS.

120. The DtC Statement (SUB 108) at Appendix 4 seems to indicate that the early release of "safeguarded land at M5 junction 10" is agreed in principle with the G First LEP and that triggers for early release are being discussed. Please explain. As this will need to be by way of a Plan Review, when is such a review envisaged?

Participants (subject to confirmation)

Matter 8 - Strategic Allocations

Issue: Whether the proposed allocations are the most appropriate and whether they are sufficient, suitable and adequately flexible to meet identified need. Whether the form, scale,

access, quantum and phasing of development envisaged during the Plan period on the strategic allocations is deliverable.

Policy SA1: Strategic Allocations Policy

The following questions relate to each site which will be considered separately in the programme.

121. The NPPF indicates (paragraph 157, 5th bullet point) and the PPG states (ID 12-010-20140306) that "*Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the 'what, where, when and how' questions).*" The indicative layouts in the Plan lack detail. Explain how it is possible to reasonably know whether these allocations are justified when little detail is presented, and infrastructure such as primary access routes are not shown.

122. Whilst Plan Policy SA1, clause 3 states that proposals must be accompanied by a comprehensive master-plan, is it appropriate, in the light of the above PPG advice, to defer important details, such as primary access routes, to an un-examinable master-plan? Should it not be for the Plan itself to set out the appropriate level of land use detail? Please comment on whether the effect of LP reg 5(1)(a)(ii)&(iv) in conjunction with reg 6 (which directs site allocation statements and policies to local plans) is to direct the main allocation details to the Plan and not to deferred master-plans.

123. Page 145 of the Plan states that indicative site layouts have not been revised and more indicative and diagrammatic place-shaping layouts will replace them. Please comment on whether replacement illustrative plans should be produced containing more detail.

124. Plan paragraph 6.1.4 identifies specific requirements for Strategic Allocations including the provision of new local centres. Explain whether these centres should be indicated on the illustrative plans.

125. Should there be allocation policies for each site in order to provide certainty and direction? The draft consultation version of the JCS (October 2013) contained a policy for each strategic allocation. Why were these policies removed and should a policy for each site be re-instated?

126. The strategic allocation red line plans show flood zone 3, AONB and SSSI constraints. Should any other significant constraints (ecological/heritage/mineral/other), if present, be mapped and/or contained in allocation policies? If not, why not?

127. Overall, does Policy SA1 provide sufficient detail to guide developers? Are the '*what, where, when and how*' questions adequately answered for each of the strategic allocations?

128. With reference to viability assessment, explain the approach that has been taken to assessing site viability and whether this is justified.

129. Explain how the allocations reflect the Plan's vision and objectives.

130. Whilst it is acknowledged that the *Strategic Allocations Report* October 2013 (EBLO 102) covers a certain level of information, for each of the above sites please provide brief details of the following:

Site Capacity

131. What is the site area and the area available for development?

132. What is the proposed density for residential development?

133. With respect to Table SA1, what quantity of a)market dwellings and b)affordable homes are proposed. Should indicative figures for each be set out in the Plan? If not, why not?

134. How many gypsy and traveller and travelling show people pitches and plots are proposed?

135. What approximate numbers of jobs are expected to be supported by development on the areas of employment land proposed in Table SA1?

136. What types of employment/use classes are likely to be suitable on the allocated sites? Should they be indicated in the Plan? If not, why not?

137. What contribution will the site make to identified need?

Constraints

138. Explain whether there are any significant land use constraints on the site and how it is envisaged such constraints will be overcome.

139. With reference to the *Landscape Characterisation Assessment and Sensitivity Analysis* (Sept 2013), explain what capacity the land has to accommodate the proposed development in terms of landscape sensitivity.

140. Explain whether best and most versatile agricultural land will be lost and, if so, of what grades (give approximate proportions of each grade for the site).

141. Explain whether there are any features on the site, including heritage assets, which require preservation/protection, and broadly how it is envisaged this will be achieved.

142. Explain whether there are landscape/ecological/other designations which are likely to be adversely impacted by the proposed development on the site and, if so, how it is envisaged this will be dealt with.

Infrastructure (excluding transport and water management/flood risk)

143. With reference to the evidence base, explain what key infrastructure requirements there are, including green infrastructure and social and community infrastructure and what certainty there is that they will be delivered.

Transport

144. Explain what access links will be required and how the required infrastructure will be funded. Explain what certainty there is that the required infrastructure will be delivered.

145. Explain what access options have been considered and why the preferred options have been chosen.

146. With reference to the transport evidence base, explain how traffic impacts have been assessed (amenity/pollution/highway capacity/other).

Water Management and Flood Risk

147. Where flooding is a constraint, with reference to a plan, indicate the range of flood risk zones for the site. Indicate whether development on the site is likely to impact on flood risk elsewhere, and if so, in what way. Explain how flood risk will be overcome. Does the EA object to any proposed allocations on the ground of flood risk and, if so, on what basis?

Deliverability/justification

148. How can the Councils be sure that the overall quanta of housing and employment development set out in Table SA1 will be delivered?

149. Provide details of any applications for planning permissions for development and the current situation.
150. Give details of the grant of any planning permissions and the current situation.
151. Plan paragraph 3.2.15 "[recognises] that there are some outstanding issues which need to be resolved on some sites." Which sites are these? Explain the issues and how it is proposed they will be resolved.
152. Confirm the contribution (in numbers and percentages) each allocated site is intended to make to the five years' worth of supply.
153. Are there reasonable prospects that each allocated site will deliver sufficient housing at a sufficient rate to satisfy its contribution to the five year supply?
154. Provide an approximate timeline, including phasing, for delivery of development at each site.
155. Explain, with reference to viability assessment, how the site is considered to be viable.
156. Explain what aims/outcomes each site seeks to achieve.
157. Overall, is the site allocation justified? Give reasons.

WEEK 4 9TH JULY 09.30 – 13.00

Strategic Allocations - Gloucester

Site A1 – Innsworth

Participants (subject to confirmation)

Site A2 – North Churchdown

Participants (subject to confirmation)

WEEK 4 9TH JULY 14.00 – 17.00

Site A3 – South Churchdown

Participants (subject to confirmation)

WEEK 4 10TH JULY 09.30 – 13.30

Site A4 – North Brockworth

Participants (subject to confirmation)

WEEK 5 14TH JULY 09.30 – 13.00

Strategic Allocations – Cheltenham

Site A5 – North West Cheltenham

Participants (subject to confirmation)

WEEK 5 14TH JULY 14.00 – 17.00

Strategic Allocations – Tewksbury

Site A8 – MOD Site at Ashchurch

Participants (subject to confirmation)

Site A9 – Ashchurch

Participants (subject to confirmation)

WEEK 5 15TH JULY 09.30 – 17.00

Site A6 – South Cheltenham – Leckhampton

Participants (subject to confirmation)

Matter 9: Other Potential Strategic Allocations

Issue: *If any of the proposed strategic housing/employment allocations were found to be unsound in whole or in part, and/or the OAN for housing was found to be higher than stated in the Plan, where would additional housing/employment land be allocated to make up the shortfall?*

158. Explain whether it is proposed to use safeguarded land under these circumstances and whether this land would only be released for development relating to Cheltenham (Policy SD: *Green Belt* clause 7iv).

159. Explain what other alternative sites could reasonably be allocated, with reference to the sustainability assessments or in response to representations and including the below mentioned omission sites. Please give reasons along with approximate numbers of houses/area of employment land that could be accommodated and an approximate indication of delivery timescales.

160. Explain what level of assessment has been carried out on these omission sites and with what results, and where this can be found, including reference to sustainability assessment.

161. Would development on any of the below mentioned omission sites or any other above identified, alternative sites cause such adverse impacts as to significantly and demonstrably outweigh the benefits of meeting the OANs for market and affordable housing (NPPF paragraph 14)?

WEEK 5 16TH JULY 09.30 – 14.00

Omission Sites - Gloucester

- *Twigworth parcel of former Innsworth and Twigworth site A1*- What is the justification for removing this part of the site from the strategic allocation?
- *Broad Location G8 – Land at Highnam*
- *Land at Brookthorpe/Whaddon*
- *Land at Hardwick*

Participants (subject to confirmation)

WEEK 5 16TH JULY 14.00 –17.00

Omission Sites - Cheltenham

- *Broad Location C2 – Land to the North of Cheltenham*
- *Broad Location C5 – Land to the West of Cheltenham*
- *Up Hatherley (Former Site A7)* - What is the justification for removing this site from the strategic allocations?

Participants (subject to confirmation)

Omission Sites – Tewkesbury

- *Land at Mitton*

Participants (subject to confirmation)

WEEK 5 17TH JULY 09.30 – 13.30

Matter 13: Other Sustainable Development Policies

Issue: Whether other sustainable development policies are justified.

This section requires information on those sustainable development policies that have not been addressed within other matters.

162. Explain how each of the following policies comply with the NPPF and the PPG and whether they are justified:

- *SD1- Presumption in Favour of Sustainable Development*
Is this Policy necessary?
- *SD4 – Sustainable Design and Construction*
- *SD5 – Design Requirements*
- *SD9 – Historic Environment*
Does EH have any issues with this policy?
- *SD15 – Health and Environmental Quality*

Participants (subject to confirmation)

WEEK 6 21ST JULY 09.30 –17.00

Matter 10: Infrastructure (excluding transport and water management)

Issue: Whether sufficient and justifiable provisions for infrastructure have been made and whether the provisions are deliverable

Gloucester, Cheltenham and Tewkesbury Joint Core Strategy
Programme, Matters and Issues v1 as at 16th March 2015

INF7- Infrastructure Delivery and INF8 – Developer Contributions

General requirements

163. With reference to the Infrastructure Delivery Plan, explain what the key infrastructure requirements are on which delivery of the Plan depends and whether the JCS contains sufficient detail to understand these requirements.
164. Explain who is going to provide this infrastructure and what guarantees have been given by service providers and others.
165. Explain the approximate cost of key infrastructure requirements and how it is envisaged they will be funded. Explain what funding is currently secured and what funding gap remains.
166. Explain how the required infrastructure relates to the anticipated rate and phasing of development.
167. Explain how the G First LEP has been involved in determining key infrastructure requirements and its delivery.
168. Explain what cross boundary infrastructure issues there are and how they have been dealt with. What neighbouring authorities and statutory bodies have been and will be involved in cross-boundary infrastructure issues?
169. Explain what certainty there is that the required infrastructure will be delivered.
170. Explain what the consequences would be of non-delivery of infrastructure and what contingency plans and/or alternative strategies are in place. Is the Plan sufficiently flexible to deal with this?
171. Explain what infrastructure options have been considered and why the preferred approach was chosen. What role has sustainability appraisal played?
172. Explain how the infrastructure provisions of Policies INF7 and INF8 comply with the NPPF and the PPG.

INF4 – Green Infrastructure; Policy SD7 – Landscape; Policy SD8 – The Cotswolds Area of Outstanding Natural Beauty; Policy SD10 – Biodiversity and Geodiversity

173. Plan paragraph 1.10 lists maps that are intended to form the policies map for the JCS. Should they include a map of components of the local ecological network (NPPF paragraph 117, 2nd bullet point)? If so, should the Nature Map referred to in the DtC Statement (SUB 108) Appendix 5 be included?
174. Explain how the Policy provides sufficient protection for the green infrastructure network.
175. Explain how the enhancement of green infrastructure networks will be delivered and the mechanism for ensuring the connectivity and linking referred to in Clause 2 of Policy INF4.
176. Are the strategic green infrastructure routes in Appendix 8 the most appropriate?
177. Explain how it will be ensured that new residential development creates or adds to a need for publicly accessible green space or outdoor space for sports and recreation, as referred to in Clause 2 of Policy INF4.
178. How is “need” determined? Should there be an assessment of the need for open space?

179. Are there any outstanding issues relating to Green Infrastructure? Has the approach to Green Infrastructure been agreed with NE?

180. Explain what cross-boundary issues there are and how they have been dealt with. What neighbouring authorities and statutory bodies have been and will be involved?

181. With respect to Policy SD8 explain how paragraph 4.8.4 sits with the definition of "major development" in *The Town and Country Planning (Development Management Procedure)(England) Order 2010*. Is there any inconsistency with other parts of the Plan such as paragraph 4.4.15? Does paragraph 4.8.4 provide sufficient direction for developers?

182. Explain how each of the above policies, including the Green Infrastructure Policy, complies with the NPPF and the PPG.

INF5 – Social and Community Infrastructure

183. Explain how it is intended the right social and community infrastructure will come forward at the right time and in the right place. What will trigger its provision? How is undersupply of, or need for a facility determined?

184. Explain how the policy complies with the NPPF and the PPG.

INF6 – Renewable Energy and Low Carbon Energy Development

185. Explain how the policy complies with the NPPF and the PPG (particularly PPG Part 5). Are there any conflicts? Should the following be taken into account: a) Best and Most Versatile Agricultural Land, b) aircraft safety including glint and glare from large scale solar arrays?

Participants (subject to confirmation)

WEEK 6 22ND JULY 09.30 –17.00

Matter 11: Transport

Issue: Whether sufficient and justifiable provisions for transport infrastructure have been made and whether the provisions are deliverable

Policy INF1- Access to Transport Network

Policy INF2 - Safety and Efficiency of the Transport Network

186. Explain how proposed development has been supported by a robust transport assessment. Explain how the transport evidence base fully complies with Part 54 of the PPG.

187. Explain how relevant identified sections of the Local Transport Plan relate to the JCS.

188. Are there any outstanding issues relating to highways and transport infrastructure? Do the Highways Agency and/or Highways Authorities have any concerns about the JCS's provisions?

189. The DtC Statement (SUB 108) at Appendix 5 refers to a Local Transport Plan Review with a timeframe of 2013/14. What is the current position with this document? Does it update/replace the Local Transport Plan 2012-2016 referred to on p102 of the JCS? Explain how the Review impacts on the JCS.

190. The conclusion to the executive summary of the *JCS Model Output Report V7*, March 2014 (EINF106(a)), refers to "greater refinement of the transport schemes" being required before "a

preferred transport package is identified within the JCS". What is this "preferred transport package" and where and how is it supported in the evidence base?

191. Explain what options have been considered and why the preferred approach has been chosen. What role has sustainability appraisal played?

192. Explain what cross-boundary issues there are and how they have been dealt with. What neighbouring authorities and statutory bodies have been and will be involved in cross-boundary transport issues?

193. Explain how the transport policies comply with the NPPF and the PPG.

Participants (subject to confirmation)

WEEK 6 23RD JULY 09.30 – 13.00

Matter 12: Water Management and Flood Risk

Issue: Whether the water management provisions are justified and whether the risk of flooding is minimised

Policy INF3 – Flood Risk Management

194. It is noted that a Strategic Flood Risk Assessment (Level 1 & 2) has been undertaken. Should any further work be carried out and specifically, should strategic allocations be reviewed to ensure compatibility with the latest Flood Risk data and modelling as it is indicated Stroud District Council has done (DtC Statement SUB108 Appendix 5)?

195. Are there any outstanding issues relating to water management and the Strategic Flood Risk Assessment? Has the approach to water management been agreed with the EA?

196. Explain how the sequential test and, where appropriate, the exception test has been applied to site selection, taking account of climate change, and how this has influenced site selection.

197. Explain how the Councils can be sure that proposed development will be flood resilient and resistant and safe for its users for the lifetime of the development.

198. Explain how the Councils can be sure that the proposed development will not increase flood risk elsewhere.

199. As flooding from surface water, groundwater, sewers and impounded water bodies can occur in any flood zone, including Flood Zone 1, explain how the Councils have considered these matters and how they have influenced site selection.

200. Explain how drainage issues have been considered and how they have influenced site selection.

201. Explain what cross-boundary issues there are and how they have been dealt with. What neighbouring authorities and statutory bodies have been and will be involved?

202. Explain how the Flood Risk Management Policy complies with the NPPF and the PPG.

Participants (subject to confirmation)

WEEK 6 23RD JULY 14.00 – 17.00

Matter 14 – Monitoring and Review

Issue: Whether the implementation and monitoring arrangements are fit for purpose.

- 203. Is the Plan's approach to monitoring practicable?
- 204. Does it provide for co-operation and participation and are appropriate participants involved?
- 205. Does it provide flexibility and what contingency measures are in place in the event of non-deliverability?
- 206. Are suitable arrangements in place for reviews at appropriate times?

Participants (subject to confirmation)

Elizabeth C Ord

Inspector

16 March 2015