

Gloucester City Plan

Duty to Cooperate Statement

November 2020

1. Introduction

- 1.1. To support the examination of the Gloucester City Plan (GCP) the City Council has produced a statement to demonstrate how it has met its legal duty to cooperate in the production of the plan. It details how the Council has worked collaboratively with neighbouring authorities and other prescribed bodies to ensure that strategic issues have been addressed.
- 1.2. This statement should be read alongside the separate Consultation Statements that have been produced to detail the consultation process undertaken, and feedback received, for the Regulation 19 Pre-Submission plan as well as for the previous Regulation 18 consultations.

2. Legislative and policy framework

- 2.1. The Localism Act 2011 (Section 110), amended the Planning and Compulsory Purchase Act 2004, inserting Section 33A, relating to the Duty to Cooperate. The Duty to Cooperate:
 - Relates to sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a County Council;
 - Required that local authorities set out planning policies to address such issues;
 - Requires that local authorities and public bodies ‘engage constructively, actively and on an ongoing basis’ to develop strategic policies; and
 - Requires local authorities to consider joint approaches to plan-making.
- 2.2. It requires all planning authorities to work with neighbouring authorities and other prescribed bodies when preparing Development Plan Documents regarding ‘strategic matters’. The Duty to Cooperate applies to Local Planning Authorities, County Councils and other Prescribed Bodies.
- 2.3. The National Planning Policy Framework (NPPF) states that local planning authorities have a duty to cooperate with each other and prescribed bodies on strategic matters that cross administrative boundaries. Furthermore, it states that strategic policy-making authorities should collaborate to identify the relevant strategic matters that they need to address in their plans.

3. Joint Core Strategy Authorities

- 3.1. Gloucester City Council works together with Cheltenham Borough and Tewkesbury Borough Councils to produce the Joint Core Strategy (JCS). The JCS provides the overarching strategic plan for the three authorities, setting out growth requirements, the broad spatial strategy, strategic site allocations and other strategic-level planning policies. The current JCS was adopted in

December 2017. A review of the JCS has also now commenced, with the three authorities again working cooperatively together to plan strategically going forward.

- 3.2. This formal arrangement, put in place in 2008, has enabled the authorities to work closely together to address strategic and cross-boundary issues such as housing requirements (including addressing unmet needs), employment needs, infrastructure provision, affordable housing and green belt. The three authorities also worked together in preparing and adopting their CIL charging schedules.
- 3.3. The JCS has therefore addressed most of the strategic issues for Gloucester City Council and as a result, the Duty to Co-operate was met through the Joint Core Strategy. This was confirmed through the JCS Inspector's final report who concluded that the authorities had fulfilled the legal requirements of the duty.
- 3.4. The JCS Duty to Cooperate Statement should be read alongside this statement and has been included at Appendix A.

4. Other Gloucestershire Local Authorities

- 4.1. Gloucestershire is comprised of six local authorities (Cheltenham Borough, Cotswold District, Forest of Dean District, Gloucester City, Stroud District and Tewkesbury Borough) and Gloucestershire County Council.
- 4.2. A well-established county-wide Planning Officers Group meets on a quarterly basis where the seven authorities discuss and cooperate on strategic planning matters affecting the county. All of the authorities have signed a Memorandum of Understanding to accompany this joint working to set out formally how the duty to cooperate will be complied with in respect of strategic planning in Gloucestershire. In addition, the JCS authorities and Stroud District Council have signed a Statement of Cooperation in relation to the unmet needs of Gloucester City and the consideration of different development options that may become available, both within and outside the JCS area. These agreements are included at Appendix A.
- 4.3. The Gloucestershire Economic Growth Joint Committee is a statutory committee made up of the Gloucestershire councils with the purpose of coordinating work to support strategic growth, including supporting the LEP's Strategic Economic Plan and Local Industrial Strategy. In 2019, to more closely align strategic planning in the county and to support the upcoming reviews of the strategic plans (e.g. JCS), the committee established a lead-coordinator role to work with the local authorities to progress a Gloucestershire Statement of Common Ground. The statement will deliver a long term and high-level planning document for the further future growth of the county and will inform the review of the JCS. At the time of writing, officers are working collaboratively to prepare a draft statement. It is anticipated this will be approved by the end 2020/beginning of 2021.
- 4.4. Each of the Gloucestershire authorities and prescribed bodies have been engaged through the different stages of consultation on the GCP prior to the production of the Pre-Submission GCP. Pre-Submission Regulation 19 consultation responses were received from Gloucestershire County Council (various leads), Cotswold District Council and Stroud District Council. A summary

of their responses can be found in the Regulation 22 Statement, prepared in support of Submission. Full details can be found on the examination website.

- 4.5. Objections relating to the Duty to Cooperate were received from the County Council in their capacity as the Minerals and Waste authority. However, Gloucester City Council views these as actually being objections in respect of soundness and a Statement of Common Ground is currently being prepared and consensus reached on how the plan could be amended to satisfy them. These are identified in the Proposed Changes document.
- 4.6. Stroud District Council also made a comment regarding addressing the needs for Gypsies, Travellers and Travelling Showpeople. The City Council, as part of the ongoing duty to cooperate and subsequent to prior engagement on the matter has made a formal request to all Gloucestershire local authorities for support in providing for unmet needs for traveller communities. Across the county there is currently a lack of sites to provide for identified need, and all six authorities have committed to work together to undertake (1) a review of accommodation needs and (2) a comprehensive analysis of site opportunities. At the time of writing, this work is being progressed. The meeting notes from recent County Planning Officer Group are provided at Appendix B, which demonstrate the engagement and commitment from the authorities.
- 4.7. In relation to Local Plan reviews, the JCS authorities are working proactively and on an ongoing basis with the other district authorities in Gloucestershire in addressing strategic planning matters. This includes opportunities in Stroud District for example, where a site known as 'Land at Whaddon' has been identified in the Local Plan Review as an opportunity for Gloucester City's development needs, should it be required and in accordance with the emerging JCS Review spatial strategy.
- 4.8. Gloucestershire County Council (GCoC) as Education Authority submitted a comment in relation to developer contributions towards strategic infrastructure. Since the GCP was approved and consulted upon, the GCoC have updated the Pupil Product Yields (PPY), which set out the number of pupils expected from new development and a headline cost for the provision of a school place for the different categories of education provision (early years, primary, secondary and post-16). These figures were included as part of the GCoC Local Developer Guide Refresh in April 2020, and it is understood this will be put to GCoC Cabinet for adoption in January 2021.
- 4.9. In addition, in September 2019, the Community Infrastructure Levy (CIL) Regulations were amended so as to remove the 'pooling restriction' for S106, meaning that large off-site infrastructure can be funded from multiple contributions as long as the Regulation 122 tests can be met.
- 4.10. The result of these matters (as set out in the comment) is that the education infrastructure costs included in the GCP Infrastructure Delivery Plan (IDP) were out of date, and the GCP Viability Appraisal (VA) did not reflect the funding mechanism for education infrastructure.
- 4.11. With this in mind, the City Council has undertaken further work, in collaboration with GCoC to (1) amend the GCP IDP to update the education requirements arising from planned growth in Gloucester City; (2) update the GCP VA to reflect the additional costs of education infrastructure and test different scenarios with the aim of releasing additional headroom, which can be provided

as developer contributions for infrastructure. These are published as Addendums to the original assessments and the overall conclusions set out in the Infrastructure and Viability Background Paper (November 2020).

5. Local Authorities Outside Gloucestershire

- 5.1. Gloucester City does not share a boundary with any Local Authority outside of Gloucestershire. With regards to the Pre-Submission Regulation 19 consultation, a response was received from the South Worcestershire Authorities. This did not raise Duty to Cooperate concerns and the issues of soundness raised are detailed in the Regulation 22 Consultation Statement and the full database of responses.

6. Prescribed Bodies

- 6.1. In addition to the local authorities set out above, Gloucester City is required to engage with other prescribed bodies as set out through the Town and Country Planning (Local Planning) (England) Regulations 2012. The prescribed bodies that are relevant to Gloucester City are:

- Environment Agency
- Historic England
- Natural England
- Civil Aviation Authority
- Homes England
- Gloucestershire NHS Foundation Trust
- Gloucestershire Clinical Commissioning Group
- Office of Rail and Road
- Highways England
- Marine Management Organisation
- Gloucestershire GFirst Local Enterprise Partnership
- Gloucestershire Local Nature Partnership
- Cotswold Conservation Board

- 6.2. Each of the prescribed bodies have been consistently engaged with specifically through the different stages of consultation on the GCP, as well as on strategic matters through the Joint Core Strategy (see the JCS Duty to Cooperate Statement at Appendix A).
- 6.3. With regards to the Pre-Submission Regulation 19 consultation, responses were received from the Environment Agency, Historic England, Natural England, Homes England, Gloucestershire NHS Foundation Trust, Gloucestershire Clinical Commissioning Group, the Office of Rail and Road, Highways England, The Marine Management Organisation, and Gloucestershire GFirst Local Enterprise Partnership. A summary of these responses can be found in the Regulation 22 Consultation Statement and the full database of responses.
- 6.4. None of the prescribed bodies raised any objection under the Duty to Cooperate. However, Statements of Common Ground have been prepared to address other matters, which are available to download on the examination website.

7. Duty to Cooperate Matters raised at Pre-Submission (Regulation 19) from non-prescribed parties

- 7.1. Five representors (not prescribed bodies), submitted objections on the basis of the duty to cooperate. These are; CPRE, Newland Homes (Mr T Sheppard), Mr Ian Warren, Redcliffe Homes and Tritax Symmetry. In the case of CPRE and Newland Homes, the objection relates the fact that the authority has an unmet housing need, which should be addressed through cross-boundary working. Mr Ian Warren's objection relates to the suitability of site allocation SA01 'Land at The Wheatridge' for a primary school but does not raise anything of a cross-boundary nature. Redcliffe Homes supports the allocation of SA12 'Land at Rea Lane' and again, doesn't raise any issues of a cross-boundary nature. Tritax Symmetry raise an objection on the basis of employment land, promoting a strategic site located in Stroud District but in close proximity to Gloucester City. A summary of these responses is included in the Regulation 22 Consultation Statement, and full responses are available to download from the examination website.
- 7.2. Issues regarding unmet housing needs and other strategic cross-boundary planning matters are to be addressed through the JCS Review, which has already commenced.

8. Conclusion

- 8.1. The Gloucester, Cheltenham and Tewkesbury JCS addresses the majority of key issues of strategic importance that apply to Gloucester City Council as well as other local authorities and the prescribed bodies. The JCS Inspector found that the JCS had satisfied the Duty to Cooperate. The GCP sits underneath the JCS, taking its strategic direction from this higher-level plan, delivering the JCS locally and addressing specific and detailed issues specific to the City.
- 8.2. The City Plan has been several rounds of public consultation, including the latest Pre-Submission Regulation 19 consultation. During these consultations the prescribed bodies were actively encouraged to submit representations to the plan and the Council has positively and consistently engaged with them to address any issues that have been raised. As a result there are no outstanding duty to cooperate objections from any of the prescribed bodies.
- 8.3. Overall, this statement shows how Gloucester City Council has met the Duty to Co-operate through close working with other authorities and specified bodies (including the prescribed bodies) both through the Joint Core Strategy and at a more localised level in the GCP.

Appendix A: JCS Duty to Cooperate Statement

See separate attachment.

Appendix B: County Planning Officers Group – Meeting notes in relation to Gypsy, Traveller and Travelling Showpeople evidence

See separate attachment.

Joint Core Strategy

Gloucester, Cheltenham and Tewkesbury

Duty to Cooperate Statement

Update June 2015

Changes Sheet

Issue/Update	Change on page/paragraph	Change description
April 2015	1	Date of update
	2	Appendices
	16/8.3	Highways England
	16/8.5	Gloucestershire mou
	21/appendix 3	GCC and transport modelling
	22/appendix 3	LEP
	23/appendix 3	Airport
	23/appendix 3	MoD Ashchurch
	24/appendix 3	English Heritage
	24/25/appendix 3	Sport England
	25/appendix 3	Stagecoach
	43/appendix 6 (note on separate file)	Statements of Cooperation or similar
June 2015	25/appendix 3	Natural England

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- 7 Cooperation with infrastructure providers
- 8 Statements of Co-operation
- 9 Evidence base
- 10 Conclusions

Appendices

- 1 JCS timetable
- 2 Schedule of responses to Pre Submission Plan
- 3 Partnership bodies Pre-submission publication responses
- 4 Stakeholders Pre-submission publication responses
- 5 Gloucestershire Duty to Cooperate schedule
- 6 Statements of Cooperation

1 Introduction

1.1 This statement sets out how the Joint Core Strategy authorities have addressed the legal Duty to Co- operate in the production of the Joint Core Strategy. It details how the Councils have worked collaboratively with other bodies, including neighbouring local authorities and key organisations to address strategic issues and priorities. The statement demonstrates how the duty has been fulfilled by detailing the process of engagement and co-operation, the bodies involved and the outcomes of the process.

Localism Act 2011

1.2 Section 110 of the 2011 Localism Act inserts the Duty to Co-operate as a new Section 33A into the Planning and Compulsory Purchase Act 2004. Section 33A came into effect 15 November 2011. It is not retrospective.

1.3 Section 110 of the Localism Act sets out the new ‘Duty to Co-operate’. The new duty:

- Relates to sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that fall within the remit of a County Council;
- Requires that Councils set out planning policies to address such issues;
- Requires that Councils and public bodies to ‘engage constructively, actively and on an ongoing basis’ to develop strategic policies;
- and Requires Councils to consider joint approaches to plan making.

1.4 It imposes a duty on all planning authorities to work with neighbouring authorities and other prescribed bodies when preparing their development plan documents for ‘strategic matters’. In particular, the duty states that the Duty to Co-operate applies to Local Planning Authorities, County Councils and other prescribed bodies. Those relevant to the JCS Councils are:

- the Environment Agency
- English Heritage
- Natural England
- Civil Aviation Authority
- Homes and Communities Agency
- NHS Primary Care Trust
- Office of the Rail Regulator
- Highways Agency

- Highway Authorities

National Planning Policy Framework

1.5 On the 27th March 2012, the Government issued new national planning guidance for England in the form of the National Planning Policy Framework (NPPF). This reinforces that public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to 'strategic priorities'. Subsequently, local planning authorities are required to work collaboratively with other bodies to ensure that strategic priorities across administrative boundaries are properly co-ordinated and reflected in development plan documents. The NPPF adds that local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross boundary impacts when their Local Plans are submitted for examination.

1.6 A 'Strategic matter' is defined in the Act as: (i) sustainable development or use of land that has or would have a significant impact on at least two local authority areas, including in particular development for or in connection with strategic infrastructure that would have a significant impact on at least two local authority areas; and (ii) sustainable development or use of land in a two-tier area if the development or use is a county matter or would have a significant impact on a county matter.

1.7 Local planning authorities are expected to include reference to activities that fall under the Duty to Co-operate as part of their Annual Monitoring Reports and to prepare a background paper for public examinations to demonstrate they have fully complied with the Duty to Co-operate: this should include full details of the process of engagement and co-operation and the bodies involved, along with the outcome of this process, including any agreements secured or areas of non-agreement. This document summarises the steps taken to date in relation to the Joint Core Strategy.

1.8 Paragraph 156 of the National Planning Policy Framework sets out the strategic issues where co-operation might be appropriate. This encompasses

- the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

1.9 Paragraphs 178-181 give guidance on planning strategically across local authority boundaries, highlighting the importance of joint working to meet development requirements that cannot be wholly met within a single local planning area, through either

joint planning policies or informal strategies such as infrastructure and investment plans.

1.10 Paragraph 179 states

“... joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework. As part of this process, they should consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans.”

1.11 Paragraph 180 states

“...In two tier areas, county and district authorities should co-operate with each other on relevant issues. Local Planning Authorities should work collaboratively on strategic planning priorities to enable delivery of sustainable development in consultation with Local Enterprise Partnerships and Local Nature Partnerships...”

1.12 Paragraph 181 states “Local planning authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy. Co-operation should be a continuous process of engagement from initial thinking through to implementation”

1.13 The NPPF states that ‘Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans’. It also talks of the co-operation between county and district authorities in delivering sustainable development. The mechanisms by which this is achieved should be made clear, and not be a one-off consultation but an on- going, continuous process from planning through to delivery.

1.14 Further guidance on the duty to co-operate is provided in the National Planning Policy Guidance.

2 Cooperation in the preparation of the JCS

2.1 In 2008, Gloucester City and Cheltenham and Tewkesbury Borough Councils agreed to prepare one core strategy covering the entirety of the administrative areas of each of the councils. Many of the characteristics of the area and the issues which it faces, such as flooding, outstanding landscape and the need to plan for sufficient development to provide jobs and housing for future residents are common across the area. There are strong functional, economic, infrastructure, policy and cross-boundary relationships, which mean that working together on a Joint Core Strategy makes good planning sense.

2.2 The Joint Core Strategy is based on collaborative research into the three council areas' characteristics, relationships (with each other and adjoining areas), past trends and future predictions. It makes sense for us to work together on a Joint Core Strategy, primarily because our communities share each other's town centres, leisure facilities and amenities - no matter which local authority area they live in. By working together, we have been able to plan for the JCS area in a consistent way across boundaries.

2.3 In terms of the other Gloucestershire district councils, namely Stroud, Cotswold and Forest of Dean, whilst early discussions included these councils concerning joining, it was subsequently decided that they would 'go alone' and the JCS remain as the three councils.

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

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

2.6 This statement has been prepared to outline the principal activities undertaken by the Joint Core Strategy Councils in the preparation of the Joint Core Strategy. At the point that the duty to co-operate was introduced (November 2011), the JCS had been in the course of preparation for 3 years and the JCS authorities pride themselves on being at the forefront of this requirement.

2.7 This statement identifies activities that have taken place before the duty was introduced and others that are on-going. It should be emphasised strongly from the outset that the JCS Councils' approach is not confined to consultation just to meet the statutory

requirements. Rather, it is one based on building meaningful and productive partnerships at the local level, and ensuring that strategic solutions are reached at the appropriate scale with appropriate parties, wherever these can be of benefit in the delivery of infrastructure and services to the communities. When taken together, these activities help to demonstrate how the duty to co-operate has been fulfilled in preparing the JCS.

2.8 The Duty to Co-operate requires joint working with neighbouring local authorities and other prescribed bodies. It requires Local Planning Authorities to:

- engage constructively, actively and on an ongoing basis with these authorities and bodies to develop strategic policies;
- set out planning policies to address issues which arise from the process of meeting the Duty; and
- consider joint approaches to plan making.

3 Cooperation between the Joint Core Strategy authorities

3.1 A number of spatial options for the distribution of development across the region were considered through the South West Regional Spatial Strategy (RSS) process between 2005 and 2008. The RSS during its development consulted on a range of strategic growth options and set out a sub-regional growth strategy for Gloucester and Cheltenham. A number of detailed studies were also conducted on development needs and the settlement hierarchy.

3.2 Following discussions with the Government Office for the South West (GOSW) and the Regional Development Agency, in March 2008 Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council agreed in principle to work on a joint plan, supported by Gloucestershire County Council.

3.3 In July 2008, the three councils formally agreed to prepare a Joint Core Strategy (JCS), to focus on strategic planning issues and infrastructure planning.

3.4 As one of the earliest steps in the development process of the JCS, the members of the executive groups of Local Strategic Partnerships of the three areas, together with the Gloucestershire Strategic Partnership, were brought together in November 2008 to consider the programme, scope and priorities for the JCS.

3.5 The full JCS timetable is attached in appendix 1.

3.6 The governance of the JCS programme has four key levels:-

- Member Steering Group (political level)
- Cross Boundary Programme Board (Chief Executive level)
- Project Board (Director level)
- Policy Development Group (Planning Policy Managers)

3.7 Member Steering Group (MSG), a cross party steering group, was established to provide political guidance for the whole cross boundary joint working process. Its focus has been on guiding and enabling the programme and ensuring that key officers involved at a strategic and operational delivery level are appraised of any political issues that might affect the programme. At the outset, it was agreed that the activities of the MSG would not replace decision making taking place within each of the individual local authorities but will seek to inform the decision making processes at council level.

3.8 The MSG has an independent chair and involves council members from each of the three district councils together with Gloucestershire County Council.

3.9 The role of Cross Boundary Programme Board (CBPB) has been to take an overarching, strategic overview of the entire joint working programme, including the development of the JCS and related projects focused on the delivery of the JCS. The Board

membership includes the Chief Executives of the three district councils as well as senior managers from the three district councils and the county council, as well as the Chief Executive of the Local Enterprise Partnership (LEP). Other bodies have been involved in these meetings from time to time to discuss specific issues, including cross-boundary issues with neighbouring authorities.

3.10 The diagrams and tables in appendix 2 illustrate the governance arrangements.

3.11 The technical process of gathering evidence, working with stakeholders, organising public consultation and plan making has been managed by the Policy Development Group (PDG). This is made up of the Planning Policy Managers of the three District Councils and the JCS Programme Manager, and meets on a weekly basis.

4 Cooperation with neighbouring and other authorities

4.1 Table 1 below provides a summary of some of the widespread engagement that has taken place to inform and plan for the promotion of cross-boundary relationships. This is in addition to engagement through responses submitted by neighbouring and other interested authorities to the consultations undertaken at the various stages of the emerging JCS.

4.2 As can be seen from Table 1, there has been on-going cross-boundary liaison between authorities for some time in the course of the production of the JCS and equivalent documents in other authority areas.

Table 1: Examples of engagement with neighbouring authorities

Authority(s)	Date	Key points of discussion
Stroud, Cotswold and Forest of Dean District Councils, and Gloucestershire County Council	Monthly meetings of Gloucestershire Planning Officers Group	<ul style="list-style-type: none"> • Identification of strategic issues of shared interest • Facilitation of county-wide joint work at general and specific level (e.g. IDP, OAN, SHMA, GTTSA) • General planning liaison • Opportunities for joint working and training
Wychavon District (South Worcesterhire Local Plan)	On-going since 2009	<ul style="list-style-type: none"> • Cross-boundary issues, with particular referencing to meeting housing needs • General planning liaison • Sharing experiences of joint plan-making

4.3 In respect of co-operation with the other Gloucestershire Districts, this has led to a good understanding of each area's situation and requirements. This has led to close liaison on issues such as strategic infrastructure planning, evaluation of CIL, and a shared approach to the preparation of key evidence (e.g. the Gloucestershire Strategic Housing Market Assessment, establishing objectively assessed need).

4.4 Conversations with non-Gloucestershire neighbours immediately adjacent to the JCS area have not demonstrated an immediate need for land to accommodate unmet housing need from those districts.

5 Cooperation with prescribed bodies

5.1 As described earlier, the prescribed bodies are defined in Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Throughout the Local Plan process there has been liaison and co-operation with the notified statutory bodies with issues being identified through formal liaison and the consultation process.

5.2 Representations have been received from the Environment Agency, the Highways Agency, English Heritage and Natural England at each of the consultation stages of the JCS process. The Council has worked closely with each of them individually throughout the preparation of the JCS to resolve any outstanding issues. The Council will continue to engage with prescribed bodies as it monitors and reviews the Plan implementation.

5.3 Infrastructure is an important and integral element to the future development of the JCS area and there has been co-ordinated engagement this matter with Gloucestershire County Council and other Infrastructure providers, led by the consultants ARUP through the Infrastructure Delivery Plan.

5.4 In addition to the IDP, officers have held discussions with the Highways Agency. The latest version of the IDP is included with the submission documents.

Consultation responses

5.5 Not all prescribed bodies commented at each stage. However, the evidence base documents and consultation material were made available to view and comment on. Appendix 3 provides a schedule of responses detailing the key issues raised by the prescribed bodies in the Pre-Submission JCS publication. It lists the issues and how the JCS authorities have sought to resolve them.

6 Wider partnerships

6.1 Partnership arrangements within Gloucestershire have recently been reviewed and continue to embrace extensive models of partnership working. The wider partnerships that have informed the JCS are described in this section.

6.2 In addition to the specific project work based around the development of the JCS, all of the Gloucestershire authorities are engaged in widespread partnership working over a number of topics and geographical areas, which informs the development of spatial plans.

6.3 A comprehensive schedule of this network of partnership working is set out in appendix 5. This list sets out the theme; issue; local authority and other agencies involved; the actions to date and the outcomes achieved or anticipated. The Schedule has been approved by the County Planning Officers Group (CPOG) and is a resource which will be kept up to date by the represented local authorities.

6.4 A summary of the main partnership bodies is set out below.

Structures	Organisations involved
CSPIG (County Strategic Planning Issues Group)	Cheltenham, Cotswold, Forest of Dean, Gloucester City, Stroud, Tewkesbury, Gloucestershire County Council
CPOG (County Planning Officer Group)	Cheltenham, Cotswold, Forest of Dean, Gloucester City, Stroud, Tewkesbury, Gloucestershire County Council
Local Nature Partnership (replaced the Gloucestershire Biodiversity Action Plan Group)	District Councils (Cheltenham, Cotswold, Forest of Dean, Gloucester City, Stroud, Tewkesbury), Gloucestershire County Council, LEP, Glos Health and Well Being Board, Cotswold Conservation Board, Natural England, National Trust, Forestry Commission, RSPB, National Farmers Union, Environment Agency
Local authority and planning biodiversity group	Cheltenham, Cotswold, Forest of Dean, Gloucester City, Stroud, Tewkesbury, Gloucestershire County Council
Gloucestershire Homes and Communities Group	Cheltenham, Cotswold, Forest of Dean, Gloucester City, Stroud, Tewkesbury, Gloucestershire County Council
Gloucestershire Rural Housing Partnership	District Councils (Cheltenham, Cotswold, Forest of Dean, Gloucester City, Tewkesbury), Registered providers, Gloucestershire Rural Community Council
Cotswolds Tourism	District Councils (Cheltenham, Cotswold, Forest of Dean, Gloucester City, Stroud, Tewkesbury), GFirst, Cotswold AONB
Supporting People Core Strategy Group	District Councils (Cheltenham, Cotswold, Forest of Dean, Gloucester City, Stroud, Tewkesbury), Gloucestershire County
Rural Services Support Group	GRCC, Rural Shops Alliance, Co-operative Futures, Post Office Ltd, Food Standards Board, District Councils (Cheltenham, Cotswold, Forest of Dean, Gloucester City, Stroud, Tewkesbury), GFirst

Working with the Gloucestershire Local Enterprise Partnership (GFirst)

6.5 The JCS Councils and the LEP have had on-going dialogue through the preparation of the JCS and the LEP's Strategic Economic Plan (SEP).

6.6 A statement of cooperation is being discussed with the LEP. It acknowledges the collaboration that the two parties have and the strong links of the two plans.

6.7 The JCS covers the period from 2011 to 2031, and the SEP covers the six year period from 2015 to 2021.

6.8 The JCS and LEP have agreed to use the existing JCS Cross Boundary Programme Board (CBPB) to which the LEP is an attendee, as the coordinating meeting for this cooperation. This board meets on a 6 weekly basis and will oversee the work of the JCS project team.

7. Cooperation with Infrastructure Providers

7.1 Preparation of the JCS IDP by Arup forms part of a joint commission by a partnership of the following councils in Gloucestershire: Cheltenham Borough Council, Cotswold District Council, Gloucester City Council, Forest of Dean District Council, Stroud District Council and Tewkesbury Borough Council. By preparing a series of IDPs for the district councils in Gloucestershire, working closely with the county council, the intention has been to apply a consistent methodology that also provides for the identification of cross-boundary infrastructure issues and solutions.

7.2 Other organisations involved include Network Rail, Highways Agency, British Waterways, National Grid, Wales and West Utilities, Western Power Distribution, Scottish and Southern, BT Openreach, Severn Trent, Thames Water, Environment Agency, Gloucestershire Constabulary, Gloucestershire Fire & Rescue, Southern Western Ambulance Service NHS Foundation Trust, Gloucestershire Clinical Commissioning Group.

8 Statements of co-operation

8.1 Following the Pre-Submission consultation stage, the JCS authorities have continued the ongoing dialogue with those prescribed bodies, which submitted representations suggesting further amendments to the plan that could overcome any remaining concerns.

8.2 As a result a series of meetings have been held leading in some cases to the issues raised being fully resolved and where the issues have not been fully resolved, the intention has been to reach an agreement for ongoing co-operation to ultimately seek resolution.

8.3 To support this, a written or signed agreement for example a 'Statement of Co-operation' (SoC) have been proposed with the following prescribed bodies:-

- Gloucestershire Local Enterprise Partnership (LEP)
- Natural England
- Gloucestershire Airport
- MOD Ashchurch
- Environment Agency
- Sport England
- Stagecoach
- English Heritage

In addition discussions linked to transport modelling are on-going with the Highways Agency and Gloucester County Council in the objective of concurrence on the strategy. Within the appendices are position statements from each.

8.4 Any Statement of Cooperation or similar are listed in the appendices.

8.5 A further memorandum of understanding has been compiled via the County

Planning Officers Group (CPOG) and whilst this was not generated to satisfy a particular submission disagreement is nevertheless included in the appendices.

9 Evidence base

9.1 The JCS authorities have undertaken a large amount of technical work to assist in the identification of the right strategy for the area, to demonstrate delivery and to deal with the issues that are strategic in nature and that span across administrative boundaries. A significant element of establishing the evidence base has been working in conjunction with other local authorities and prescribed bodies.

9.2 The following list highlights a range of evidence that has been undertaken jointly with other authorities and/or prescribed bodies to inform the JCS

- Infrastructure Development Plans (jointly commissioned with Stroud, Cotswold and Forest of Dean District Councils)
- Strategic Housing Market Housing Assessment (jointly commissioned with Stroud, Cotswold and Forest of Dean District Councils)
- Gypsy Travellers and Travelling Showpeople Accommodation Assessment (jointly commissioned with Stroud, Cotswold and Forest of Dean District Councils)
- Objectively Assessed Need (separately commissioned, but with shared methodology with Stroud, Cotswold and Forest of Dean District Councils)
- Strategic Flood Risk Assessments (in consultation/partnership with Environment Agency and Gloucestershire County Council)

10 Conclusions

10.1 The JCS demonstrates the value of joint working in strategic planning across and beyond individual local authority boundaries.

10.2 The three JCS councils saw the value of joint working before the duty to co-operate became a statutory requirement within plan-making.

10.3 There are clear benefits in working jointly where the strategic issues cross boundaries as they so clearly do in this part of Gloucestershire. This is especially true when one or more of the partner authorities cannot meet their future development needs within their own boundaries. A critical benefit of joint working is to enable plans to focus on the most sustainable ways of meeting future needs, and not simply how those needs can be met within an administrative area which may have little relevance to how people and places actually function.

10.4 Joint working also brings many challenges, in terms of governance and decision-making. In the case of the JCS, the three councils clearly recognize the benefits to be gained from joint working, which makes good sense as well as enabling the authorities to satisfy a legal duty.

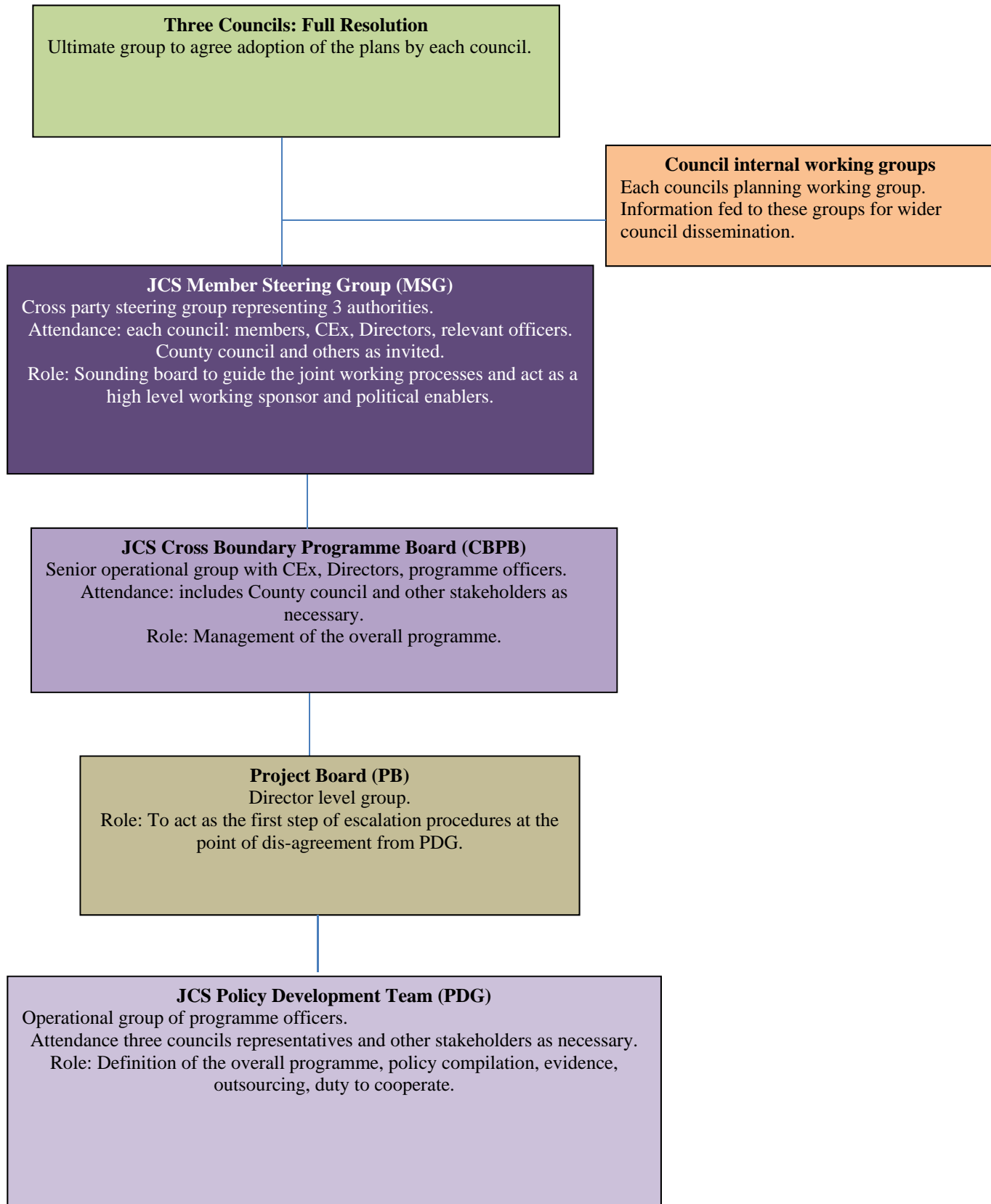
10.5 This topic paper outlines how this has been achieved, by close working between the three councils, with Gloucestershire County Council, with other district councils both within Gloucestershire and neighbouring areas, with the LEP and with a wide range of prescribed and statutory bodies. All of these bodies are partners in the plan's preparation; whilst there remain a number of issues still to be resolved between the JCS councils and partner bodies, of all of these partners have confirmed their satisfaction that the plan has met the duty to co-operate.

Appendix 1 – JCS Timetable

Timescales	Plan Production Process
October 2008	Sustainability Appraisal Scoping Report
Nov 2008 - Nov 2009	Evidence-gathering and preparation of Issues and Key Questions Document
Nov 2009 - Feb 2010	Public consultation on Issues and Key Questions Document
June 2010 - Aug 2010	'Part 1' public consultation
Sept 2010 - Nov 2011	Evidence-gathering and Development of Options
Dec 2011 - Feb 2012	Public consultation on 'Developing the Preferred Option' Document
Feb 2012 – April 2013	Consideration of representations, gathering of new evidence and discussions with key stakeholders
May 2013 - Sept 2013	Developing of Draft JCS Document
Oct 2013 - Dec 2013	Public consultation on Draft Joint Core Strategy
Dec 2013 - March 2014	Consideration of representations and preparation of Pre-Submission Document
June 2014 – August 2014	Formal Publication and Consultation on soundness of Pre-Submission Document
	Consideration of representations and preparation on Submission Document
Winter 2014	Submission to the Secretary of State
Spring 2015	Examination Period
Autumn 2015	Receipt of Inspector's Report
	Adoption of Joint Core Strategy
	Publication of Final Document

Sustainability Appraisal

Appendix 2: JCS Structure



Appendix 3: Local Authority Representations – Summary of Issues Raised

Local Authority 1	Items of Noted on Representation	JCS Actions
Stroud District Council (SDC)	1. Clarification of spatial location of future growth 2. Further support aspirations of the SEP 3. Review timing 4. Process for GB reviews 5. G&T policy 6. Detail on SA policies 7. Clarification of sites to S. Gloucester in SA	1. Noted – no further action 2. See LEP SoC status 3. Agreed timings amended to concur 4. Noted – to be determined by the process 5. Noted - no further action 6. Comment noted no change 7. JCS agrees to explain SA report
SDC Summary	SDC looks forward to working with the JCS (note: memorandum of understanding signed in January 2014 with SDC)	

Local Authority 2	Item of Noted on Representation	JCS Actions
Cotswold District Council (CDC)	Reserved right to make further comment subject to the on-going work on the OAN if necessary.	Agreed – no further action.
CDC Summary	Duty to Cooperate satisfied	

Local Authority 3	Item of Noted on Representation	JCS Actions
Forest of Dean (FoD)	Discussed at council meeting on 31 July 2014 and supported JCS.	No further action.
CDC Summary	Duty to Cooperate satisfied	

Local Authority 4	Item of Noted on Representation	JCS Actions
Gloucestershire County Council (GCC)	1. Broadband 2. Safeguarding waste infrastructure and GB 3. Transport policies	1. JCS noted 2. On-going discussions 3. JCS noted. Also whilst discussion on the transport modelling work is on-going, a position statement has been issued based upon the work to date (see appendices).
GCC Summary	GCC remains keen that further constructive engagement takes place in pursuit of sustainable growth and avoid the risk of potential soundness and deliverability challenges.	

Local Authority 5	Item of Noted on Representation	JCS Actions
South Worcestershire Councils (SWCs)	'It is acknowledged that the partner authorities have engaged constructively at appropriate stages during the preparation of the JCS.'	No further action.
SWCs Summary	Duty to Cooperate satisfied	

Appendix 4: Stakeholder Representations – Summary of Issues Raised

Stakeholder 1	Items of Noted on Representation	JCS Actions
Environmental Agency (EA)	<ol style="list-style-type: none"> 1. Ensuring IDP is updated and that if any water infrastructure related phasing constraints on development are identified ensuring the JCS development is phased appropriately and this is identified in the site allocations policies. 2. The Plan needs to make it clear that the flood risk Sequential Test has been undertaken. 3. Some suggested alterations/additions of wording for some policies and the vision and strategic objectives. 	<ol style="list-style-type: none"> 1. The JCS in principle does not agree with this request. However to further confirm this position; the JCS has been in contact with Severn Trent requesting clarification of their on-going process. Severn Trent responded that they are content with the policies in the Pre-Submission document and confirm that such detail will be reviewed at a later stage of the specific site plan making process. 2. JCS agrees - text amended accordingly. 3. JCS accepts this point however has explained the process used.
EA Summary	<p>The agency feel that the revised text in the submission version meets their concerns in all of the minor wording changes requested and also effectively resolves their query over use of the sequential test. They are happy that we have met the Duty to Co-Operate regarding how are policies are set out in SA1, but do not agree that they are currently sound. They are still seeking the re-introduction of text in the Draft Plan for each strategic site.</p> <p>The Agency are concerned that insufficient information has been supplied from Severn Trent to show that the water management requirements of the sites can be met in full without delays. Severn Trent have said this is the case, but the Environment Agency have issued them with a list of questions they would like to see answered; centring around how much capacity is in the system and when it could come online. They are dissatisfied by, for example the assertion that Hayden can easily increase in capacity if needed. They argue that if this means physical development then as the site is in the greenbelt the grant of permission and the time taken for the works could delay the sites in the Core Strategy.</p> <p>They are happy with the JCS approach to the matters contained in the inspector’s questions on flood risk and water management, excepting the matters described above.</p>	

Stakeholder 2	Items of Noted on Representation	JCS Actions
Local Enterprise Partnership (LEP)	Employment needs and specifically the early release of the safeguarded land at M5 junction 10.	Whilst discussions will continue on this subject matter and specifically junction 10 modifications, a JCS cooperation statement is included in the appendices.
LEP Summary	The LEP supports the plan, Statement of Cooperation discussions and did not raise objections to the duty to cooperate during the Pre-Submission publication - therefore the JCS is of the opinion that the duty to cooperate continues to be met.	

Stakeholder 3	Items of Noted on Representation	JCS Actions
Gloucestershire Clinical Commissioning Group (GCCG)	Gloucestershire CCG noted various comments in their representation, however in principle is supportive of the JCS and the policies within.	No further action.
GCCG Summary	The GCCG supports the plan and therefore the JCS is of the opinion that the duty to cooperate has been met.	

Stakeholder 4	Items of Noted on Representation	JCS Actions
Gloucestershire Airport	<ol style="list-style-type: none"> 1. Further support of the airports economic importance in the JCS area 2. Designation of locations within the airport; 3. Concerns over N Churchdown strategic allocation 	<ol style="list-style-type: none"> 1. Agreed 2. Some areas have been re-designated and SoC defines the agreed process moving forward; 3. See further clarification from the airport in the SoC (see appendices).
Gloucestershire Airport Summary	The concerns raised in the representation are further clarified in the SoC.	

Stakeholder 5	Items of Noted on Representation	JCS Actions
MOD (Ashchurch)	Issues raised in relation to strategic allocation at Ashchurch	Meetings have been held and points have been noted. However the MOD has stated that further discussion would be helpful as soon as a developer is agreed. Attached is a meeting record, please note this has not been formally agreed with the MoD.
MOD Ashchurch	The issues raised are to be further discussed once the developer has been agreed.	

Stakeholder 6	Items of Noted on Representation	JCS Actions
English Heritage (EH)	Concerns over three strategic allocations	JCS has supplied information to support the policies and is continuing to supply further clarification on the last site (NW Cheltenham) to mitigate these concerns.
EH Summary	<p>“development as currently proposed within the setting of the church of St Mary Magdalene (Grade II*) could/would cause considerable harm to its significance. Deferring an impact assessment to a future masterplanning/ planning application stage is not advised as fundamental heritage considerations may affect the principle of development, its form and quantum and as a consequence its deliverability. As such, a Local Plan allocating a strategic site needs to set out clearly the type and amount of development that would be acceptable and provide details on how any affects to heritage assets can be addressed.”</p> <p>English Heritage has asked to meet with the development consortium, but no meeting has yet been arranged.</p>	

Stakeholder 7	Items of Noted on Representation	JCS Actions
Natural England (NE)	Concerns raised with respect to the effects of the JCS on the Cotswold Beechwoods European protected site and policies in relation to Sites of Special Scientific interest (SSSI).	Statement of Common Ground agreed. See appendices.
NE Summary	Both agree that the duty to cooperate has been met.	

Stakeholder 8	Items of Noted on Representation	JCS Actions
Sport England	<ol style="list-style-type: none"> 1. Need for a robust upto date assessment 2. Shurdington playing field – should not be identified for development 3. Proposed amendment to policy 	Draft SoC included in appendices – note tracked changes are not agreed by JCS – ongoing discussions.
Sport England summary	No objection on Duty to Cooperate, but they do disagree on plan soundness in relation to paragraph 73 of NPPF.	

Stakeholder 9	Items of Noted on Representation	JCS Actions
Stagecoach	<ol style="list-style-type: none"> 1. No transport modelling available nor strategic transport assessment. 2. General comments on the strategic objectives. 3. Overriding comment on limited policy support for public transport. 4. Concerns over site A2 N Churchdown and A8 MOD Ashchurch. 	Statement of Common Ground attached in appendices.
Stagecoach Summary	See Statement of Common Ground – of the consideration that JCS has discharged the duty to cooperate.	

Appendix 5: Gloucestershire duty to cooperate schedule

Gloucestershire Duty to Co-operate Schedule

The Localism Act (2011)¹ introduced the 'Duty to Co-operate' and inserted a new section 33A into the Planning and Compulsory Purchase Act to make this a legal duty. The duty requires local authorities, county councils and public bodies to engage constructively, actively and on an ongoing basis relating to the use or development of land or infrastructure which would impact on two or more planning areas.

This schedule covers the six district authorities within Gloucestershire;

- Cheltenham Borough Council (CBC)
- Cotswold District Council (CDC)
- Forest of Dean District Council (FoD)
- Gloucester City Council (GCC)
- Stroud District Council (SDC)
- Tewkesbury Borough Council (TBC)

Gloucestershire County Council (GCC) has statutory plan making responsibilities for minerals, waste and transport planning matters, and is covered by the duty as a County Council in a two tier area.

Local authorities are required to work with neighbouring authorities and other 'prescribed bodies'² in order to maximise the effectiveness of the preparation of their development plan documents and supporting activities insofar as it relates to a strategic matter.

¹ <http://www.legislation.gov.uk/ukpga/2011/20/section/110/enacted>

² <http://www.legislation.gov.uk/uksi/2012/767/regulation/4/made>

The prescribed bodies relevant to Gloucestershire are;

- Environment Agency (EA)
- English Heritage (EH)
- Natural England (NE)
- Civil Aviation Authority (CAA)
- Homes and Communities Agency (HCA)
- Primary Care Trust (PCT)
- Highways Agency (HA)
- Gloucestershire Highway authority (GHA)
- Office of Rail Regulation (ORR)
- Marine Management Organisation (MMO)

The Gloucestershire Local Enterprise Partnership (LEP) and the Gloucestershire Local Nature Partnership are both prescribed bodies covered by a different section of the Act.

Purpose

The purpose of this schedule is:

- to **identify the strategic planning issues** affecting more than one local authority in the Gloucestershire area;
- to **define the processes** for taking these issues forward; and
- to **document outcomes** delivered.

This will provide a framework to ensure effective co-operation throughout the plan-making process.

The schedule will ensure strategic issues are concisely and consistently recorded, regularly monitored and updated and reported through each authority's monitoring reports. The schedule takes stock of work to date and is intended to be a living document recording how the Gloucestershire authorities have achieved compliance with the duty to co-operate as part of fulfilling their strategic planning responsibilities in preparing and keeping under review their local plan delivery programmes. It is intended to

supplement rather than replace, any additional Duty to Co-operate Statements that the district councils may wish to prepare. It is also the case that the Duty to Co-Operate is furthered by informal meetings and communications between parties on a regular basis, not all of which fall within this schedule.

Co-operation with neighbouring authorities

The Gloucestershire authorities work with neighbouring authorities including where appropriate the Welsh Government on a range of cross boundary issues. These issues will also be captured on the schedule.

Local authorities bordering Gloucestershire

- **County councils** Oxfordshire, Warwickshire, Worcestershire
- **Unitary authorities** Herefordshire, Monmouthshire, South Gloucestershire, Swindon, Wiltshire
- **District councils** Malvern Hills, Stratford upon Avon, Vale of White Horse, West Oxfordshire, Wychavon

Policy preparation and implementation

Theme	Issue and outcome/benefit	Local authorities and partners	Actions to date/proposed	Action by which body	Timeframe	Outcome
Co-ordination of strategic plans and infrastructure delivery	Identification of shared priorities, investment opportunities and co-ordination of plan and infrastructure planning and delivery	CSPIG ³ CBC, CDC, FoD, GoCC, GCC, SDC, TBC	1. Consideration of County wide Community Infrastructure Levy 2. To consider the prioritisation of infrastructure investment on a county wide basis	CSPIG CBC, CDC, FoD, GoCC, GCC, SDC, TBC	1. By April 2015 (pending latest consultaion outcomes) 2. Work commencing November 2013	Expected – decision on countywide approach to CIL Agreed prioritisation for strategic infrastructure items for the County
Gloucestersh	Gloucestershire wide	CSPIG	3. Input into Gloucestershire		1. Progress	Expected –

³ County Strategic Planning Issues Group. A group of Chief Executives, senior officers and relevant lead members from each district authority and County Council. The Group is accountable to Leadership Gloucestershire and supported by County Planning Officers Group (CPOG).

ire Growth Plan	strategy for economic growth to secure funding for delivery	CBC, CDC, FoD, GoCC, GCC, SDC, TBC Gloucestershire First HCA LEP	Growth Plan – Strategic Economic Plan (SEP)	CBC, CDC, FoD, GoCC, GCC, SDC, TBC	report Oct 13 2. Draft headlines Dec 2013 3. Final submission March 2014	County wide growth plan supported by all districts to secure domestic & EU funding
Joint Core Strategy	Joint working on a core strategy to consider cross boundary issues	CBC, GCC, TBC GoCC	Preparation of Draft Joint Core Strategy to consider the cross boundary relationships which exist between the three authorities. This work is supported by terms of reference and a defined programme structure, including a Joint Members Steering Group. There is a system of joint officer working overseen by a joint programme manager.	CBC, GCC, TBC	Pre-submission Spring 2014 Submission to SoS August 2014 Expected adoption Dec 2014	Joint Core Strategy and supporting evidence base
Local Transport Plan	1. Implementation of LTP 2. Joint working to identify future priorities for LTP	CBC,CDC, FoD, GoCC, GCC, SDC, TBC LEP,HA, Network Rail, Rail & Bus operators	LTP review to review and revise local policies and revise the LTP delivery plan	GCC	2013/14	Joint delivery of agreed programme of LTP schemes,
Minerals Core Strategy	1. Co-ordinated approach	CBC,CDC, FoD, GoCC, GCC, SDC, TBC	Local planning authorities consulted on core strategy site options document	CBC,CDC, FoD, GoCC, GCC, SDC, TBC	December 2013/January 2014	Expected – adopted County wide Minerals Plan
Waste Core Strategy	Implementation of waste core strategy to ensure sufficient	CBC,CDC, FoD, GoCC, GCC, SDC, TBC	Local plans to reflect waste core strategy and show allocations on proposal maps	CBC,CDC, FoD, GoCC, GCC, SDC,	Ongoing Ongoing	Implementation of adopted Waste Core Strategy

	strategic waste facilities are provided	EA, waste industry	Local planning authorities consulted on planning applications Regular monitoring of the provision of waste facilities through Monitoring Reports	TBC	December annually	
Co-ordination of Local Plans	<ol style="list-style-type: none"> To identify strategic issues for collaboration To identify cross boundary issues for collaboration To ensure consistency 	CPOG (County Planning Officers Group) CBC, CDC, FOD, GoCC, GCC, SDC, TBC	To keep under review	CBC, CDC, FoD, GoCC, GCC, SDC, TBC	Bimonthly meetings	<p>Shared work programmes and outputs eg SHMA.GTSAA and IDP</p> <p>Shared expertise and good practice eg SHLA methodology , neighbourhood planning and file sharing system</p> <p>Developing work on DTC statements and MoU</p>
Natural Environment	<ol style="list-style-type: none"> To ensure that all strategic plans in Gloucestershire contribute to delivering the LNP mission To support and foster inclusive geographic and 	<p>Local Nature Partnership (and district rep on the Board)</p> <p>CBC, CDC, FoD, GoCC, GCC, SDC, TBC</p> <p>LEP, Glos</p>	<ol style="list-style-type: none"> Creation of Local Nature Partnership Development of GLNP Work Plan 2013-14 	<p>CBC, CDC, FoD, GoCC, GCC, SDC, TBC</p> <p>LEP, Glos Health and Well Being Board, Cotswold Conservation</p>	Completed April 2013	Effective co-ordination of policy and management programmes to deliver improvements to Gloucestershire biodiversity

	thematic partnerships	Health and Well Being Board, Cotswold Conservation Board, NE, etc		Board, NE, etc.		
Local Authority And Planning, Biodiversity Group	Role to consider the implications of Local Authority services and functions on biodiversity with a strong focus on planning policy and development control. The group has monitored planning case studies for best (and worse) practice, shared information and facilitated a joined up approach across the County.	Local authority and planning biodiversity group CBC, CDC, FoD, GCC, SDC, TBC	Actively involved in the development and refinement of Gloucestershire Nature Map – which it advocates as a blueprint for a county based ecological network– as well as strategic Green Infrastructure planning. Acts as a sounding board for effective policy drafting and ensuring a consistent policy approach in the County.	CBC,CDC, FoD, GoCC, GCC, SDC, TBC, NE, GWT, GCER	Bimonthly Meetings Ongoing.	Completed review of Nature Map in Feb. 2013 Drafted ecological network and Green Infrastructure in County IDP Stages 1 & 2. Drafting a GI and ecological network strategy for LNP through a sub-group.
The Wildlife Sites Partnership	Established with Defra guidance – to develop an effective system for identifying, designating and offering management advice on wildlife (and geological) sites in the county. It has a fundamental role in identifying the sites which need to be incorporated within the developing	CBC,CDC, FoD, GoCC, GCC, SDC, TBC, NE, GWT, GCER, Glos. County Naturalists Trust. Glos. County Orchard Group	Develop an effective system for identifying, designating and offering management advice on wildlife (and geological) sites in the county. Developing a programme of reviewing existing KWSs and RIGs. It also has a fundamental role in identifying the sites which need to be incorporated within the developing county ecological network and it provides an invaluable resource to delivery partnerships whether national or local.	CBC,CDC, FoD, GoCC, GCC, SDC, TBC, NE, GWT, GCER, Glos. County Naturalists Trust. Glos. County Orchard Group	Quarterly Meetings Ongoing	Compiled annual DEFRA return for County on the local sites indicator. Designated KWS's and commenced programme of review of existing. Obtained insect and bat record data. Sharing

	county ecological network and it provides an invaluable resource to delivery partnerships whether national or local.					information with Gloucestershire Geological Group and Gloucestershire Orchard Group Set up review of GCER SLA.
Cotswold AONB	Co-ordinated response to protect landscape quality	Cotswolds Conservation Board CBC, CDC, GoCC, SDC, TBC NE Oxfordshire, Somerset, Warwickshire and Wiltshire authorities	1. Development of Cotswolds AONB Management Plan 2013-18. 2. Development of complementary policies and interpretation through Local Plans.	Cotswolds Conservation Board CBC, CDC, GoCC, SDC, TBC	Completed Ongoing	Effective co-ordination of policy and management programmes to deliver improvements to AONB
Wye Valley AONB	Co-ordinated response to protect landscape quality	GCC , FoD, Monmouthshire, Herefordshire	1. Development of AONB Management Plan.	AONB management body		Effective co-ordination of policy and management programmes to deliver improvements to AONB
Malvern Hills AONB	Co-ordinated response to protect landscape quality	Malvern Hills DC, FoD, GCC	1. Development of AONB Management Plan.	AONB management body		Effective co-ordination of policy and management programmes to

						deliver improvements to AONB
Affordable housing	Co-ordinated work on affordable housing issues	<p>Gloucestershire Homes and Communities Group</p> <p>CBC, CDC, FoD, GoCC, GCC, SDC, TBC Supporting People Partnership Board. Member and officer reps from all authorities</p>	Joint response to meeting housing needs and homelessness including cross-boundary Housing Market Partnerships, specific task and finish groups around older person's housing, housing for people with specific needs or disabilities, gypsies and travellers.	CBC, CDC, FoD, GoCC, GCC, SDC, TBC	Ongoing	Shared evidence base –SHMA and GTSAA ; provides the basis for consistent statutory planning policies
Rural housing	Co-ordinated delivery of rural housing schemes	<p>Gloucestershire Rural Housing Partnership</p> <p>CDC, FoD, SDC, TBC. Registered providers. Gloucestershire Rural Community Council</p>	<p>Joint funding of Rural Housing Enabler to undertake local needs surveys and bring forward rural affordable housing sites.</p> <p>Additional funding agreed 2013 to facilitate Neighbourhood Plans</p>	CDC, FoD, SDC, TBC. Registered providers. Gloucestershire Rural Community Council	Ongoing	<p>Development of exception schemes</p> <p>Progress with Neighbourhood Plans</p>
Tourism	Joint promotion of Cotswolds as tourism	Cotswolds tourism	Production of annual Visitor Guide and specific thematic promotion initiatives.	CBC, CDC, GoCC, GCC,	Ongoing	Increase in visitor numbers

	destination.	CBC, CDC, GoCC, GCC, SDC, TBC. GFirst Cotswolds AONB	Guidance and support to tourism businesses. Local assessment scheme for accommodation standards.	SDC, TBC. GFirst Cotswolds AONB		
Housing delivery	Joint commissioning of housing related support for vulnerable households	Supporting People Core Strategy Group CBC, CDC, FoD, GoCC, GCC, SDC, TBC	Implementation of Supporting People Strategy. Response to reduced funding by recommissioning services countywide	CBC, CDC, FoD, GoCC, GCC, SDC, TBC	Ongoing	
Rural services	A partnership of public, private, voluntary and community sector organisations aiming to identify and address issues affecting rural services in Gloucestershire	Rural Services Support Group GRCC, Rural Shops Alliance, Co-Operative Futures, Post Office Ltd, FSB GoCC, CDC, TBC, SDC, FoD. GFirst	Information exchange on rural issues, including broadband development, post offices, village shops.	GRCC, Rural Shops Alliance, Co-Operative Futures, Post Office Ltd, FSB GoCC, CDC, TBC, SDC, FoD. GFirst	Ongoing	
Climate Change	A cross sector panel identifying risks and appropriate responses	Climate Change Panel SDC representing District CEOs, GoCC, GWT, Glos First/LEP, Business reps, Glos NHS,	To assess climate change impacts on Gloucestershire and to maintain an overview of adaptation, mitigation and resilience measures			

		Education rep, EA				
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Evidence Base preparation and monitoring

Theme	Issue and outcome/benefit	Local authorities and partners	Actions to date/proposed	Action by which body	Timeframe	Outcome
Sub regional housing requirements	To ensure the evidence base on housing needs across Gloucestershire is consistent, robust and NPPF compliant	CBC, CDC, FoD, GoCC, GCC, SDC, TBC Affordability Model: Heriott Watt University	1. Undertake Gloucestershire wide housing evidence review 2. Production of a county wide affordability model	CBC, CDC, FoD, GoCC, GCC, SDC, TBC Heriott Watt University	Gloucestershire Housing evidence review complete 2011 Gloucestershire Affordability Model complete 2011. Updated October 2013	GCC Report 2010 Housing Trend Analysis and Household and Population Projections Report May 2011 Gloucestershire Affordability Model

Strategic Housing Market Assessment	NPPF compliant Strategic Housing Market Assessment to consider objectively assessed need across housing market area	CBC, CDC, FoD, GoCC, GCC, SDC, TBC HCA, Registered providers, Development Industry, Consultant: SDH	Undertake County wide Strategic Housing Market Assessment Consideration of additional work to supplement and build upon results	CBC, CDC, FoD, GoCC, GCC, SDC, TBC	Final Draft October 2013. Stakeholder consultation Nov 2013 Publication early 2014	Shared SHMA agreed by all 6 authorities
Gypsies, Travellers and Travelling Showpeople	To ensure the evidence base on needs across Gloucestershire is consistent, robust and national policy compliant	CBC, CDC, FoD, GoCC, GCC, SDC, TBC Consultants: Opinion Research Services	<ol style="list-style-type: none"> 1. Undertake Gypsies, Travellers and Travelling Showpeople Accommodation Needs Assessment 2. Carry out Gloucestershire wide Call for Sites and joint assessment of possible sites 	CBC, CDC, FoD, GoCC, GCC, SDC, TBC	<ol style="list-style-type: none"> 1. Complete November 2013 2. Ongoing 	Identification of need across the Gloucestershire area for Gypsies, travellers and travelling showpeople
Environmental resources	GCER is a not-for-profit Local Records Centre which collects, collates, manages and disseminates information of known quality relating to biological & geological sites, wildlife and habitats of Gloucestershire for the public benefit. SDC is a member of the GCER	Gloucestershire Centre for Environmental Records (GCER) CBC, CDC, FoD, GCC, GCC, SDC, TBC, GNT, GWT, NE	<ol style="list-style-type: none"> 1. The Gloucestershire Centre for Environmental Records (GCER) is the Local Record Centre for Gloucestershire; it collates and manages data that informs the evidence base used by LNP partners. 	CBC, CDC, FoD, GCC, GCC, SDC, TBC, GNT, GWT, NE	Quarterly Meetings Ongoing	Renewed a 3 year SLA with GCER. The purpose of GCER is to maintain a record of biodiversity, to educate and inform and to facilitate the conservation of wildlife, habitats and - where data is available- sites of geological significance.

	partnership and a stakeholder that recognises the requirement for continuity of funding to be secured by the partnership.					GCER supplies a free information service to individual members of the public and individual landowners about their own land. GCER provides a vital evidence base for the Local Plan and Development Management decisions.
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Site or scheme specific project

Theme	Issue and outcome/benefit	Local authorities and partners	Actions to date/proposed	Action by which body	Timeframe	Outcome
Nuclear decommissioning (Oldbury,	To ensure proposals take account of local employment and regeneration priorities	SDC, SGDC	Attendance at Magnox/RSRL Competition event		April 2013	Ongoing consultation on proposals to ensure economic benefits are

Berkeley)						realised locally
Cotswolds Water Park	To ensure consistent approach to CWP policies.	CDC, GoCC, Wiltshire, Swindon, West Oxfordshire	Workshop event to look at issues and policy development December 2013.	CDC, Wiltshire	Ongoing	Identify issues and coordinated way forward.
Major transport proposals	Junction 10 all-ways Air balloon roundabout	CBC, CDC, FoD, GCoC, GCC, SDC, TBC LEP HA GHA	Meetings held with HA to discuss the viability of making Junction 10 of the M5 accessible both ways and improvements to air balloon roundabout Transport modelling of JCS proposals	HA, LEP TBC, GCC, CB C and Glos County Council	Ongoing Nov13- March 2014	To improve transport links Comprehensive assessment of transport implications of levels of growth set out in draft JCS
Strategic cycle ways		Sustrans				
Flood mitigation	Strategic Flood Risk Assessment (Levels 1 and 2)	CBC, CDC, FoD, GCC, SDC, TBC GCoC as LLFA EA, Severn IDB, R&CT	Stroud District Council with the other five district's and the County in Gloucestershire have worked together to produce a Level 1 Strategic Flood Risk Assessment (SFRA). The SFRA identifies levels of flood risk from all sources of flooding within the District. A Level 2 SFRA has been carried out in order to provide a detailed assessment of the risk of flooding from non-fluvial sources in areas where new development is proposed. It will also be required where the need to apply the exception test is identified. A level 2 SFRA involves a more detailed review of flood hazard (flood	CBC, CDC, FoD, GCC, SDC, TBC GCoC as LLFA EA, Severn IDB R&CT,	Ongoing Meeting with EA in Jan 2014.	Completed SFRA Level 1 2010. Completed SFRA level 2 2012. Dec. 2013 SDC commissioning Halcrow to undertake a review of all Local Plan allocation sites to ensure compatibility with latest Flood Risk data and modelling.

			probability, flood depth, flood velocity, rate of onset of flooding) taking into account the presence of flood risk management measures such as flood defences. They can also inform the level of detail required for site-specific Flood Risk Assessments (FRA's) by developers.			Sequential testing to be published as part of evidence base.
Coastal management and SECG (Severn Estuary Coastal Group)	The Severn Estuary Coastal Group was formed in 1993 initially to deal with the preparation and completion of the first Shoreline Management Plan for the Estuary area from upstream of Lavernock Point west of Cardiff and Brean Down in Somerset.	All LAs NE, Welsh	The Severn Estuary Coastal Group (SECG) is undertaking a Shoreline Management Plan Review (SMP2) for the Severn Estuary to develop sustainable shoreline management policies for the Estuary.	EA, All LA's, Welsh Environment, IDB's, NE and other coastal groups.	Ongoing Council has engaged with EA Severn Estuary Flood Risk Management Strategy. It has supported the input of Parish Councils and Landowners in the consultation process.	The Severn Estuary Coastal Group (SECG) has been working to develop a Shoreline Management Plan Review (SMP2) for the Severn Estuary to provide policies to manage the shoreline and the risks from erosion and flooding around the Estuary. The Council adopted the document with changes in 2010.
ASERA (Association of Severnside Relevant authorities)	The Association of Severn Estuary Relevant Authorities (ASERA) was formed in recognition of the practical and resourcing difficulties which would be experienced by many	All LAs NE, Welsh	The main requirements for the Severn Estuary EMS are: <ul style="list-style-type: none"> • It should be managed to achieve the 'favourable conservation status' of the habitats and species for which it is designated; • Appropriate steps should be taken to avoid deterioration or 		Ongoing	The Severn Estuary has two European site designations: a Special Protection Area and also a Special Conservation Area. Competent

	organisations if they were to individually attempt to discharge their statutory duties in respect of the nature conservation designations on the Severn Estuary.		<p>significant disturbance of the habitats and species;</p> <ul style="list-style-type: none"> Activities and plans or projects that are likely to have a significant impact on the conservation habitats and species for which the site is designated must be subject to assessment. <p>Joint cover of SAC management- annual meeting</p>			and Relevant authorities have a statutory duty to ensure that they carry out their functions to comply with the Habitats Regulations. The work is referred to in our HRA with particular reference to management of visitor pressure. ASERA are reviewing recreational and visitor impacts.
SEP (Severn estuary partnership)	Co ordination of issues specific to Severn Estuary	All LAs, NE English and Welsh Authorities, EA	<p>The Partnership brings people together to resolve problems and realise opportunities. They currently:</p> <ol style="list-style-type: none"> Facilitate effective communication across and between organisations and individuals Establish and embed a set of 'common principles' for sustainable estuary use via Partners' strategies, policies and action plans Act as a co-ordinating body to assist the effective and efficient delivery of agreed estuary-wide actions Promote and publicise the estuary 		Ongoing and meet at least annually.	Actively supports the Coastal Partnerships Network and helps shape the messages to DEFRA, the MMO and WG. Continued development and annual updating of agreed State of the Severn Estuary Report

			at local, national and international level 5. Add value and fill gaps in effective estuary management, providing extra capacity when required.			
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Infrastructure/Utility providers

Theme	Issue and outcome/benefit	Local authorities and partners	Actions to date/proposed	Action by which body	Timeframe	Outcome
Co-ordination of infrastructure delivery planning	Identification of infrastructure planning and delivery to ensure consistent approach on a county wide basis	CSPIG CBC, CDC, FoD, GoCC, GCC, SDC, TBC Utility & Infrastructure providers	County wide commission of Infrastructure delivery plans to follow same methodology and approach to the infrastructure needs of the districts and JCS authorities. Infrastructure providers have played an active role through their input into the preparation of the individual IDPs. This includes utility providers, HA, GHA, GoCC for education, libraries, blue light services,etc	CBC, CDC, FoD, GoCC, GCC, SDC, TBC	Phased delivery & individual timeframes for the districts	Roll out of District IDPs Stroud: June 2013 JCS: Interim overview and interim main reports Oct 2013

6. Statements of Cooperation

See Appendices

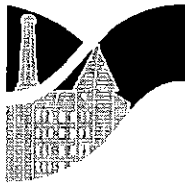
Joint Core Strategy

Gloucester, Cheltenham and Tewkesbury

Duty to Cooperate Statement Appendices
Update June 2015

Statements of Cooperation/Position Statements/Statements of Common Ground/Meeting Notes etc.

- Stroud District Council - SoC
- Gloucestershire - MOU
- Highways England – Position Statement
- Gloucestershire County Council - Transport - Position Statement
- JCS Statement of Duty to Cooperate with LEP (Prepared by JCS Authorities)
- Gloucestershire Airport
- MoD Ashchurch – record of meeting note
- Sport England SoC– draft
- Stagecoach Statement of Common Ground
- Natural England



STROUD DISTRICT COUNCIL

Council Offices Ebley Mill Stroud Gloucestershire GL5 4UB

Telephone 01453 766321

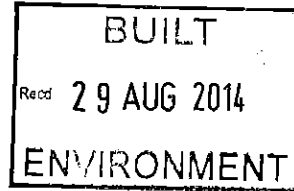
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Tel: 01453 754234

Our Ref: BTW/JAH
Your Ref:

Joint Core Strategy Team
Municipal Offices
Promenade
Cheltenham
Gloucestershire
GL50 9SA



11th August 2014

Dear Jonathan,

I attached the signed copy of the Statement of Cooperation as requested.

I have taken the liberty of adding SDC local plan to the cover sheet to reflect that it is not only a JCS document, especially given that it originated from and was driven by SDC .

While we have noted that there are several variations from the versions that was agreed and that we submitted to our Inspector, the variations and the appendix, do not appear to depart significantly from the previously agreed version.

Yours sincerely

Barry Wyatt
Strategic Head (Development Services)



Statement of Cooperation

Between:

Gloucester City Council, Cheltenham Borough Council, Tewkesbury Borough Council and Stroud District Council

1. Context

The Gloucestershire local planning authorities are working together, within the context of the Duty to Cooperate, to ensure that future Local Plans properly address strategic planning and cross boundary issues. In particular, the Gloucestershire authorities have worked together on an update of the Strategic Housing Market Assessment.

A Memorandum of Understanding covering all of the Gloucestershire authorities within the Strategic Housing Market Area is currently being prepared separately.

This Statement of Cooperation has been prepared as part of the ongoing commitment of the above authorities to work together. The statement has been prepared specifically to address the fact that emerging Local Plans covering these authorities' areas are currently at different stages of preparation. There is therefore a need to co-ordinate and align production of Local Plans to ensure that objectively assessed needs can be accommodated effectively.

The authorities within Gloucestershire may seek to agree other statements of cooperation as and when specific needs arise.

2. Cheltenham, Gloucester and Tewkesbury Joint Core Strategy

The adjoining authorities of Cheltenham Borough Council, Gloucester City Council and Tewkesbury Borough Council are currently producing a Joint Core Strategy (JCS). A draft for consultation was published in October 2013. There is currently a target submission date of August 2014.

The evidence underpinning the draft JCS suggests a possible requirement (derived from the OAN evidence) of between 33,200 and 37,400 new homes and land to support between 21,800 and 28,200 new jobs (2011-2031) to meet objectively assessed needs arising from the three authorities within the JCS area. The range reflects different scenarios regarding the recovery of the economic climate and a return to trend in household formation.

The draft JCS is currently proposing 33,200 new homes and land to support 21,800 jobs. This level of growth is expected to meet the identified needs for the JCS plan period, as envisaged at the current time, although the appropriate level will be monitored and reviewed at regular intervals. The draft JCS currently envisages a review five years following adoption of the JCS and periodically thereafter taking into account the most up to date evidence available at that time (Policy SP1 of draft JCS).



The draft JCS states that if evidence suggests that additional provision of homes or land for employment is required, the review will consider the appropriate response, including the possible need for additional allocations, the early release of safeguarded land, a further green belt review and working with neighbouring authorities under the Duty to Co-operate (Policies SP1 and SP3 of draft JCS).

The Chair of the JCS Programme Board wrote to neighbouring authorities within Gloucestershire on 19 August 2013 to alert authorities to the possibility that the JCS authorities "may need to come to you with a formal request for assistance under the duty to co-operate" in the event that either more than 33,200 homes are needed for the JCS authorities' area to meet a more buoyant economy or the identified sites do not come forward in a timely manner due to the significant infrastructure requirements and long lead in times associated with the large urban extensions.

3. Stroud Submission District Local Plan

Stroud District Council is in the final stages of preparing a Local Plan which was approved for submission in July 2013 and published for pre-submission consultation in September 2013.

The draft Local Plan was submitted for examination in December 2013.

The draft Local Plan includes a commitment for an early review within five years to consider housing proposals designed to meet the clearly identified needs of another planning authority in the housing market area (Policy CP2 of submission Plan).

4. Agreed Statement

A Memorandum of Understanding is being prepared to cover all of the Gloucestershire authorities to ensure constructive, ongoing and active engagement in issues relevant to spatial planning matters.

Within this wider Gloucestershire context, Cheltenham Borough Council, Gloucester City Council, Stroud District Council and Tewkesbury Borough Council agree to the following actions:

- 4.1. The four councils will take a strategic approach in their Local Plans and will seek to develop a strategy which seeks to meet objectively assessed development and infrastructure requirements within the relevant local authority boundaries. Consideration will be given to meeting unmet requirements from another local planning authority in the housing market area where it is reasonable to do so and consistent with achieving sustainable development.

- 4.2. The four councils will work together to agree a site assessment methodology to assess the development potential for housing and employment to meet unmet needs arising from within their areas. The methodology should be based upon the principles of delivering sustainable development, as defined by the NPPF and will include a range of considerations including accessibility to facilities, policy and environmental designations and constraints (e.g. Green Belt, AONB, flooding), deliverability and viability issues. The proposed strategy of the JCS is one of meeting needs where they arise and where this cannot be accommodated, through urban extensions to Cheltenham and Gloucester, in accordance with the agreed JCS strategy. However Stroud may wish to consider alternative locations within their district to help meet unmet needs.
- 4.3. An independent consultant, appointed on behalf of the above authorities, will assess potential and existing urban extensions using the agreed methodology and recommend the most sustainable sites for consideration through future local plans. These recommendations will clearly identify the origin and scale of the objectively assessed needs that each site is intended to meet.
- 4.4. The JCS authorities will seek to adopt the JCS by Spring 2015, put in place district plans to deliver the proposed strategy and will regularly monitor future needs and the delivery of the JCS development strategy. Discussions to address any shortfalls in meeting the OAN as the JCS continues to progress to pre submission and its submission stage, will be arranged as necessary, but at the earliest opportunity to consider options.
- 4.5. The JCS authorities will monitor continuously and will review at regular intervals and no more than five years from adoption, the housing and employment policies contained within the JCS.
- 4.6. Within five years from adoption of the Stroud District Local Plan, or December 2019, whichever is the sooner, Stroud District will review the housing and employment policies contained within the adopted Stroud District Local Plan, to include consideration of any unmet development and infrastructure needs arising from within another authority in the housing market area.
- 4.7. The JCS authorities and Stroud District Council will work together to co-ordinate their Local Plan review processes to ensure that development needs are planned for in a co-ordinated way.
- 4.8. Where a site within Stroud District performs better in sustainability terms than sites located outside Stroud District at meeting the objectively assessed needs arising from another authority in the housing market area, as assessed through an agreed site assessment methodology, Stroud District Council will consider those housing proposals, including through an early review of the Local Plan as per the recommendations proposed to Policy SP2 of the Stroud District Local Plan.

5. Signatures and Date

Signed: MSWATAS Date: 25 June 2014

Gloucester City Council

Signed: [Signature] Date: 27 May 2014

Cheltenham Borough Council

Signed: [Signature] Date: 9 June 2014

Tewkesbury Borough Council

Signed: [Signature] Date: 6th August 2014

Stroud District Council

(These signatures relate to the cooperation that was agreed at the meeting on 31 January 2014 in Gloucester City as whilst the statement was supported in was not signed at the meeting.)

Addendum to Statement of Cooperation between Gloucester City Council, Cheltenham Borough Council, Tewkesbury Borough Council and Stroud District Council.

The Statement of Cooperation as written reflected the Draft JCS (October 2013). Since this time, the Pre Submission version of the JCS (April 2014) has been approved by all three JCS authorities which has been updated from the Draft JCS to reflect revised evidence to support the objectively assessed need. It also updates the way in which the three councils will respond to any need for additional provision of homes or land for employment, which refers to any such review considering the appropriate response including the possible need for additional allocations, the early release of any safeguarded sites and the need for assistance from other neighbouring authorities, as part of the duty to co-operate.

As per the three JCS councils meetings on 7, 8, 9 April 2014 and the approved Presubmission JCS, the evidence underpinning the Pre Submission JCS suggests a requirement (derived from the OAN evidence) of between 30,500 and 38,000 new homes and land to support between 21,000 and 28,000 new jobs (2011-2031), to meet objectively assessed needs arising from the three authorities within the JCS area.

The Pre Submission JCS is currently proposing 31,000 new homes and land to support 28,000 jobs to meet the identified needs for the JCS plan period.

Strategic Planning and Development Issues Memorandum of Understanding for Gloucestershire

1. Introduction

2.

- 1.1 Local planning authorities are required by law, through the Localism Act 2011 to undertake a Duty to Co-operate to 'engage constructively, actively and on an on-going basis' on planning matters that impact on more than one local planning area ('strategic planning matters'). Other public bodies are also subject to the Duty to Co-operate.
- 1.2 The duty is further amplified in the National Planning Policy Framework (NPPF) which sets out the key 'strategic priorities' that should be addressed jointly, with further guidance on interpretation of the Duty set out in the national Planning Practice Guidance (nPPG).
- 1.3 A key output of the Duty to Co-operate is that it should produce effective and deliverable policies on strategic cross boundary matters. The NPPF suggests that a memorandum of understanding could be prepared to demonstrate evidence of local planning authorities having effectively cooperated.

2. Purpose and Objectives

- 2.1 The purpose of this memorandum of understanding is to set out how the signatories will comply with the Duty to Co-operate with respect to strategic planning and development issues within the administrative area of Gloucestershire and relevant adjoining areas.
- 2.2 The memorandum has the following broad objectives:
 - a) To help secure a broad but consistent approach to strategic planning and development issues across Gloucestershire;
 - b) To identify and manage spatial planning issues that impact on more than one local planning area across Gloucestershire;
 - c) To ensure that the local planning and development policies prepared by each local planning authority are, where appropriate, informed by the views of other local planning authorities and public bodies across Gloucestershire;
 - d) To ensure that decisions on major, larger than local planning applications are informed by the views of other local planning authorities and public bodies across Gloucestershire;
 - e) To support better integration and alignment of strategic spatial and investment priorities across Gloucestershire, ensuring that there is a clear and defined route, where necessary, through the statutory local planning process.

3. Scope

- 3.1 Each signatory will engage constructively, actively, expediently, and on an on-going basis in any process which involves the following:
 - a) The preparation of Local Plans;
 - b) The preparation of supplementary planning documents;
 - c) Notification of and consultation on planning applications relating to strategic planning matters;

d) Activities that support any of the above so far as they relate to sustainable development, the use of land for, or in connection with, strategic infrastructure that has or would have a significant impact on at least two planning areas.

3.2 The engagement required of signatories includes, in particular, considering whether to consult on and prepare, and enter into and publish, agreements on joint approaches where there are cross border issues and for local planning authorities considering whether to prepare joint development plan documents.

4. Status

4.1 This memorandum of understanding is an operational document. It is not a formally binding legal agreement.

4.2 The signatories individually and collectively agree to use all reasonable endeavours to comply with the terms and spirit of the memorandum of understanding.

4.3 The signatories recognise that there will not always be full agreement with respect to all of the issues on which they have agreed to co-operate, reflecting that the duty to cooperate is not a duty to agree. But local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters.

4.4 This memorandum does not restrict the discretion of any of the signatories in the consideration of or determination of any planning application, or in the exercise of any of their statutory powers and duties, or in their response to consultations.

4.5 Agreement to or withdrawal from the memorandum of understanding does not remove a local authority's duty to co-operate pursuant to the Act.

5. Parties

5.1 The following local planning authorities have signed this memorandum of understanding:

Cheltenham Borough Council
Cotswold District Council
Forest of Dean District Council
Gloucester City Council
Gloucestershire County Council (also as Highway Authority)
Stroud District Council
Tewkesbury Borough Council

5.2 Other agencies who will be invited to sign include:

Neighbouring planning authorities that share borders with any of the above councils
Environment Agency
English Heritage
Natural England
Civil Aviation Authority
Homes and Communities Agency
National Health Service Commissioning Board / Clinical commissioning groups
Office of the Rail Regulator
Highways Agency
Marine Management Organisation
Gloucestershire Local Enterprise Partnership

6. Strategic Planning

6.1 In line with the NPPF, all signatories want to deliver sustainable development that meets the needs of the present without compromising the ability of future generations to meet their own needs. We want to work together to address strategic and cross-boundary issues. Specifically, relevant signatories will:

- a) Agree those matters which are strategic in nature, based upon an appreciation of the wider demographic, economic, environmental and social context that affects the area, and up-to-date evidence of development needs across the area;
- b) Continue to work together on producing joint evidence where it is the most efficient and effective approach;
- c) Work together to assess the overall quantity, mix and broad distribution of development required within Gloucestershire, including its delivery through necessary strategic infrastructure;
- d) Work together to consider whether, if objectively assessed housing needs arising from one area cannot be met wholly within that area, those unmet housing needs can be met, where it is reasonable to do so, elsewhere in the same Housing Market Area;
- e) Work together to ensure that where strategic or local priorities, including infrastructure, which cross local boundaries within the County or relevant functional geography, signatories work collaboratively together to make sure they are clearly reflected in our individual plans;
- f) Work together to resolve barriers to sustainable development;
- g) Examine options to work together on joint plans where it is the most efficient and effective approach;
- h) Work together to align the production of Local Plans where possible and where not possible in the short term, to agree mechanisms for the review of Local Plans to achieve alignment in the longer term;
- i) Engage constructively, actively and on an ongoing basis to deliver sustainable development; and
- j) Ensure appropriate governance arrangements are in place to take forward the commitments in this memorandum.

7. Strategic Issues and Priorities

7.1 The signatories are currently working together, with other bodies, on the following strategic issues. We agree to continue this partnership working and to extend this where appropriate to other bodies:

- Identifying shared priorities for strategic infrastructure investment and how to co-ordinate the implementation of the Community Infrastructure Levy
- Working with the Local Enterprise Partnership to reflect the Strategic Economic Plan and spatial strategies for growth in local plans and programmes;
- Encourage inward investment and employment opportunities, for example by jointly promoting strategic employment sites;

- Adapting to and mitigating climate change, including through the development of a Gloucestershire energy fund;
- Improving transport links, including the development of major transport schemes, upgrading rail and bus facilities, extending the cycling network;
- Meeting housing needs within the Gloucestershire Strategic Housing Market Area, addressing homelessness and implementing the Supporting People Strategy;
- Co-ordinating the delivery of rural housing schemes;
- Supporting rural communities to prepare plans for their future development;
- Jointly promoting tourism brands within Gloucestershire;
- Supporting and facilitating rural broadband development;
- Developing and implementing a Gloucestershire green infrastructure strategy and ecological network;
- Protecting biodiversity resources including managing recreational pressure from visitors;
- Coordinating policy and management programmes to deliver improvements to the Cotswolds/Wye Valley/Malvern Hills Areas of Outstanding Natural Beauty;
- Managing the Severn Estuary shoreline including addressing the risks from erosion and flooding.

8. Liaison Arrangements

- 8.1 Each local planning authority will be responsible for preparing and adopting their own Local Plan and supplementary planning documents and setting up their own governance arrangements to facilitate this. Where local planning authorities agree to prepare joint plans, joint governance arrangements will be put in place.
- 8.2 The Gloucestershire Economic Growth Joint Committee (GEGJC) consisting of senior officers and councillors from all local planning authorities and other relevant bodies (including any relevant supporting governance structure), meet regularly to discuss strategic and cross-boundary matters across Gloucestershire and will take decisions or make recommendations to decision taking bodies within each local planning authority on how to take forward the commitments within this memorandum.
- 8.3 The County Planning Officers Group (CPOG), consisting of planning officers from all local planning authorities, will meet every two months to provide technical support and advice to GEGJC or related governance structure on strategic and cross-boundary matters. CPOG will monitor the production of Local Plans and supplementary planning documents across Gloucestershire and will examine opportunities for day to day co-operation.
- 8.4 All meetings will be minuted to provide ongoing evidence of co-operation.
- 8.5 All signatories will work together to ensure effective liaison with Gloucestershire Local Enterprise Partnership (GLEP).

9. Consultation Arrangements

9.1 Each local planning authority signatory will:

- a) Notify the signatories in advance of each consultation stage in the preparation of its Local Plan;
- b) Notify the signatories of consultation on any other planning document which, in its view, would have a significant impact on strategic planning or development within the Gloucestershire area;
- c) If requested, meet with and discuss any issues raised by one or more of the other signatories and take into account any views expressed on those issues;
- d) Notify the signatories of any major planning applications, from within its area or on which it is consulted by a local authority from outside its area, which would, in its view, have a significant impact on the strategic planning and development of the Gloucestershire area;
- e) Take into account any views expressed in determining the application.

10. Planning Agreements

10.1 Local planning authority signatories will seek to enter into formal agreement with each other demonstrating their long term commitment to a jointly agreed strategy on cross boundary matters. These agreements will be submitted to Inspectors examining relevant Local Plans.

11. Dispute Resolution

11.1 There may be times when the signatories to this memorandum cannot reach agreement. This may be perfectly acceptable. The duty to cooperate does not mean that all agencies always have to agree. It is important to have mechanisms for dealing with such disputes. If resolution cannot be reached, the matter will be referred to the GEGJC (or relevant governance structure) who will liaise with other appropriate signatories to consider if the issue can be resolved before referral to individual signatory organisations for their own resolution.

12. Timescales and Termination

12.1 This memorandum is intended to run initially for a two year period from January 2015 but will be reviewed in January 2016 to establish how effective it has been.

12.2 This memorandum should be read in conjunction with the Gloucestershire Duty to Co-operate Schedule, which is a live document, updated periodically by the County Planning Officer Group to:

- To identify the strategic planning issues affecting more than one local authority in the Gloucestershire area;
- To define the processes for taking these issues forward; and
- To document outcomes delivered.

12.3 Any of the signatories may withdraw from this memorandum at any time. Any such withdrawal should be notified in writing to the Gloucestershire Economic Growth Joint Committee (GEGJC).

Highways Agency Position Statement in respect of the Transport Evidence for the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy.

The Highways Agency and its advisors have worked extensively with the Joint Core Strategy Team and Gloucester County Council in working towards an acceptable transport evidence base which sets out likely future transport network needs and identifies the measures necessary to satisfy those needs. Set out below is a statement which describes the policy requirements of the Agency in relation to the evidence base together with the progress made to date and the robustness of the emerging evidence base.

The National Planning Policy Framework

The National Planning Policy Framework requires that local planning authorities should work with other authorities and providers during the plan making process to assess the quality and capacity of infrastructure for transport and its ability to meet forecast demands. (para 162).

The aim of this cooperation is to arrive at a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development. (para 181).

Pursuing sustainable development requires careful attention to viability and costs. The sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. (para 173).

To ensure viability, the costs of any requirements likely to be applied to development, such as infrastructure contributions or other requirements should provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable. (para 173)

It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. (para 177).

In terms of identifying the necessity of transport infrastructure, NPPF confirms that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. (para 32).

The Strategic Road Network And The Delivery Of Sustainable Development

The Agency's policy on the delivery of sustainable development is set out in DfT Circular 02/2013. In framing its contribution to the development of Local Plans, the Highways Agency's aim will be to influence the scale and patterns of development so that it is planned in a manner which will not compromise the fulfilment of the primary purpose of the strategic road network. (para 14).

In order to develop a robust transport evidence base, the Agency will work with the local authority to understand the transport implications of development options. This will include assessing the cumulative and individual impacts of the Local Plan proposals upon the ability of the road links and junctions affected to accommodate the forecast traffic flows in terms of capacity and safety. (para 15).

The Agency's protocol document entitled "The Highways Agency and the Local Plan process -

A Protocol for Local Authorities, Developers and the Highways Agency” confirms that the Agency will work with local planning authorities to identify the infrastructure requirements of the overall allocation. Where necessary mitigation measures are unlikely to be feasible or deliverable within the plan period, the Agency will work with the local planning authority to revise the site selection process taking account of such constraints.

Once a list of sites has been selected for which suitable and deliverable mitigation measures have been identified and agreed, we will work with the local planning authority to identify on a site-by-site basis where specific measures or contributions to wider area measures will be required, so that this can form part of the information within the allocation. This will include establishing the appropriate delivery methods and identifying the trigger points at which specific measures are required.

Requirements of the Transport Evidence Base

In order for the transport evidence base to satisfy the requirements of NPPF and Circular 02/2013, it is necessary to establish :-

- The transport impacts of the development allocations.
- The improvements necessary to ensure that the impacts are not severe.
- Any land required for the delivery of the necessary improvements
- The cost of the necessary improvements.
- Any other deliverability constraints.

Progress To Date

Whilst progress has been made on the assessment of the infrastructure needs of the Joint Core Strategy, it is clear to the Agency that there remain a number of outstanding issues and weaknesses in the process undertaken to date. It is however noted that the draft Core Strategy has been submitted to the Inspector and that it has been recognised that further work is necessary, particularly in the identification of the transport evidence base. Set out below are some issues which affect the adequacy of the current transport evidence base in establishing necessary information to ensure the soundness of the Core Strategy.

Age and suitability of the CSV Model.

From early in the process of assessing transport impacts, it has been generally recognised that the 2008 Central Severn Vale (CSV) model, used in the transport strategy development, has a number of weaknesses. The model validation is now more than 8 years old, with some data in the model being 10 years old. This age of data means that the model can no longer be considered to be sufficiently robust to inform traffic assessment work from individual sites such as the strategic allocations but in the absence of anything else, the model is currently the best available. The Agency is supporting the County Council with the development of a new 2014 base year model, which has been informed by new RSI information and will use data sources such as the 2011 census to inform the model development. The new model should be available by the end of the current financial year, but the Agency is aware that the consultancy updating the model has experienced some resource issues and hence there may be a delay. The Agency agree that until such time as the new model is available, the 2008 CSV model is the most appropriate tool for assessing the infrastructure requirements of the Joint Core Strategy although the age and deficiencies of the model will have a bearing on the weight that can be attached to conclusions reached from its use.

Some of the deficiencies of the 2008 model, in terms of its use to inform the Core Strategy, have been noted to the JCS team, and in some locations new data has been collected and attempts made to improve the reliability of the model. Some of these improvements have only been partially effective and the Agency's overall position is that any results from the model should be treated with caution.

Particular areas of concern include the calibration and validation of the model to the south and east of Gloucester (including the A417 Air Balloon and Cowley Roundabout area) and the coarseness of the modelled network to the north of Tewkesbury. The Agency accepts that for the strategic assessment of the development sites identified the model gives a broad indication of likely impact, but the Agency is not able to accept that the model accurately reflects the pattern of traffic movement throughout the modelled area.

The confidence that can be placed in the forecasting of future traffic conditions is entirely dependent on the accuracy of the base year model. While it is accepted that the 2008 CSV model has been subject to a validation process, as is often the case with such models, inaccuracies in the base model become apparent as the forecasting process progresses. Such inaccuracies have been revealed by unexpected network reactions to increases in travel demand and some of these are discussed later in this note. In conclusion however, it is apparent that the 2008 base model, which forms the basis of all forecasting, includes inaccuracies which reduce the confidence that can be placed in the findings of the forecasting exercise. As well as the Air Balloon area discussed above, areas where other inaccuracies exist include the A46(T), M5 J10 and parts of the local road network around Churchdown.

Development of the Transport Strategy

The process of developing the transport strategy commenced with a workshop to discuss potential schemes to mitigate the impacts of development identified in the 2031 Do Minimum model scenario.

The Do minimum scenario (DM2) included all development allocated within the Core Strategy together with background traffic growth to 2030. It should be noted here that a significant part of the residential allocation (30%) is actually committed development with extant planning permission. Of the strategic allocations, planning permission already exists for part and planning applications have been submitted to the LPA for others. This means that the remaining sites, those not yet in the planning system, that will be brought forward after the Local Plan has been confirmed will potentially have to fund wider mitigation measures necessary as a result of the cumulative impact of all sites in the Plan. These issues could decrease the viability of those allocations in the plan that do not have planning permission.

It should also be noted at this point that a future Do Nothing scenario has not been considered. For the identification of the transport impacts of the development allocations, the absence of a Do Nothing scenario is a significant gap in the evidence base. It is acknowledged that a 'no new development' scenario is a theoretical situation, and that there are issues of how traffic growth for sites outside the JCS area should be considered within the methodology but these issues remain for the assessment of with and without development allocations. Without a Do Nothing scenario, it is not possible to determine the transport impacts of the development allocations alone and therefore not possible to determine if the identified schemes in the transport strategy are necessary to ensure that those impacts are not severe. This also means that the identified schemes, which are to be funded by the remaining sites without planning permission, have sought to address not only the

cumulative development impacts of all sites in the Plan but also existing problems and those due to background growth, impacting even further on viability.

In the absence of a Do Nothing scenario, the development of the transport strategy has progressed on the basis of identifying residual network performance issues and considering the means of addressing those issues for further testing on an iterative basis.

Potential schemes for inclusion in the initial transport strategy were identified at a workshop and two Do Something scenarios (DS1 and DS2) were tested to determine transport network performance with each scheme package in place. Scenario DS1 and DS2 were related, with DS1 providing a lower cost transport package and DS2 adding to the schemes in DS1 with some higher cost schemes based on 'realistic and achievable assumptions' (DS3 report pg6).

A third Do Something scenario (DS3) was then developed to address the residual issues identified in DS1 and DS2. All DS scenarios included an 'optimisation' process whereby the network was reviewed and data codings, such as signal timings, were optimised to better reflect the pattern of movement being assigned by that model run. For DS3, as a response to the changes in routes of traffic as a result of the introduction of the two new schemes (new access into A40 from site SA1 and the 'traffic calming'), some more significant schemes were also included in DS3. These included Zoons Court roundabout, C&G roundabout, Estcourt Road/Tewkesbury Rd/ St Oswalds Rd/ Kingsholm Rd roundabout and the A417 off-slips at the A46 junction at Brockworth.

Reports have been produced by the JCS team describing the results of each model scenario, including the 2008 base, Do Minimum and the three "Do Something" scenarios. The DS3 scenario includes aspects of both DS1 and DS2 but does not describe the tested strategy in its entirety.

As previously mentioned, as scenario testing has progressed, further weaknesses in the base model have been identified. The latest DS3 scenario has also attempted to rectify further weaknesses revealed during the development of the scenario. In relation to identifying Core Strategy impacts this in itself presents further difficulties.

However, even taking the DS3 outputs on face value, the Agency consider that the process embarked on by the JCS team is not yet complete. The latest model run (DS3) introduces a new junction on the A40 between Elmbridge roundabout and Longford roundabout and 'traffic calming measures' on rural roads within the JCS area. These two schemes have resulted in a significant increase in the pressure on the strategic road network operated by the Agency. The DS3 report recognises these pressures, but for most links and junctions concludes that the network is operating within its capacity.

DS3 Traffic Model review

It has been previously noted that whilst the Agency has found the traffic modelling undertaken to support the JCS evidence base helpful in identifying the pressures on the network the JCS Allocations cause, it has noted that its approval of the Strategy will be dependent on the final Strategy being tested using the updated 2014 model. Notwithstanding this proviso, the ongoing modelling work has been reviewed on an ongoing basis and feedback provided. The following sections draw together some key issues from recent work that has culminated in the assessment of the DS3 scenario.

Network Optimisation

As noted on page 11 of the JCS Model Output Report DS3 (Rev3.0) report, for DS3 *“some of the junctions were revisited in terms of flares, saturation flows, speed flow curves, lane allocations etc. and minor upgrades were done on top of DS2. These changes were minimal with minor impacts on the assignments”*. Whilst these changes may have enhanced the robustness of the DS3 model run, such changes, some of which are not described in detail in reports, make it even more difficult to differentiate between the changes in assignment due to the Core Strategy allocations, identified schemes, the ‘minimal changes’ made as model corrections, etc. Without a comprehensive review of the models, it is difficult to establish what other “minor” changes have been made and hence what other impacts seen are not due to the identified schemes introduced.

The first DS3 model scenario presented contained an ‘optimisation’ of Longford roundabout which had the effect of increasing the capacity of this junction significantly. Whilst this scenario test did illustrate the benefit of a much larger junction at this location (in terms of the diversion of traffic from central Gloucester), there was no scheme design associated with this improvement and hence it was agreed that scenario DS3 should be re-run without the ‘optimised’ scheme. As noted above, this concern continues.

The final concern with the ‘optimisation’ process is whether this has meant that any junctions/links not subject to any scheme have been optimised in the DS3 data file. If not, then effectively this means that the Base Year network should also be ‘optimised’. This would have the consequence of the Base Year model (and LMVR) together with Do Minimum and Do Something scenarios needing to have to be re-run so that comparison between scenarios can be made on an equal footing. Thus, it would be helpful to confirm that all changes to the network between Base Year and the DS3 scenario are recorded as schemes and the schemes identified.

Additional but unlisted Schemes

In addition to the ‘optimisation’ that has been conducted, it is noted that there are some additional schemes that have been introduced for scenario DS3, as noted in JCS Model Output Report DS3 (Rev3.0) Appendix D ‘Additional Schemes’. It is assumed that the feasibility of implementing and funding these schemes has been considered such that assurance can be given as to the realism of their inclusion in the DS3 scenario. The Agency draw some comfort however in that some of the ‘Additional Schemes’ noted in Appendix D are the signalisation of approach arms at junctions and others involve the resigning of junctions where highway or adjoining land could be available.

However, an exception to this is the Estcourt Road/Tewkesbury Rd/ St Oswalds Rd/ Kingsholm Rd roundabout scheme, where the capacity of the junction as a whole has been increased by, in modelling terms, increasing the ‘saturation flow’ (maximum allowable flow) on the approach links and circulating around the roundabout. Though not on the SRN, its functions (as an alternative route to the Gloucester Northern Bypass), means that the upgrade of this junction is of interest to the Agency. Comparison between the original and new junction coding shows that the increase in capacity has been significant, and hence the Agency would wish to see evidence that a junction to safely accommodate the predicted flows, as assumed in DS3, could be realised ‘on the ground’.

Also, in reviewing the nodes noted as being optimised in Appendix D, it is noted that at Junction 11 both the southbound off-slip and the northbound off-slip have been signalised. Appendix D appears to note that the southbound off-slip has been signalised, but the northbound off-slip is widened and the junction of the off-slip and the circulatory improved. Whilst the Agency is not against the signalisation of off-slips, it does have concerns that schemes included in the modelling may not be

included in the Costed Programme. That is, changes to junction layout and control made in the model coding to achieve a better performing network and/or address congestion issues may not have been reflected in the scheme lists and hence scheme cost tables.

The Agency would welcome sight of an updated Costed Programme and assurance that all schemes assumed in the DS3 and subsequent modelling are either committed or have been included as part of the Costed Programme.

Traffic Calming on Rural Roads

The need for the traffic calming on certain parts of the local road network arose because the DS1 and DS2 scenarios showed very high traffic flows in sensitive residential areas. Whilst, as part of an overall strategy, the importance of safety and quality of life impacts on inappropriate roads is acknowledged, the Agency also has a duty to protect the strategic road network and ensure that it operates in an acceptable manner. The locations where the 'traffic calming' has been introduced is shown on Figure 2-2 in the JCS Model Output Report DS3 (Rev3.0).

Having examined the issues caused on local roads as reported for DS1 and DS2, it is not clear that those routes would actually be capable of accommodating the traffic flows forecast in DS1 and DS2 scenarios. It is likely that the high traffic flows reported are a result of the modelled route capacity being set too high in the base model. While scenario DS3 has sought to address this problem by reducing the modelled traffic speed on these routes, it is clear that the base model should be updated to more accurately reflect local link capacity before considering the need for traffic calming measures.

The table below shows some key sections of routes in the network, and compares the two-way flows shown by the model outputs for the 2008 base year, DM2 model run and DS3.

AM peak hour 2-way PCU (actual flow)			
	2008	DM2	DS3
Innsworth Lane west of B4063 (NW of Churchdown)	523	928	472
Barrow Hill (SE of Churchdown)	1250	1984	800
Stoke Road (west of Bishops Cleeve)	1064	1281	370

The table illustrates that the 'traffic calming' introduced in DS3 has actually reduced the volume of 2031 forecast traffic using some routes to below that shown in the 2008 base year. It would therefore appear that the capacity reduction achieved by the traffic speed change on these routes is too severe.

With such a major change to the network, there has been a significant change in routing patterns over large areas of the model. Hence, whilst the JCS Model Output Report DS3 (Rev3.0) notes that Strategy 3 (DS3) might be called 'Final Strategy', the Agency does not regard DS3 as being tested sufficiently to demonstrate that it is the best strategy.

New A40 Junction for SA1 Access

The new junction on the A40 to serve as a principal access point for site SA1 was also introduced in scenario DS3 at the request of GCC as an additional measure to offset the significant local road impacts reported in DS1 and DS2.

The Agency's policy on the creation of new accesses is set out in paragraph 39 of DfT Circular 02/2013 and states "*Where appropriate, proposals for the creation of new junctions or direct means of access may be identified and developed at the Plan-making stage in circumstances where it can be established that such new infrastructure is essential for the delivery of strategic planned growth*".

The A40 between Elmbridge and Longford Roundabout is to a dual carriageway standard and has a de-restricted speed limit with limited access. The road is not however to Motorway standard.

It would be expected that a new junction in this location, to serve as the primary access for around 1200 houses would impact on the operation of the adjacent junctions, Longford and Elmbridge. The results included in the DS3 report show a significant betterment on the east approach to Longford in the AM peak and a marginal operational detriment in the PM peak, which is contrary to expectations. No information is provided in relation to the effect of the new junction on the performance of the A40 route.

As stated in paragraphs 37 and 38 of Circular 02/2013, the creation of new accesses to the strategic road network can impact on its ability to fulfil the function of facilitating the safe and effective movement of goods and people in support of economic growth by compromising traffic movement and flow. In delivering economic growth at local level, it is essential that the wider economic needs of the country are not compromised. New accesses to busy high speed strategic roads lead to more weaving and turning manoeuvres, which in turn create additional risk to safety and reduce the reliability of journeys, resulting in a negative impact on overall national economic activity and performance.

The document entitled "Strategic highways company - Draft Licence" published by the Secretary of State for confirms that the presumption in favour or against new accesses onto the Strategic Road network should be based on the characteristics of the part of the network concerned. It states :-

- In the case of sections of the network designed for highspeed traffic, with partially or comprehensively limited access, there should be a presumption against connection, except where it can be provided safely and where there is a demonstrable benefit to the economy;
- On all other sections of the network there should be a presumption in favour of connection, except where a clear case can be made to prohibit connection on the basis of safety or economic impacts.

It may be the case that access to SA1 cannot be achieved without a new access onto the A40 in which case the access could result in a benefit to the economy and provided the access could be provided safely, then the DfT's presumption would be in favour of the new access point.

However, the new junction included in scenario DS3 is significant in scale and links to the development site across floodplain. A comparison of the DS2 and DS3 results shows that the new access junction causes significant traffic flow increases at the adjacent junctions (Longford and Elmbridge) and that further capacity improvement would be needed, which will further affect viability. It is not yet clear that site SA1 can be accessed by a new A40 junction in a manner which is

achievable or viable. It may therefore still be necessary to revise the site selection process taking into account the constraints which have been identified through the modelling process.

It should however be noted that pre-application discussion have already started with the land owners appointed transport consultants in relation to this site.

M5 J10

M5 junction 10 includes north facing slips only. The southbound off slip ends at a priority controlled left only junction with the A4019. A right turn manoeuvre is possible from the off-slip and is used by a number of motorists but requires vehicles to weave to the off side lane over a short distance and perform a U-turn at the Withybridge Lane turn. Queues from the A4019 give way line often extend back towards the M5 mainline.

The model does not show the formation of any queuing on the off slip in the base, DM or DS scenarios. This is despite the significant development at site SA5 and the other development to the north which will increase demand for trips into Cheltenham particularly in the AM peak. This is an area of the base model which does not appear to replicate current network performance.

Scenario DS3 includes the signalisation of the southbound off-slip but the report recommends that that scheme is not included in the transport strategy. Further work is required to consider to gain a more accurate replication of current junction operation and then to determine the effects of the Core Strategy allocations before this recommendation can be supported.

A46 between M5 J9 and Teddington Hands Roundabout.

During the review of the outputs of DS1 and DS2 scenario reports, it became apparent that the A46 between M5 J9 and Teddington Hands Roundabout was modelled in 2008 base, DM and DS1 models as a significantly higher standard of route than currently exists. This means that there is no evidence to suggest that the A46 would perform satisfactorily without the improvements already assumed in the modelling and that these improvements should be considered as schemes to be included in the list of necessary highway improvements. By comparing the 2008 base, DM and DS1 models to the existing road geometry, a number of "schemes" were identified including the widening of the A46 across the Bristol to Birmingham railway line. These schemes are not however listed in any of the reports provided to date.

In the main, the performance of the A46 in scenario DS1 was satisfactory suggesting that the "schemes" included within it are satisfactory. The one exception to this was the section between M5 J9 and Alexander Way. This was improved to a dual 2 lane carriageway in scenario DS2 although the westbound approach to Junction 9 remained over capacity. Scenario DS3 included a free flow left turn slip from the A46 westbound to M5 southbound to resolve the remaining capacity issue. It should be noted however, that this scheme would require third party land and this needs to be taken into account when considering deliverability. This is particularly pertinent as the strategic allocation site (SA8) site which includes the land required for the DS3 improvement scheme is currently going through the planning system and is due to be determined soon.

These unlisted differences between the DS3 (and other scenarios) and the existing network geometry only became apparent when investigating unexpected reactions to traffic flow increase. It would be helpful if it could be confirmed that there are no other unlisted differences or if there are, what they are.

Other Residual Capacity Concerns

Pages 35 and 36 of the JCS Model Output Report DS3 (Rev3.0) notes areas which remain under pressure in the DS3 scenario. A number of these (e.g. Over roundabout, Longford roundabout, M5 J10, M5 J9, Aston Cross and Air Balloon roundabout) are of interest to the Agency. The pressures on the A40 junctions are also shown on Table 3-8, with Over roundabout and Longford roundabout reflecting the more limited nature of scheme proposals (within the JCS scheme lists of existing committed schemes) for these junctions in comparison to Elmbridge and C&G roundabouts to the east. Accordingly, further reassurance on the ability of the network plus new schemes to accommodate the predicted increase in traffic as a result of new development in the JCS area is required. The JCS Model Output Report DS3 (Rev3.0) pg 64 notes recommendations for further refinement of DS3 Strategy with a list of junctions “that may benefit from further improvement”. Clarification on whether this recommendation will be acted upon by the JCS team would be helpful.

In relation to the Air Balloon roundabout, the DS3 report identifies that the junction remains under stress in the DS3 scenario but states that *“it is hardly impacted by the delivery of JCS development because not much development flows use this junction”*. This conclusion cannot be reached from the information presented in the reports as it would require a comparison of traffic flows in the DS3 scenario to a Do Nothing scenario which has not been undertaken. It is however possible to undertake “select link” analysis to determine the origins and destinations of the traffic flows through the junction. This exercise has been replicated by the Agency but identifies a further potential weakness in the modelling undertaken. The reason that Air Balloon is not affected by the JCS allocations is because the associated new traffic movements are primarily between housing and employment on the allocations and are not to or from existing development within the JCS area or areas outside the JCS area. It is therefore likely that longer distance traffic movements, such as those between the new residents of the JCS area and the employment opportunities in Swindon for example have been underestimated. This issue was raised by the Agency at the time of the discussion on the appropriate use of local plan data as opposed to Tempro. The Agency acknowledge the decision taken only to assume adopted Local Plans as a update to Tempro, but the emerging Local Plans suggest that the number of employment opportunities in Swindon, and Bristol, will be greater.

It is also noted, in relation to the statement regarding Air Balloon roundabout, that model performance in the vicinity of the Air Balloon junction and more minor roads to the south still causes concern to the Agency. The Agency acknowledge that attempts have been made to improve the validation of the model in this area, but the 2031 volumes of traffic in the vicinity of (for example) Birdlip, Brimpsfield and Cranham and the ability of the network on the ground to accommodate these volumes remain a concern.

Given these two issues concerning the Air Balloon junction, it is suggested that any comment on the relationship between the JCS allocations and the Air Balloon junctions await results from the 2014 update model.

Recommendations for Further Network Improvements

As previously mentioned, the development of the transport strategy has progressed on the basis of identifying residual network performance issues and considering the means of addressing those issues for further testing on an iterative basis. Scenario DS3 also includes residual network performance issues and recommendations are made within the report for further network improvements to resolve them. The testing of these additional measures would need to be a future

iteration of the process. However, from the report, the basis on which these recommendations are made is not clear.

For example, the Westbound approach to Over roundabout on the A40 is recommended for further improvement. The junction is however not highlighted as a problem in Fig 3-14, 3-15 or 3-17 of the DS3 report. Fig 3-16 identifies the junction has having an RFC of 85% to 95% but this is further clarified in Table 3-8 which shows the junction as having an RFC of 87% in the AM peak. The same table shows delays of 36 seconds in the AM peak and 26 seconds in the PM peak. Average queues are 6 pcu's in the AM peak and 7 pcu's in the PM peak.

It must be remembered that, according to NPPF, further network improvement could only be justified where they are necessary to ensure that development impacts are not severe. It would be difficult to support a case for additional network improvement based on the reported performance parameters.

While further network performance would be welcomed in terms of ensuring that Over roundabout, and anywhere else for that matter, operated without congestion on 2031, such improvements could not be deemed to be necessary through the planning process on the basis of the current evidence base.

The report also recommends further improvement to Aston Cross on the A46. Again, the basis of the recommendation is not clear. In this case, parts of the junction are shown to operate in excess of 100% RFC and in such circumstances it is likely that significant queues will arise. As previously noted however, Aston Cross and the majority of the A46 between M5 J9 and Teddington Hands roundabout operated satisfactorily in scenario DS2, albeit with improvements already assumed. The need for the additional improvements appears to have arisen as a result of the introduction of traffic calming on the local roads causing changes in traffic movement over the wider network. Given the existing constraints on land availability at this junction it is unlikely that further improvement could be achieved. The need for the traffic calming should be further investigated before making the Core Strategy dependant on further network improvements that may not be achievable.

Summary

The Highways Agency and its advisors have worked extensively with the Joint Core Strategy Team and Gloucester County Council in working towards an acceptable transport evidence base which sets out likely future transport network needs and identifies the measures necessary to satisfy those needs.

In order for the transport evidence base to satisfy the requirements of NPPF and Circular 02/2013, it is necessary to establish :-

- The transport impacts of the development allocations.
- The improvements necessary to ensure that the impacts are not severe.

In developing the transport evidence base, use has been made of the 2008 Central Severn Vale (CSV) model. It has been generally recognised from the start of the process that the 2008 Central Severn Vale (CSV) model, has a number of weaknesses. The CSV model validation is now more than 8 years old, with some data in the model being 10 years old. This age of data means that the model can no longer be considered to be sufficiently robust to inform traffic assessment work from individual sites such as the strategic allocations. However, the Agency agree that until such time as the updated

2014 model is available, the 2008 CSV model is the most appropriate tool for assessing the infrastructure requirements of the Joint Core Strategy.

While the 2008 base model includes a number of deficiencies and inaccuracies, attempts have been during the transport strategy development to resolve some of these deficiencies. It must be recognised however that the relevant model improvements have only been partially effective and the Agency's overall position is that any results from the model should be treated with caution.

The methodology undertaken excludes the use of a Do Nothing scenario which would have established a benchmark against which the effects of the development allocations could be measured. It is not therefore possible to isolate the transport effects of the development allocations from the effects of background growth and existing issues. In the absence of a Do Nothing scenario, the development of the transport strategy has progressed on the basis of identifying residual network performance issues and considering the means of addressing those issues for further testing on an iterative basis.

Nevertheless, the process embarked on by the JCS team has concluded with scenario DS3 which constitutes a very significant package of transport improvements and includes a number of potentially high cost items. The network improvement schemes deemed to be included in strategy are inclusive of the following four broad categories :-

- those which are explicitly identified and listed in the various reports (DS1, DS2 and DS3).
- those which are recommended in DS3 but are as yet untested.
- those which have been introduced as "optimisations" of the modelled network listed in Appendix D of the DS3 report.
- other differences between the DS3 modelled network and the existing highway network which are not explicitly identified or listed as schemes or optimisations in the various reports – eg the A46 "schemes".

In terms of the SRN, all junctions, with the exception of M5 junction 12, have been identified for improvement and on that basis the Agency can agree that the model gives a broad indication of likely development impact. The Agency is not able to accept however that the model accurately reflects the pattern of traffic movement throughout the modelled area and therefore the scale of improvement at each location cannot be established to a satisfactory degree. Having said that, it is likely, because the schemes identified also set out to resolve existing issues and issues due to background growth, that the totality of the package of transport improvements is sufficient, if not in excess of that required, for the purpose of ensuring that the impact of the Core Strategy allocations is not severe. This also means however, that it cannot be confirmed that all schemes are necessary for the purpose of ensuring that the impact of the Core Strategy allocations is not severe.

The Agency is hopeful that the new 2014 traffic model will be available before the JCS Local Plan Inquiry. It is assumed that the JCS allocations, with final mitigation strategy, will be tested using the updated model and the result presented for review.

It was agreed by the JCS team on 5th February 2015 that further refinement of the transport strategy will be undertaken in advance of the new model being available in order to determine the deliverability of the identified schemes and to better reflect the effectiveness of others, particularly the traffic calming schemes. An updated position statement will be provided when further evidence is made available.

Gloucestershire County Council

Cheltenham, Gloucester and Tewkesbury Joint Core Strategy (JCS)

Position Statement in respect of the Transport Evidence for the JCS

Summary

Gloucestershire County Council (GCC) has actively engaged and cooperated with the JCS process to establish a robust transport strategy that is realistic in terms of delivery and affordability.

Two rounds of technical traffic modelling assessments of different transport mitigation scenarios have been undertaken during 2013/14 and 2014/15. This technical process is still ongoing and the preferred package of mitigation measures required to enable the delivery of the JCS is still not fully understood.

As a result the transport infrastructure requirements identified in the JCS Infrastructure Delivery Plan (IDP) are primarily informed by the Central Severn Vale Transport Study (2010) which was developed using a historic, now out of date, set of growth assumptions.

Gloucestershire County Council remains committed to co-operate in the process of supporting the JCS authorities to identify a deliverable and affordable Transport Strategy.

1. Introduction

Gloucestershire County Council has actively engaged and cooperated with the Gloucester-Cheltenham-Tewkesbury JCS process.

GCC's prime focus for *transport* is the creation of a safe and sustainable transport network across the county. In partnership with the Highways England (HE) (previously the Highways Agency) and the JCS authorities, GCC has assisted the JCS Team in establishing a robust transport evidence base.

The aim of the evidence base is to set out the likely future impacts of the strategic development allocations identified in the JCS on the transport network. This is in terms of network capacity and the identification of a realistic and affordable set of mitigation measures to reduce those impacts where appropriate in line with national and local policy guidance.

Once completed, outputs from this assessment would inform a JCS Transport Strategy and be used to update the Infrastructure Delivery Plan (IDP).

The transport infrastructure requirements identified in the IDP are based on a number of sources including the Central Severn Vale Transport Study (2010); Local Transport Plan 3 (2011); and Strategic Economic Plan (2014). The key to this is the Central Severn Vale Transport Study (2010) which itself was produced to inform the LTP3 and the JCS IDP. However the assumptions for growth within this study were based on those outlined in the now redundant South West Regional Spatial Strategy and not the levels of growth outlined in the JCS.

At the time of writing this statement the updated transport evidence process has not been completed. This statement therefore outlines GCC's role in supporting the emerging the JCS Transport Evidence Base.

2. Central Severn Vale SATURN model

GCC and the HE jointly own the 2008 Central Severn Vale (CSV) SATURN highways peak hour models. The models were built on behalf of GCC and HE by ATKINS Highways and Transport based on an earlier 2003 CSV SATURN model.

The 2008 models are fully validated and supported by a Local Model Validation Report. The 2008 CSV Model includes detailed highway network coding (known as the 'simulation' network) for the Cheltenham and Gloucester urban environs, but with a less refined 'buffer' network for the Tewkesbury and Ashchurch areas.

To ensure that traffic models remain fit for purpose and accurate, they are required to be updated on a five yearly (six at most) cycle. The existing CSV Model has a 2008 base year, and GCC and the HE are currently in the process of developing an updated 2013 model. This process began in 2012/13 with the updated 2013 CSV Model not expected for completion until June 2015.

Despite the age of the 2008 CSV models, the potential weakness for the modelling assessment around the Tewkesbury and Ashchurch and in the absence of any alternatives (the availability of using the 2013 CSV Model update did not fit within the originally planned JCS submission date of November 2014), the 2008 CSV Models were considered by GCC, the HE and the JCS Team as the most appropriate tool to inform the JCS Transport Evidence Base.

As the Transport Evidence process progressed the HE's consultants identified a number of coding issues within the model which questioned the robustness of the model outputs in certain sections of the model. These issues were not known by GCC at the outset of the process and we were grateful to the HE for highlighting these issues. The role of transport modelling had been outsourced and was managed on behalf of the authority by ATKINS Highways and Transport until April 2014. Where these issues could be addressed they have been within the 2008 model as part of the JCS Transport Evidence process. Where this was not possible the issues were forwarded to GCC's new modelling consultants who are building the 2013 CSV model to improve the accuracy and robustness of the updated model. The new 2013 CSV model is expected to be ready for use from mid June 2015.

3. Developing the Preferred Option Consultation (December 2011 - February 2012)

During 2011/12 GCC through its dialogue with the JCS authorities stressed the importance for further assessment and analysis of the emerging growth proposals to inform the Developing the Preferred Option stage of the JCS. At the time of this the Transport Evidence base consisted of the Central Severn Vale Transport Study (2010) which was heavily dependent on the now defunct emerging South West-Regional Spatial Strategy.

To support the JCS process GCC officers provided a high level assessment of potential infrastructure issues and concerns that would require further investigation should particular sites be taken forward to the next stage of the JCS.

This assessment was based on a significant number of assumptions. This included assumptions on the size, scale and nature of development. At the time it was assumed that the scale of development would be sufficient for it to be sustainable and financially viable to provide the necessary level of infrastructure and services identified.

A commitment to undertake a comprehensive technical exercise using the 2008 CSV SATURN highways model was made between GCC and the JCS authorities. However the project had to be suspended due to too much uncertainty over the proposed development quantum, its spatial distribution and anticipated delivery timescales/build out rates.

In the absence of this information GCC could not continue with this work until there was a greater level of certainty regarding the proposed sites. As this was not available it was agreed with the JCS team that no further transport evidence would be produced at this stage of the plan process.

4. Draft for Consultation JCS (October 2013) Highways Modelling (Autumn 2013 to Spring 2014)

During 2013/14 and at the request of the JCS authorities GCC commissioned and project managed ATKINS Highways and Transport on behalf of the JCS authorities to assess the cumulative impacts of the land use development proposals outlined in the Draft for Consultation JCS (October 2013). The assessment process used the 2008 CSV SATURN highways models, developed for an agreed 2031 forecast year.

The assessment comprised of two stages. Initially the land use proposals identified in the 'Draft for Consultation JCS' were assessed to understand the cumulative traffic impact on the highway network without mitigation measures. A second stage included the testing of two mitigation scenarios. Initially it was planned for the Stage 1 assessment to inform the identification of the Stage 2 assessment the outputs from which would be used to inform a 'preferred scenario'.

However, due to a limited time table of JCS the identification of the Stage 2 mitigation measures were required in advance of the Stage 1 outputs becoming available. The identification of the measures at this stage of the process was not evidence led, but based on Officers' professional judgement.

This modelling commission was completed by March 2014. It provided a sound understanding of the likely impacts of the proposed level of development on the highways network. The report concluded that the highway infrastructure focused scenario did have a significant impact in reducing vehicle delay on the network, but in the absence of further scenario testing the process failed to quantify what the impact would be if certain schemes were to be removed from the scenario. In terms of viability greater refinement of the transport schemes identified within the highway infrastructure focussed scenario would be required before a preferred transport package could be identified and supported by GCC.

5. Pre-Submission Joint Core Strategy (April 2014) Highways Modelling [Summer 2014 to Spring 2015)

During 2014/15 additional modelling was required to test the latest changes in land-use allocations identified in the Pre-Submission version of the GCT-JCS and identify a preferred transport package. The scale of proposed developed was reduced from the Draft for Consultation stage and the transport scenario needed to reflect this.

GCC and the HE helped scope and agree a project brief for this round of modelling. The process was managed by the GCT-JCS Team with GCC officers and the HE attending and actively participating in project meetings.

To address the known 'buffer network' issues within the Tewkesbury / Ashchurch area of the 2008 CSV Model, GCC agreed to finance a 'local area' upgrade of the model to extend the 'simulation network' area and improve the quality of model outputs within this corridor. A commitment of £42k was made by GCC to fund this improvement and the associated local area Model Validation Report outlining the update/improvement process.

To inform the identification of potential mitigation measures GCC officers managed two workshops with local stakeholders to identify issues and possible mitigation schemes. The output from these sessions was the identification of a 'long list' of schemes. GCC then worked with ATKINS Highways and Transport to reduce the 'long-list' of schemes to a 'short-list' reflecting more 'realistic and potentially deliverable' schemes, taking viability into account as best as possible.

At subsequent project meetings, this 'short-list' of schemes was then used to initially inform two mitigation scenarios, for model testing and reporting. A third scenario was identified having reviewed the outputs from the first two scenarios.

Throughout this round of modelling ATKINS Highways and Transport have provided a series of Technical Notes (TNs) outlining the assumptions and their approach to the different stages of the modelling process. These were informed by discussions with GCC officers, HE's officers and their Consultants. In each case, once the TNs were circulated to GCC and the HE, a timeframe was agreed for feedback to be received.

Despite regular feedback being provided on the TNs and modelling reports it has not always been understood if the feedback has been acted upon by the ATKINS Highways and Transport modellers as the final version of the TNs have not always been issued to GCC for review.

On the 5th February 2015 the HE provided a presentation to GCC and the JCS Team in which they outlined a number of concerns they had regarding the coding of junctions and links within the 2008 CSV model. The HE also through their presentation raised concerns about how some of the mitigation measures identified in the third scenario had been modelled. In response the JCS Team commissioned a revised 3a Scenario which addressed the coding issues identified.

Outputs from the revised 3a Scenario were received on the 15th April 2015. The revised 3a Scenario reduces some of the impacts of the traffic generated by the Pre-Submission JCS, but there continues to be a number of junctions that are in close proximity of the strategic allocations which report Link Volume to capacity more than 90% during either one or both periods of peak travel. Mitigation measures must be identified for these junctions before any transport strategy can be agreed. These junctions include:

- Junction of Cheltenham Road East and Pirton lane, near Strategic Allocation Site A2 and A3;
- A40 Longford Roundabout;
- A46 Shurdington;
- M5 Junction10 Southbound Off-slip;
- A46 Aston Cross Junction, Tewkesbury;

As a result the Evidence Base remains incomplete with a need for ongoing assessment to work towards an agreed transport 'preferred strategy'.

Based on the original project brief scoped by GCC and the HA, the three transport scenarios would have been tested with the outputs from these scenarios then analysed to inform a 'preferred strategy'. This 'preferred strategy' may have been as a result of taking the most appropriate measure from each of the scenarios tested at each network pinch points i.e. a blending of the three transport scenarios tested. This agreed approach has not been adhered to and instead the assumption has been taken to keep adding new measures from one scenario to the other. This approach moves away from the purpose of the original brief to identify a realistic and affordable package of mitigation measures.

6. Conclusion

The JCS was submitted on 20th November 2014 before the latest round of JCS Transport modelling had been completed. The evidence base provided to date identifies the likely future impacts on the transport network in terms of network capacity of the -JCS Strategic Allocations. The scheme identification and appraisal process has also identified a list of mitigation measures. However, understanding which package of these mitigation measures is required to enable the delivery of the JCS, while not impacting the viability of the plan, is still not fully understood.

**Statement for the JCS Examination
Prepared by the JCS Authorities**

Joint Cooperation in the Preparation of the JCS – Local Authorities and GFirst LEP

This statement sets out the extent and detail of the cooperation that has occurred between Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council (the JCS councils) and the Gloucestershire First Local Enterprise Partnership (GFirst LEP) in the preparation of the Joint Core Strategy (JCS). The statement also demonstrates that JCS councils, through their development of the JCS and other associated actions are supporting the aims of the GFirst LEP for the delivery of economic growth in the area. The overall intention of this statement therefore is to give a short factual explanation setting out how the JCS councils have discharged the duty to cooperate placed upon them by the Localism Act 2011 in respect of the GFirstLEP.

The three JCS councils and GFirst LEP share common aims to promote and support the economic success of Gloucestershire as a whole, but in particular the area covered by the JCS. The three councils have worked closely with GFirst LEP since its creation in 2011 to achieve this shared aim. The JCS councils have consistently and actively supported the development and the delivery of the Gloucestershire Strategic Economic Plan (SEP) and the associated Local Growth Deal project programme approved by Government in 2014. The SEP includes aims and objectives which are supported by the JCS councils and fully consistent with the JCS.

In addition to the important economic development work they each undertake in their own areas, the JCS councils support the delivery of the aims of the SEP and the Local Growth Deal programme through their membership of the Gloucestershire Economic Growth Joint Committee. This formally constituted joint committee is a key part of the Local Growth Deal partnership structure agreed with Government in 2014 and is crucial to the delivery of the programme.

An example of the very practical work being undertaken by the JCS councils to deliver the joint economic growth aims of the SEP and the JCS is the successful application for HCA capacity funding to the value of £1.36m to bring forward the strategic allocations at Ashchurch and North West Cheltenham. A further example is the work to establish a multi-agency development partnership, approved and supported by the GEGJC and the GFirst LEP to coordinate the delivery of growth in the Ashchurch area of Tewkesbury Borough

The cooperation and engagement between the GFirst LEP and the JCS councils in the development of the JCS has continued since GFirst LEP's creation in 2011. GFirst LEP are represented at Chief Executive/Senior Officer level on the JCS Cross Boundary Programme Board, the senior programme management body of the JCS governance structure and have contributed to the JCS at all stages during its development. This partnership has been particularly helpful and continues currently.

The JCS will deliver 30,500 new homes, land for 28,000 new jobs including 64ha of new employment land to an economically important area of Gloucestershire during the life of the plan and will support the economic development of Gloucestershire as a whole.

GFirstLEP and the JCS councils all agree that to drive economic growth there is a pressing need for the current 2-way restricted junction at the M5 junction 10 to be upgraded to 4-way and have been working in partnership for some time to achieve this aim. The upgrade of this junction is a key aim of the SEP and this is fully supported by the JCS councils. The SEP also includes an aim to deliver additional high quality employment and mixed use land at junction 10 linked to the upgrade of the junction. As stated in the SEP, the justification for a junction upgrade to 4-way rests on the potential to unlock this further strategic employment and mixed use site at the JCS safeguarded land close to the junction. This is recognised by the JCS councils and therefore discussions between them and GFirstLEP will continue in order to consider how best the support for the case to upgrade the current restricted junction at can be implemented.

GFirst LEP have not raised any objections to the plan on the basis of the Duty to Co-operate and raised no objections to the Pre-Submission of the JCS.

In summary, there has been and is a strong partnership between GFirstLEP and the JCS councils and that partnership's successful cooperation has been instrumental in the development of the JCS to date. The

partnership between the JCS councils and GFirstLEP will remain focussed on the economic growth and the success of the JCS area and work to achieve the SEP aims of a 4-way M5 junction 10 and the additional potential growth to support this will continue.

Ends

JCS Statement of Cooperation

**Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council
(Collectively the Joint Core Strategy (JCS) authorities)**

Statement of Cooperation with

Gloucestershire Airport (the airport)

1. Introduction

1.1. This statement of cooperation outlines the matter on which the JCS authorities and Gloucestershire Airport will continue to cooperate. The JCS councils and Gloucestershire Airport have had on-going dialogue through the preparation of the JCS plan as well as a longer relationship via Tewkesbury Borough Council as the local planning authority.

1.2. This statement of cooperation has two purposes. The first purpose is to support the JCS submission process and ultimately further explain the dialogue that has been on-going and in particular further clarify the airport's representation duly made during the recent publication. The second (and of no less importance) is to support the airport where possible so that its economic viability is supported by the JCS and the three partner councils in line with both national planning and aviation policy frameworks. Below is noted paragraph 1.24 of the Aviation Policy Framework, March 2013:

'The Government wants to see the best use of existing airport capacity. We support the growth of airports in Northern Ireland, Scotland, Wales and airports outside the South East of England. However, we recognise that the development of airports can have negative as well as positive local impacts, including on noise levels. We therefore consider that proposals for expansion at these airports should be judged on their individual merits, taking careful account of all relevant considerations, particularly economic and environmental impacts.'

1.3. This statement of cooperation acknowledges that the JCS supports the airport as a strategically important economic business within the area and how the continued development of the airport is within the interest of the shareholders and the wider stakeholders. It also notes that the airport is an enabler for growth of the wider Gloucestershire economy as well as the opportunities in and around the airport site.

1.4. This statement of cooperation also acknowledges the representation made by the airport during the recent JCS Pre-Submission publication process and sets out items of disagreement and defines processes to continue to discuss these items and ultimately work together and agree a way forward.

1.5. An appendix (1) to the statement of cooperation is the airport's Position Statement which has been added to help explain the airport's objectives but is not an issued document of the JCS. This gives an indication of the growth plans of the airport as well as explanations of the airport's various intentions to which this statement of cooperation, as well as the various related planning processes of the three authorities, seeks to support.

JCS Statement of Cooperation

2. Economic Potential

- 2.1. The airport wishes to see a reflection of the strategic economic importance of the airport within the JCS, which it considers is currently not expressed within the Pre-Submission plan.
- 2.2. The JCS authorities fully support the airport as a strategically economic important business and network within the JCS area and its wider context.
- 2.3. *JCS response:* It is proposed that the following wording is included into the JCS before paragraph 4.6.10,

“Gloucestershire Airport is a general aviation airport that handles over 70,000 aircraft movements every year, many for business purposes. The JCS supports the Strategic Economic Plan for Gloucestershire which states that the Local Enterprise Partnership aims to optimise the contribution and benefit that Gloucestershire Airport and the land around it can make to local communities and the economy.”

3. Mapping Issues

- 3.1. New access into airport
 - 3.1.1. The airport wishes to see the land associated with the implemented access point shown as an essential operational area of the airport.
 - 3.1.2. *JCS response:* is to incorporate this in line with TBC planning application reference 06/01669/FUL and mark the land as pink (Essential Operational Area of the airport) but retained within the Green Belt.
- 3.2. **Removal of essential operational land at Boarding Kennels and Cattery**
 - 3.2.1. The airport wish to see this area removed from Essential Operational Area of the airport.
 - 3.2.2. *JCS response:* is to incorporate this in line with TBC planning application reference 06/07671/FUL and remove the pink shading (Essential Operational Area of airport) and mark the land as white but retained within the Green Belt.
- 3.3. **Jet Age Museum**
 - 3.3.1. The airport wishes to see the Jet Age Museum taken out of the Essential Operational Area of the airport (pink).
 - 3.3.2. *JCS response:* is to incorporate this in line with TBC planning application reference 06/07671/FUL and mark the land as Non-Essential Operational Area of the airport (blue) but retained within the Green Belt.
- 3.4. **Other developed areas**
 - 3.4.1. There are two small areas of land adjacent to Bamfurlong Industrial Park which are inset within the Green Belt and form part of the employment area. The airport wishes to identify

JCS Statement of Cooperation

that they are within their ownership and so mark them as being within the Non-Essential Operational Area of the airport.

- 3.4.2. *JCS response:* No change. These areas are within existing employment area and outside the Green Belt. Placing them as part of the Non-Essential Operational Area of the airport would be more restrictive and require the use to be business use to support the airport. This would restrict the availability of certain job generating uses in the future should this land be redeveloped. The use of land within the protected employment area has the flexibility to support the airport.

3.5. Non-Essential Operational Area of the Airport

- 3.5.1. This designation predominantly aligns to the existing developed South East Camp area which the airport considers limits the flexibility of the airport to further develop its core businesses. To enable the airport to achieve this goal, they have requested that additional land is changed from 'essential operational area' to 'non-essential operational area'. The airport considers that this would enable new developments which can further support the core business of the airport.

Noted within the airport's Position Statement (appendix 1), are the change to the four areas within the airport boundary, namely land to the west of Meteor Business Park, land either side of the north-south runway (18/36) contiguous with Meteor Business Park and Bamfurlong Industrial Estate, land to the east of South East Camp area and finally the strip of land to the west of South East Camp and terminal area. *(These areas are denoted within the airport Briefing Note).*

- 3.5.2. *JCS Response:* The JCS authorities recognise the aspirations of the airport in the objective of strengthening its core businesses and trust that the changes incorporated at the final stage of the JCS prior to submission go some way towards the indicating the intent of the authorities *(The Submission JCS incorporates some minor changes to South East Camp as well as designation as non-essential the land to the West of Meteor Business Park)*. In advance of any JCS review, other opportunities through which to make further changes to the designations at the airport will be through the Tewkesbury Borough Plan as the appropriate mechanism.

TBC as the local planning authority are responsible for both plan making and decision taking with regard to planning applications. In the event that the airport submits a planning application to Tewkesbury Borough Council, the application will be determined on its merits. It is noted that matters to go into the planning balance could include issues such as existing employment uses in and around the defined airport boundary in relation to the ongoing viability of the airport.

3.6. Permitted Development Rights

- 3.6.1. Under Schedule 2, Part 18, of the Town and Country Planning (General Permitted Development) Order 1995 GPDO, certain aviation development is permitted. Using these rights, the airport has entitlement to certain rights and has indeed, exercised these development rights to build such structures as hangars.

- 3.6.2. *JCS Response:* the airport and the JCS authorities acknowledge that at this stage of the JCS plan preparation that delegated authority exists only to make 'minor' changes to the plan.

JCS Statement of Cooperation

The changes proposed above are considered to be minor and provide clarification and corrections to the JCS. Nothing in the JCS is intended to over-rule the airport's legitimately held rights under the GPDO.

Tewkesbury Borough Council is the local planning authority within which the airport is located and it is recognised that the JCS will be supported by the emerging 'Tewkesbury Borough Plan' for this area. There is an opportunity through the preparation of this lower level plan to consider further changes to the policy extent of both the 'Essential Operational Area' and 'Non-Essential Operational Area' of the airport.

4. **Strategic Allocation at North Churchdown**

- 4.1. It is noted that within the representation the airport '*considers that including the land at North Churchdown for residential development is not sound when considered against the NPPF¹*'.
- 4.2. On further dialogue between the airport and JCS authorities, the airport accepts that the indicative plans for the strategic allocations, set out in policy SA1 of the JCS, denote green as 'green infrastructure and other supporting infrastructure' (appendix 2). The airport has been concerned that it was not clear what will or will not be permitted within this area and maintains the objection that any infrastructure must not obstruct the airport as denoted in the protected surfaces chart (appendix 3) nor result in infrastructure which had future uses which could result in concerns over the level of noise experienced as noted on the noise contour chart (appendix 4).
- 4.3. Whilst the airport, based upon the current legislation and guidance, does not object to the Strategic Allocation at North Churchdown, it wishes it to be noted that, whilst the indicative land designated for housing lies outside the 57 db Laeq contours, which marks the onset of significant community annoyance from aircraft noise, the guidance on acceptable levels of noise exposure from airports could change in the future and may bring additional areas within effective control contour.
- 4.4. *JCS Response:* The JCS agrees with this clarification and notes the points raised concerning the development constraints on other supporting infrastructure within the strategic allocation North Churchdown (SA2) indicative green zone. It also notes that the allocation at North Churchdown is based upon current planning legislation including the accepted level of noise exposure in relation to community annoyance.

¹ From Gloucestershire Airport's representation dated 13 August 2014, pg. 4

JCS Statement of Cooperation

5. Signatures

JCS Authorities:

Gloucester City Council



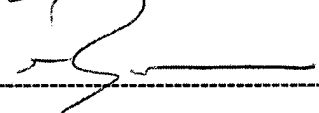
Cheltenham Borough Council



Tewkesbury Borough Council



Gloucestershire Airport




6. Appendices

1. Airport Position Statement – 21 November 2014
2. Extract from York Aviation Gloucester Airport Report to GCC 2013 (redacted Dec 14)
3. JCS strategic allocation at North Churchdown (SA2)
4. Airport protected surfaces
5. Airport daytime noise contours chart 2008

JCS Statement of Cooperation

Appendix 1

Joint Core Strategy Position Statement Date: 21 st November 2014	
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Executive Summary

1. This Position Statement updates the previous representations made by Gloucestershire Airport in relation to the Joint Core Strategy.
2. The Airport is the busiest general aviation airport in the UK and, in 2013, activities at the Airport site supported 1,515 FTE jobs and £67 million of GVA. Government policy encourages local planning authorities to support the growth of general aviation airports in the light of their wider economic importance and seeks to ensure that the planning system supports a viable network of such airports. Support for growth at Gloucestershire Airport is also provided by the GFirst economic strategy.
3. Whilst recognising the acknowledgement within the JCS that the Airport is a developed site within Green Belt and the principle of zoning the site into areas for Essential Operational Uses only and those where Non-Essential Operational Uses which provide wider support to the operation of the Airport, Gloucestershire Airport is concerned that the current zoning does not provide sufficient flexibility to ensure the necessary enabling development which is vital to secure the ongoing viable operation of the Airport. The zoning of additional areas of the Airport site as for Non-Essential Operational Uses, contiguous to the already developed, is sought to provide such flexibility and in recognition that parts of the site physically could not be used for Essential Operational Uses as they have no access to the operational airfield.
4. The Airport's position in relation to the potential impact of housing development on the North Churchdown (Parton Farm) site is to minimise the risk of such development impacting adversely on its long term operation and development. There are two principal areas of concern, safety and noise. These need to be taken into account in any development of the site.
5. The Airport, therefore, welcomes the proposed zoning of the land abutting the Airport with the North Churchdown site as supporting for infrastructure rather than as a core housing allocation as this ensures that the Airport's protected surfaces are safeguarded and housing is not permitted within the 57dB Laeq contour. Uses acceptable in this area would include roads and public recreation spaces but would not include schools or other essential social facilities where the activities might be sensitive to the impact of aircraft noise.

Background

6. This statement updates the position of Gloucestershire Airport, as set out in submissions dated 23rd September 2013, 10th December 2013 and 13th August 2014, in relation to the submission version of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS), taking into account the adjustments which have been made to some policies and plans and having regard to the business

JCS Statement of Cooperation

objectives of the Airport, recently confirmed by the shareholders; Cheltenham Borough Council and Gloucester City Council.

7. In December 2013, both Cheltenham Borough and Gloucester City Councils reconfirmed their support for Gloucestershire Airport, which is owned by the two councils, in recognition of the existing and potential future contribution which the Airport can make to the economy of the local area. In 2013, the Airport, and its associated cluster of businesses, supported 1,515 FTE jobs and over £67 million of GVA² as well as being at the heart of a strong local aerospace cluster and contributing substantially to attracting other businesses to the area. In reconfirming their support for the Airport, the Councils made clear that they wished to see the Airport develop a robust business plan to secure profitable growth and expand its role in supporting the local economy. The evidence base for this support is attached at Appendix A [release from confidentiality subject to confirmation].
8. The GFirst Strategic Economic Plan for Gloucestershire (March 2014) recognises the Airport as an enabler for growth in the wider economy and sees growth opportunities in and around the Airport site, which lies at the heart of the Growth Zone. Specifically, the Strategic Economic Plan aims to optimise the potential contribution and benefit which Gloucestershire Airport can make to the local economy by:
 - *“Supporting the development of proposals, including alternative governance models and access to investment funding, to ensure the airport remains the most successful in the UK.*
 - *Identifying and highlighting opportunities to encourage ancillary activities and related development of land within and adjacent to the airport boundary.”*
9. Delivering this growth will require the Airport to be able to develop additional supporting operational infrastructure and facilitate the development of ancillary activities within the non-operational areas of its land holding.

Policy Context

10. The National Planning Policy Framework (NPPF) sets out the importance of the planning regime providing for the growth of airports and the role which they can play in local economic development:

“When planning for ports, airports and airfields that are not subject to a separate national policy statement, plans should take account of their growth and role in serving business, leisure, training and emergency service needs. Plans should take account of this Framework as well as the principles set out in the relevant national policy statements and the Government Framework for UK Aviation.”³
11. The Aviation Policy Framework (APF) also makes clear the requirement for local authorities to have regard to the APF in developing plans and policies. The APF is specific in its support for maintaining a *“viable network of business and general aviation”*, including a network of aerodromes providing access for business and general aviation (GA) aircraft⁴. Gloucestershire Airport is the busiest such airport

² Source: York Aviation for Gloucester City Council

³ National Planning Policy Framework, Department of Communities and Local Government, March 2012, paragraph 33.

⁴ Aviation Policy Framework, Department for Transport, March 2013, Paragraph 1.86.

JCS Statement of Cooperation

in the UK presently, however its ongoing viability depends on its ability to productively utilise its land assets to support the continued development and enhancement of its aviation role and ensure that the quality of its facilities is maintained.

12. Most recently, the Government has confirmed its support for a strategic network of general aviation airfields and emphasised the important role of planning in supporting the growth of such airports⁵.

“we do expect that, when planning for ports, airports and airfields that are not subject to a national policy statement (likely to cover most, if not all, general aviation airfields), plans should take account of their growth and role in serving business, leisure, training and emergency service needs”

13. It is in this context that Gloucestershire Airport seeks further modifications to the JCS land zoning and allocations to ensure that these broader policy objectives can be realised.

Land Use Designation within the Airport Site

14. The Airport welcomes the recognition within the JCS that the Airport is a developed site within Green Belt (Policy SD6). It welcomes the support given, in principle, to the differentiation within the Airport site between areas reserved for operational uses and those areas where a broader range of uses may be permitted which support the development of the Airport more generally. Some minor adjustments to the overall area shown as within the Airport boundary have already been made since the pre-submission draft, in particular relating to the runway end safety area at the western end of the main runway and the northern part of the North Churchdown site (Figure 1) to reflect the actual boundary of the airport land and the necessary safeguarded areas.

⁵ Government response to the GA Challenge Panel final report, October 2014

JCS Statement of Cooperation

Inset 1 - Proposed Changes to Green Belt Boundary at Gloucestershire Airport

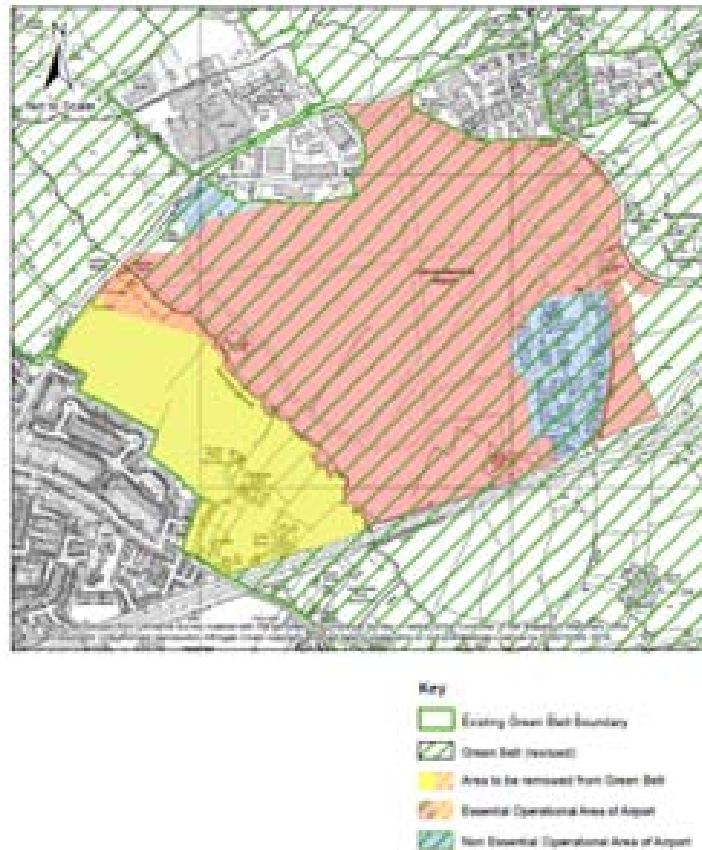


Figure 1

15. Within the Airport site, two distinct land use zonings are identified:
 - Essential Operational Area, where only buildings or structures essential to the operation of the airport and requiring an airport location will be permitted;
 - Non-Essential Operational Area, where business uses which support the Airport will be permitted.

16. This latter area, as currently defined, relates to the existing developed South Camp area alone, which gives little or no scope for the Airport to develop further uses which would support the core Airport business or sustain a growing economic contribution.

17. The Airport seeks the designation of additional areas within the Airport site as 'Non-Essential Operational Area', allowing the necessary additional flexibility to permit enabling development within is essential to support the viability of the Airport and the ongoing maintenance and development of core airport assets. This is notwithstanding the availability of GPDO rights for some types of development, e.g. hangars within the Essential Operational zone. Without such development flexibility, there is a real risk that the Airport will be unable to maintain and develop its aviation assets to the high standard required to support its role as the UK's leading GA airfield.

JCS Statement of Cooperation

18. Within the Airport site, we have identified the area which the Airport wishes to see designated as for Non-Essential Operational Area, shown in blue, and where the Airport seeks flexibility to develop non-essential but supporting uses in order to secure its ongoing viability and optimise its economic potential. These are contiguous to the already developed parts of the Airport site. The Airport seeks re-designation of these zones to Non-Essential Operational Area status. These are illustrated on the attached plan (Figure 2).

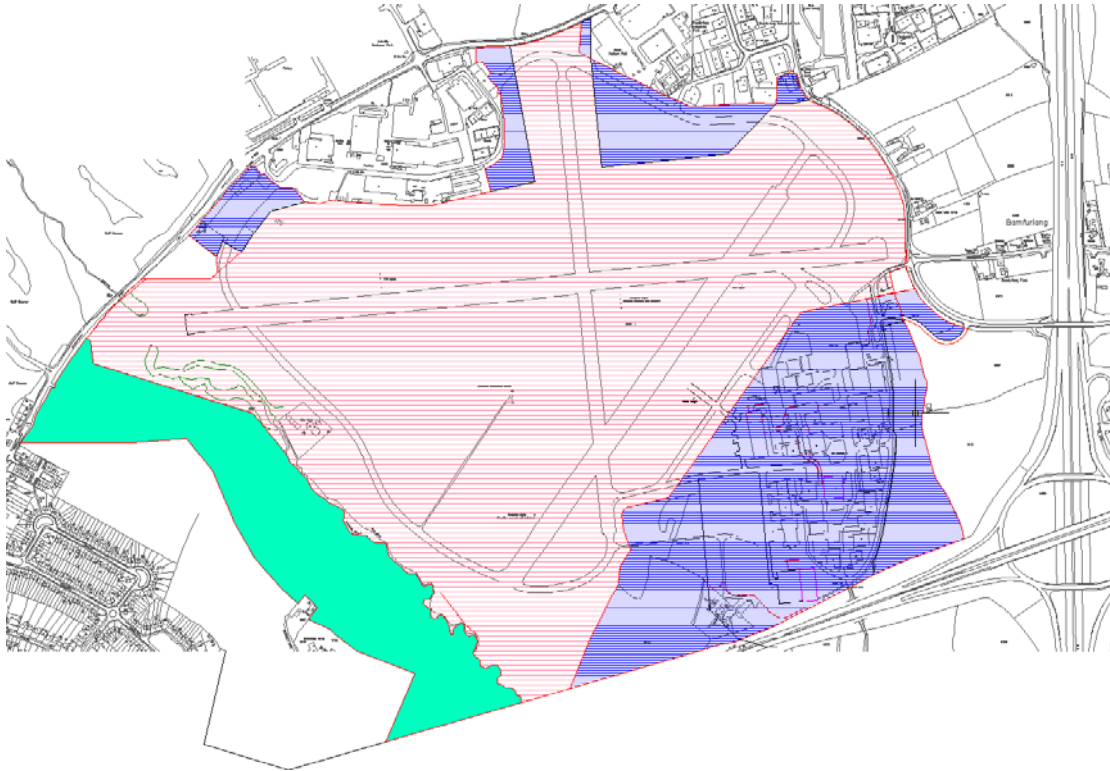


Figure 2

19. The remaining areas of the Airport site (shaded pink) would not be suitable for development at the present time and represent the Essential Operational Areas of the site. Built development would not be acceptable within this zone as it represents the safeguarded aircraft manoeuvring zone.
20. In the Non-Essential Use Zone, areas bordering the Essential Operational Area would generally be prioritised for uses requiring airfield access, such as hangarage. However, areas adjacent to the Meteor Business Park and Bamfurlong Industrial Estate (outside of Green Belt) may be more suitable for the extension of uses contained within these areas. Such development would be carried out in a manner which ensures that it provides valuable financial support to the Airport business. This would include companies which are active and supportive of the aerospace cluster.
21. There is also an area of land to the east of the existing South East Camp developed area and Airport access road which is not accessible by aircraft due to the requirement to traverse the access road. As this area is not accessible from the operational airfield, it can, therefore, only support ancillary activities not requiring direct airside access to the Essential Operational Area. Supporting facilities, including offices and facilities for passengers and pilots are envisaged for this area.

JCS Statement of Cooperation

22. In order for the Airport to be able to meet the objectives of its shareholders, deliver the growth foreseen in both the GFirst Economic Plan and contribute to the Government's stated priority to secure a viable network of GA airfields, it requires additional areas of the Airport site to be available for enabling development to support the core activity, which may include both operational and non-operational uses which support the ongoing operation of the Airport.
23. The Airport therefore seeks modifications to the draft JCS land zoning allocations to ensure these broader objectives can be realised.
24. Without such development flexibility, there is a real risk that the Airport will be unable to maintain and develop its aviation assets or deliver the objectives set by the shareholders.

North Churchdown

25. The Airport's position in relation to the potential impact of housing development on the North Churchdown (Parton Farm) site is to minimise the risk of such development impacting adversely on its long term operation and development. There are two principal areas of concern, safety and noise. These need to be taken into account in any development of the site.
26. In relation to safety, there is a requirement that any development on the site does not infringe any of the Airport's safeguarded surfaces. This includes those relating to the operation of the runways as well as the protected areas for navigation equipment. These are shown on the attached plan at Appendix B. The reduced area proposed for housing allocation within the submitted JCS largely reflects the need to avoid development which would infringe the operation of the Airport.
27. In relation to noise, the NPPF and APF state that local authorities should prevent new development from being subject to significant adverse effects from noise. For airports, the 57dB Laeq contour is usually taken in the UK as the level at which there is an onset of significant community annoyance from aircraft noise. The 57dB Laeq contour is typically used to assess the effect of airport development and policy seeks to reduce the number of people exposed to noise at this level rather than increase it. As the APF points out, this does not preclude development within this contour area but the Airport considers it to be highly undesirable and likely to frustrate the Airport from realising its potential as an economic generator. Furthermore, it is possible that changes in European legislation could result in a more stringent contour being adopted in future, so resulting in more of the site being contained in the area where increases in the population exposed to aircraft noise would be considered undesirable. The Airport's current and projected future noise contours are attached at Appendix C. The area within the 57db Laeq contour is broadly similar to the area which would need to be operationally safeguarded in any event.
28. The Airport, therefore, welcomes the proposed zoning of the land abutting the Airport within the North Churchdown site (Figure 3) as supporting for infrastructure rather than as a core housing allocation. This would include roads and public recreation spaces but would not include schools or other essential social facilities where the activities might be sensitive to the impact of aircraft noise.

JCS Statement of Cooperation

Indicative Site Layout 2 - North Churchdown Urban Extension

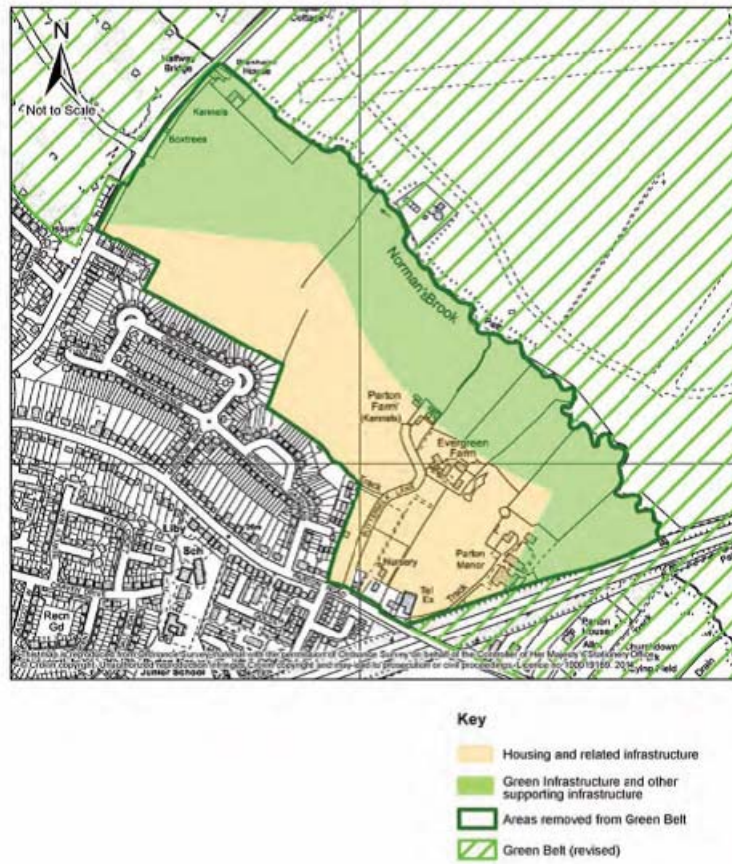
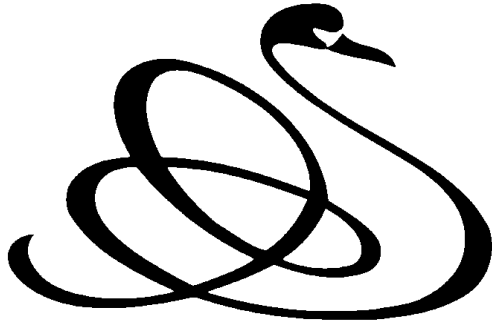


Figure 3

JCS Statement of Cooperation

6. Appendix 2 – Extract from York Aviation Gloucester Airport Report to GCC 2013 (redacted Dec 14)



York Aviation

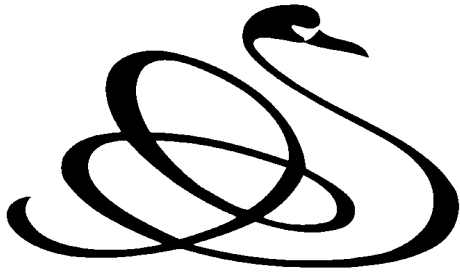
GLOUCESTER CITY COUNCIL

Extract from REVIEW OF ASSETS AT AND ADJOINING
GLOUCESTERSHIRE AIRPORT

Final Report

October 2013

JCS Statement of Cooperation



York Aviation

Originated by: Richard Connelly

Dated: 3rd July 2013
15th July 2013

Reviewed by: Louise Congdon

Dated: 17th July 2013
Revised: 24th October 2013

JCS Statement of Cooperation

4. Economic value

4.1 In this section, we examine the current economic position of the sub-region of Gloucestershire and the role which the Airport and air services play in supporting the economy.

a. Current Economic Position

4.2 The South West of England has a broad economic base, covering some of the strongest sub-regions of the UK along with some of the weakest. The sub-regional area covering Gloucestershire, Wiltshire and Bristol/Bath is amongst the strongest in the UK, ranking fifth in 2011 as having the highest GVA per capita⁶. On an index of GVA per head, this sub-region has an index rating of 105.5, ahead of the national average of 100⁷.

4.3 This region also performs well when considering the GVA impact per employee. In 2011, the GVA per employee for this sub-region was £47,900, outperforming the national average of £37,800. However, this broad sub-region includes the strong economic centre at Bristol, featuring high levels of employment in high value sectors including Banking and Finance, Professional Services and Advanced Manufacturing.

4.4 At a more local level, Gloucestershire also has a strong economic context, with around 303,000 employees in the 12-months of October 2011 – September 2012⁸. This represents an increase in employment of 6.6% compared to 2005, with employment distributed well across a number of sectors, representing a balanced economy. Table 4.1 outlines the employment split by sector in the year ending September 2012.

Table 4.1: Gloucestershire Employment By Industry 2012

	% of Employment	% of GB Employment	% Change in Employees 2005-2012
Agriculture and Fishing	1.5%	1.4%	9.8%
Energy and Water	2.3%	1.9%	26.8%

⁶ NUTS2: Top five and bottom five sub-regions by GVA per head, 2011, ONS

⁷ Ibid

⁸ ONS/NOMIS

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Manufacturing	12.9%	16.0%	-15.0%
Construction	7.9%	10.1%	-17.2%
Distribution, Hotels and Restaurants	18.3%	17.3%	11.7%
Transport and Communications	6.1%	7.4%	-13.1%
Banking, Finance and Insurance	14.5%	14.8%	3.3%
Public Administration, Education and Health	31.4%	26.5%	24.8%
Other services	4.4%	4.2%	10.9%
Unknown	0.4%	0.4%	-
Source: ONS/Nomis			

- 4.5 Table 4.1 also highlights changes in the economy of Gloucestershire since 2005. Notable changes include a significantly greater reliance on public sector employment, with absolute employee numbers growing by nearly 25% since 2005. There has been a decline of employees in manufacturing, although other key sectors of the economy, including Energy and Water and Banking, Finance and Insurance, have continued to grow.
- 4.6 Despite a perception that manufacturing is a strong growth sector for the County, the evidence suggest otherwise. In 2011, GFirst, the Local Enterprise Partnership (LEP) for Gloucestershire, found that the sector had declined by 2.5%⁹ between 2004 and 2011¹⁰, but that the largest single sub-sector of manufacturing in the County was in Advanced Engineering, at 21%. The GFirst report did highlight, however, that there had been declines in this sub-sector since 2004, amounting to a 6.3% decrease in employment¹¹, with growth in manufacturing coming from more traditional sectors, such as furniture manufacturing and wood products/cork.
- 4.7 The state of manufacturing is relevant to this study because of the clustering of advanced manufacturing adjacent to the Airport, driven in part by the Aerospace sector which grew originally as a result of aircraft manufacturing taking place at the Airport. Increasingly, the companies involved in the aerospace sector have diversified and used their expertise in other sectors, such as the motor industry.

⁹ Gloucestershire Local Economic Assessment: 2011, Section 4, Page 8, GFirst

¹⁰ The smaller decline appears to be attributable to a different base number of employees in the sector in 2004 of 38,200, compared to our own NOMIS extraction indicating 47,300 employees in 2004. Our 2012 extraction from NOMIS indicated employment of 39,200 in the sector, which is close to the 37,300 figure used by GFirst. It is not clear as to whether GFirst made some adjustment to the extracted data, or whether there is a data error between the ONS's Annual Business Inquiry (as used by GFirst) and the NOMIS database used in our analysis.

¹¹ Gloucestershire Local Economic Assessment: 2011, Section 4, Page 10, GFirst

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4.8 Overall the local economy has a strong base and a number of sectors could be determined to be of particular value, delivering higher salaries and GVA impacts, such as the Banking and Finance sector and the Energy sector. GFirst, as the LEP for Gloucestershire, outlines a vision for further growth revolving around 10 key sectors:

- *Advanced Engineering/Manufacturing*
- *Business and Professional Services*
- *Corporate Banking*
- *Construction and Infrastructure*
- *Logistics*
- *Information and Communication Technology (ICT)*
- *Creative Industries*
- *Environmental Technology (Land Based)*
- *Retail; and*
- *Tourism*

4.9 Among the key priority sectors for GFirst is the Aerospace sector, which includes direct aviation activity at the Airport as well as the purely aerospace manufacturing companies clustered in the vicinity. This approach recognises that there is some overlap between the two, albeit, as will be discussed later in this section, there is little reliance on the Airport from the core aerospace companies today.

b. Contribution of Aviation

4.10 Air services contribute to an economy in broadly two ways:

- operational impacts – those impacts related to the economic activity supported by the operation of an airport – i.e. the direct, indirect and induced effects; and
- *impact on the wider economy – the benefits derived by users of passenger and freight services from access to the connectivity provided by an airport’s services. These can manifest themselves in terms of impacts such as increased inward investment, trade, improved productivity or increased inbound tourism.*

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4.11 The overall approach that we have adopted in order to consider the economic impact of GLO is based on a framework of five categories of effect as set out in Table 4.2. This is the standard framework for analysis developed for ACI EUROPE, the trade body for European airports, and is commonly used in a wide range of airport economic impact assessments.

Table 4.2: Economic Impacts Associated with Airports		
Impact Category	Definition	Examples
Direct On-Site	Employment and GVA and wholly or largely related to the operation of an airport and generated within the Airport Operational Area	Airport operator, airlines, handling agents, control authorities, concessions, freight agents, flight caterers, hotels, car parking, aircraft servicing and maintenance, fuel storage, flying schools
Direct Off-Site	Employment and GVA wholly or largely related to the operation of an airport and generated within the surrounding region	Airlines, freight agents, flight caterers, hotels, car parking
Indirect	Employment and GVA generated in the chain of suppliers of goods and services to the direct activities	Utilities, retailing, advertising, cleaning, food, construction
Induced	Employment and GVA generated by the spending of incomes earned in the direct and indirect activities	Retailing, restaurants and entertainment
Catalytic/Wider	Employment and GVA generated by the attraction, retention or expansion of economic activity as a result of the airport's activity	Inward investors, exporting companies and visitor attractions

Source: York Aviation

4.12 It is possible to generate robust quantitative estimates of the first four categories of impact shown in the table (direct on-site, direct off-site, indirect and induced). These represent the employment and GVA supported through the operation of an airport as an economic activity.

4.13 The issue of catalytic or wider benefits is, however, considerably more complex. The impact of an airport, in this case, is accrued by users of the services. The ability to travel or the connectivity offered by an airport enables business sectors that use air services to operate more effectively, increasing productivity and output and thereby supporting GVA and employment in the wider economy. In the context of a modern developed economy, it is our view that these wider impacts can be of considerable importance.

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- 4.14 However, quantification of this wider impact in terms of GVA and employment is not possible. The relationship between air travel and economic activity is an indirect one. It is not possible to say that, for instance, a 10% increase in business passengers leads to a corresponding increase in GVA and employment through inward investment or greater productivity. It is, therefore, necessary to consider these issues through qualitative analysis and the use of broader indicators of an airport's impact.
- 4.15 In reality, GLO's overall role in the sub-regional economy is greater than indicated strictly under the direct and measurable impact definitions set out above, for three reasons:
- not all of the business units on the main Airport site are aviation related, with a limited number of tenants involved in other business sectors generating a greater impact than from Airport operations alone;
 - *further economically beneficial activity is sustained on the Meteor Business Park, albeit these are not necessarily aviation related; and*
 - *the area surrounding the Airport has a significant Aerospace, including advanced manufacturing, cluster which has developed through historic links with the Airport.*
- 4.16 Furthermore, there are some complex interrelationships between some of the companies based on or around the Airport, which sees them straddle the direct operational impact and wider catalytic impact categories. For example, one company on the Airport site provides services directly to aircraft owners, requiring airport access, but also provides advanced engineering to the Aerospace cluster adjacent to the Airport, whilst another company, based off-site in the Aerotech Business Park, provides equipment which is used on emergency helicopters as maintained at and operated by two on-site companies at GLO.
- 4.17 It is for this reason that previous economic impact assessments have tended to consider the impacts in aggregate as they are all inter-related to a degree. Here, we have attempted to distinguish the operational impacts from retaining an operational airport from the broader range of impacts sustained from activity on the site or within the wider aerospace cluster.

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c. Operational Impacts

4.18 The Airport undertook a short survey of the firms based on the Airport site to ascertain employment levels, including, among others, flying schools, the Airport company, control agencies, aircraft maintenance firms, and executive aircraft operators. This included a limited number of non-aviation related businesses on the Airport. This was supplemented with a telephone survey of the companies on the Meteor Business Park to determine the employment generated there. There is some marginal cross-over between the two, for example [--] has an aircraft hangar on the edge of the Meteor Business Park, whilst [--] operates from both the Airport site and the Meteor Business Park.

4.19 In total, 38 aviation related companies and organisations were surveyed¹², with a further 31 companies or properties (with mixed occupation) were taken into account for the non-aviation related impact. This has allowed us to estimate the measurable impact of the Airport business, including Meteor Business Park. Differentiation between those businesses which are airport related and those which are not is crucial to determining the overall value, as the GVA income per employee will vary by industry. Nationally, the average GVA income per employee across all sectors is around £37,750, but aviation tends to be a higher value sector, with an average GVA impact per employee of around £65,725. Whilst the Meteor Business Park does include significant employment in Advanced Manufacturing and Aerospace, which will bring higher GVA incomes per employee, these are likely to be offset by some of the other activities on the Park, such as tool hire shops and industrial retail outlets, hence we have chosen to use the average GVA income per employee for the non-aviation related businesses as being most representative.

i. Direct Employment

4.20 Currently, on the Airport site, there are 401 jobs which are related directly to the aviation sector, being reliant on having an operational airport. These equate to 361 Full Time Equivalents (FTEs). There are a further 59 jobs which are not directly aviation related, equating to 56 FTEs. The Meteor Business Park generates a further 805 jobs, equating to 796 FTE's¹³.

¹² 27 companies completed the full survey, the remaining on-site employers were contacted directly for their employment numbers.

¹³ There is some overlap between the Airport and Meteor BP, for example, the [--] on the Business Park is directly aviation related and therefore is included only in the Aviation impacts.

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- 4.21 By applying national GVA income per employee levels to these jobs, we estimate that those businesses which are directly aviation related contribute approximately £23.69 million to the economy each year at current prices. Airport based, but non-aviation related, businesses add a further £2.11m to the economy each year, whilst those companies based on the Meteor Business Park contribute a total of £30.03m per annum. In total, the Airport business contributes £55.84m to the sub-regional economy, with non-aviation related businesses contributing £32.34m, approximately 36% more than aviation-related activities (although to achieve this higher GVA figure, the non-aviation related businesses need to employ more than twice as many employees).
- 4.22 By way of comparison, the February 2012 study for the Airport¹⁴ of the economic value found on-site employment generated around £22.7m of GVA whilst businesses surrounding the Airport contributed a further £242m in GVA. However, the study area resulting in the latter figure was much wider and covered business land in the vicinity of the Airport that is not within the control of GCC and included businesses not operationally dependent on the Airport.
- ii. Indirect and Induced Impacts*
- 4.23 In the absence of a detailed survey of the supply chain and secondary rounds of spending, we have used a multiplier to calculate the indirect and induced benefits based on the number of direct employees. Expenditure from businesses and employees will occur over a wide area, particularly in terms of the aviation supply chain. Hence, we have attempted to isolate the value to the local economy, i.e. Gloucestershire, based our previous experience in undertaking airport economic impact assessments and in considering how income and expenditure from direct operations converts to broader indirectly related economic activity. We have, thus, used a multiplier of 0.25 to estimate the local value.
- 4.24 On this basis, we estimate that aviation related activities will generate a further 90 FTEs and £3.40m within the local economy, whilst non-aviation businesses based on the Airport generate a further 14 FTEs and £528,500 of GVA impact. Those non-aviation businesses based on the Meteor Business Park will generate a further 199 induced/indirect FTEs, contributing £7.51m of GVA to the economy.

¹⁴ *The Economic Value of Gloucestershire Airport*, February 2012, Nathaniel Lichfield & Partners

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iii. Summary

4.25 **The total contribution of the Airport business to the local economy is therefore £67.27m. This is illustrated in Table 4.3.**

Table 4.3: Direct and Indirect/Induced Employment Impacts				
	Gloucestershire Airport		Meteor	Total
	Aviation	Non-	Business	Employment
	Related	Aviation	Park	(FTE)
	Related	Related		
Direct Jobs (FTE)	361	56	796	1,212
Induced/Indirect Jobs (FTE)	90	14	199	303
Total Jobs (FTE)	451	70	994	1,515
Direct GVA (£m)	£23.69	£2.11	£30.03	£55.84
Indirect GVA (£m)	£3.40	£0.53	£7.51	£11.44
Total GVA (£m)	£27.10	£2.64	£37.54	£67.27
Source: York Aviation				

4.26 **Unlike other studies of the economic impact of Gloucestershire Airport, we have not factored in the wider employment area around the Airport, such as on other business parks within the quantified assessment as we consider that this may overstate the impact to the extent that activities may not be related to the operation of the Airport today (as distinct from forming part of the wider Aerospace cluster) and do not contribute to income earned, i.e. from on-site rentals. Instead, we have considered the Airport's role in supporting these in our assessment of the wider catalytic impact below.**

d. Wider Impact

4.36 **This wider economic and social role of airports is called the catalytic impact. The mechanisms through which this catalytic impact can operate include the following:**

- **as an important element in company location decisions, the presence of an international airport can be an important factor in:**
 - attracting new investment from outside the area, and especially companies from overseas;
 - retaining existing companies in the area, whether they had previously been inward investors or indigenous operations;
 - securing the expansion of existing companies in the face of competition with other areas;

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- *promoting the export success of companies located in the area by the provision of passenger and freight links to key markets;*
- *enhancing the competitiveness of the economy, and the companies in it, through its fast and efficient passenger and freight services;*
- *attracting inbound tourism, including both business and leisure visitors, to the area.*

4.37 There is a significant body of research that has articulated the role of air services in relation to these issues and upon which we draw. We have not sought to revisit all of this evidence here but consider the role of GLO specifically and present the broad arguments in relation to the wider role of the Airport and air accessibility in supporting the economy of the region.

4.38 It is widely accepted that for some employment sectors, access to air services can be a major factor in company location decisions although, in our experience, this is just one of a basket of reasons that companies choose certain locations. An annual survey of senior executives from 500 major European companies, focusing on issues around location decisions and inward investment¹⁵, found that “*Easy access to markets, customers or clients*” and “*Transport links with other cities and internationally*” were both identified in the top four most important factors in determining business locations in 2008 (2nd and 4th respectively). This is a well established pattern. These key factors, which provide proxies for the importance of air service access, have been amongst the top four factors for many years. Whilst these relate particularly to access by scheduled services, it is recognised that access for corporate and business aviation can be very important for high value individuals, especially where local markets are too small to support a wide range of scheduled operations.

4.39 In this context, it is important to recognise the role of air services in supporting the knowledge based sectors on which the modern economy is so dependent. Air services provide:

- *access to other parts of the organisation, particularly headquarters functions, for inward investors;*
- *access to markets for indigenous companies and for inward investors seeking to use a region as a base of operations within a world area;*
- *access to suppliers of goods and services from around the world;*

¹⁵ European Cities Monitor, Cushman & Wakefield, 2008

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→ *access to knowledge partners and complementary businesses.*

4.40 Based on the earlier analysis of the Gloucestershire economy, it is worth considering the links between key sectors and aviation. Air services are known to be of great importance to some of these sectors, such as banking and finance, which demonstrates a high propensity to make use of air services. Analysis of the 2012 UK input-output tables (data for 2010) demonstrates this by highlighting the air intensive sectors, which spend the greatest proportion of their travel budget on air transport. The top result of this can be seen in Table 4.4.

Table 4.4: Air Intensive Sectors of the UK Economy in 2012			
Sector	% of Transport Spend	Sector	% of Transport Spend
Air Transport	92.75%	Programming And Broadcasting	43.75%
Financial Service Activities	73.46%	Insurance and Pension funding	43.33%
Gambling And Betting	70.00%	Sports, Amusement And Recreation	42.45%
Head Offices activities & Management Consultancy	69.86%	Warehousing And Transportation Support	41.71%
Film, TV and Sound Recording/Production	65.85%	Repair and maintenance of aircraft and spacecraft	39.29%
Creative, Arts And Entertainment	65.12%	Auxiliary To Financial Services And Insurance	39.08%
Employment Activities	63.44%	Other Personal Services	38.10%
Office Administrative And Other Business Support	63.14%	Travel Agency, Tour Operators	37.19%
Activities Of Membership Organisations	59.26%	Scientific Research And Development	36.73%
Other Professional, Scientific And Technical	57.95%	Accounting, auditing activities; tax consultancy	36.57%
Manufacture of air and spacecraft and related machinery	56.44%	Legal activities	35.94%
Security And Investigation	53.06%	Computer Programming & Consultancy	33.85%
Manufacture of other transport equipment	51.02%	Information Service Activities	32.14%
Postal And Courier	50.71%	Repair Of Computers And Personal And Household Goods	30.43%
Property Services	48.35%	Telecommunications	29.15%
Advertising And Market Research	44.80%	Manufacture Of Motor Vehicles And Trailers	26.62%

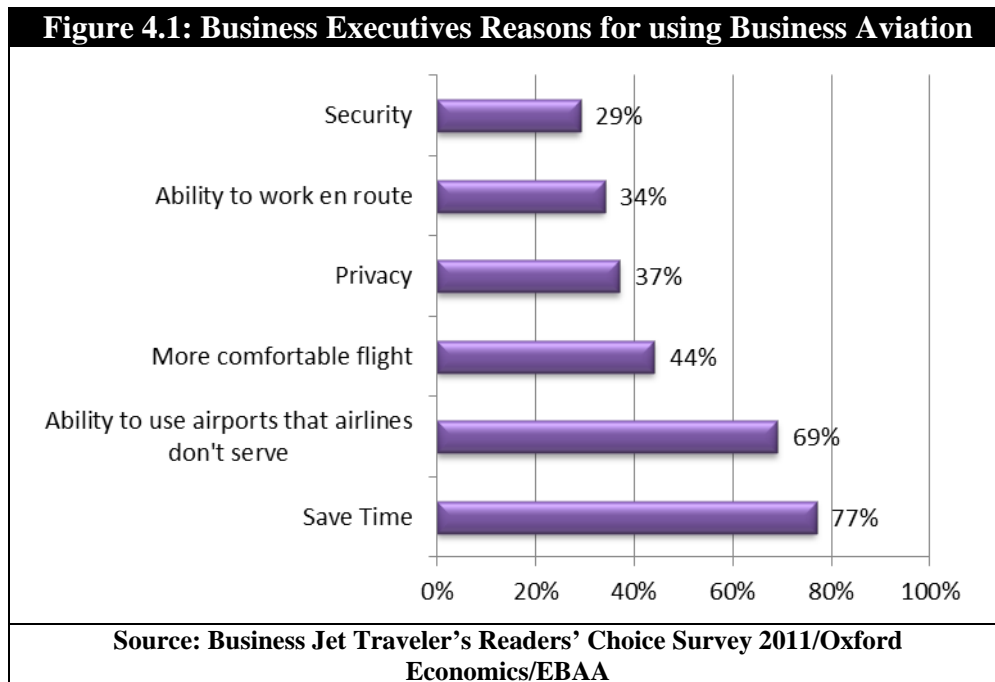
Source: York Aviation analysis of UK Input/Output Tables 2012

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- 4.41 This data shows that the financial services sector accounts for a high degree of air travel usage, with air travel accounting for over 73% of the banking/finance sector's travel demand, and 43% of the insurance sector's demand. However, the data reveals the importance of air travel to other sectors of the Gloucestershire economy, such as the Aerospace sector. It is also noticeable from the table that there is some similarity between this list, and the priority growth sectors identified by GFirst, not only including banking/finance, professional services and aerospace (advanced manufacturing), but also sectors such as telecommunications, computer services and tourism.
- 4.42 Clearly, however, the role of aviation in supporting these industries, and the business community more generally primarily arises from the provision of scheduled passenger and freight services, which are limited from GLO. This does not mean that the Airport, acting primarily as a general and business aviation airport, does not fulfil a role in supporting the economy, although its value may be less obvious than a major international airport. Its role needs to be seen in the context of the need for local access for key decision makers who may opt to use business aviation rather than drive to Birmingham, Bristol or Heathrow.
- 4.43 Through studies undertaken elsewhere, we have often found that aircraft owners will use their aircraft for both recreational and business purposes, choosing to fly themselves on business rather than taking alternatives, such as the train, driving or traveling to another airport to take a scheduled service. Whilst typically these users would not relocate their business elsewhere if an airport is not available, they tend to point towards shorter journey times and convenience as helping their business productivity, thus aiding the economic value.
- 4.44 As part of their input to this study, the Airport management provided pilots using the facility with a short survey to understand their flying behaviour. The results of this survey indicated that this same pattern of use of private aircraft for business travel purposes was also evident at GLO. A total of 55 responses were obtained, of which 17 indicated that they flew for business purposes, 12 of which were related to non-aviation businesses, representing a total combined turnover of around £73.4million. The majority of these pilots undertake up to 20 hours of flying on business annually, but a small number undertake between 20-50 hours of flying for non-aviation related businesses annually.

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4.45 A report undertaken for the European Business Aviation Association (EBAA) looked at the reasons given by business executives for using business aviation. These are shown in Figure 4.1. Crucially, the results in this figure were obtained through a survey of 1,000 executives, reflecting senior corporate level thinking.



4.46 In combination, the reasons given by executives for using business aviation and the criticality of face-to-face working relationships, particularly in key financial transactions, points towards the value of having an airport in a region, even a general aviation airport where usage may be infrequent by executive level staff, but could be important to investment decisions. We will consider this point further in considering our consultations for this study below.

i. Stakeholder Consultations

4.47 In order to understand better the role of the Airport on the wider economy, we undertook a number of consultations within Gloucestershire, speaking to individuals, businesses, business organisations and the LEP. In general, there was widespread support for the Airport, with organisations pointing not only to the role that the Airport does play, but also the role it could play in underpinning growth in the right circumstances.

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- 4.48 Stakeholders indicated that, in general, Gloucestershire is not a location for head office functions, but instead for specialist units of companies and that this drives demand for both domestic and international travel, bringing a variety of difficulties for business. One of the key routes for travel is to London, and we would not foresee any role for the Airport to serve this market given proximity. However, in line with the Aviation Policy Framework, as considered in Section 2, there is a recognition that aviation has an important role in supporting the regional office functions found in Gloucestershire as more companies invest in the region from other parts of the UK and overseas.
- 4.49 Interestingly, those representing businesses within the area did indicate that, in general, they were not aware of many businesses which were making use of the Airport, mainly due to the lack of scheduled services, as business aviation was perceived to be too expensive to provide a suitable alternative for many. However, other consultations which we undertook revealed that there is, in practice, some usage of the Airport by local businesses.
- 4.50 Although the Aerospace cluster originally developed in Gloucestershire as a result of the Airport being there, those we spoke to now indicate that the Airport plays little or no role in the retention of the sector in the area. Whilst air travel is a significant factor for these businesses, very few make any regular use of business aviation travel from GLO, instead the majority travel to Birmingham, Bristol or London Heathrow to catch flights. The location of [---] Head Office in Paris does lead to significant levels of travel to this destination and, on occasion, when there have been large groups travelling, this has led to the chartering of aircraft which have flown directly to/from GLO. However, the company indicates that on these occasions, whilst the ability to use GLO has been convenient, it was not imperative and it would not jeopardise the company's location in Gloucestershire if such charters could not be undertaken, particularly given the infrequency with which they happen. Currently, the local skills base is more important to the imbeddedness of the companies in the local economy.

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- 4.51 At present, scheduled air services are only provided to the Isle of Man (IOM) and, during the summer, to Jersey. The IOM services operate at least twice-daily during the week (with one per day at weekends). Despite the low overall volume of passengers, Citywing (the airline) indicated to us that they believe around 80% of passengers on the Isle of Man service were travelling for business purposes, which is a high percentage for any scheduled air service.. On this basis, between 10,000 and 11,500 passengers were using the Airport for business in 2012. The Jersey service, by comparison, is aimed solely at the leisure market.
- 4.52 [redacted] indicated the need for air services by their [redacted] subsidiary. They highlighted that the company made regular use of the scheduled services to the Isle of Man, linking with the important financial services sector on the Island, but did highlight that this was the result of [redacted]' business units being based on the Isle of Man. It was highlighted that there are also frequent journeys made between [redacted] and company offices in Edinburgh, and the general policy for travel within the company (reflecting the sector more generally) is to fly, thus requiring employees to travel to Birmingham (or Bristol) to travel to Scotland. However, [redacted] is soon to be divested from the main [redacted] to meet EU requirements for the Government intervention in the banking sector. Consequently, we understand that this may curb the demand for services to the Isle of Man from the company because there will no longer be any need to access the [redacted] units on the Island. However, the divestiture may generate increased travel to Edinburgh where the new [redacted] Group head office will be [redacted]. As we have been unable to verify the actual level of usage by [redacted] on the Isle of Man service, we are not able to establish the extent to which the service could be jeopardised by the divestiture. The potential use of an Edinburgh service fits with the Airport's own aspirations to attract services to Scotland.

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- 4.53 One of the consultees, [--], pointed clearly to the advantage of the Airport for their business, linking it directly to their recent growth internationally. The company does, currently, charter business aircraft for the use of the CEO and Head of European operations, citing the use of such aircraft as enabling the company to access growth markets quickly and conveniently whilst maintaining productivity. [--] highlighted a recent example as being the ability to undertake meetings in 8 countries in Europe over 6 days, which would not have been possible without the use of business aircraft. The use of such services is growing in importance and they have now purchased an aircraft to be based at GLO, and would lead to wider use of the facility by the company's executives. [--] firmly believe that their growth is being accelerated by access to the Airport and that if the Airport was not available to them, it would inhibit their growth. This, in turn, would reduce their employment growth in Gloucestershire, where head office and back office functions will continue to be based even as the company expands its retail product throughout Europe.
- 4.54 It is unlikely that [--] would not have expanded into Europe without the existence of Airport, as the Company would be unlikely to miss out on opportunities to grow. Nor is it likely that the business would have relocated away from Gloucestershire given the CEO's view that he personally wishes to remain based in the area. However, the Airport's presence has clearly brought a level of business efficiency which is benefitting [--] and could be benefitting other firms now or in the future. This contributes to the productiveness of the local economy
- 4.55 GFirst also drew attention to the recent investment made by the [--] in Gloucester and the role the Airport may have planned in enabling this. The Chairman of the Group made a small number of trips to Gloucester by private helicopter, using the Airport and speeding up access to the region. It is quite possible that the investment would have happened without access to the Airport, if [--] saw an opportunity to be exploited. However, the ability to fly into GLO, may have been an enabler to speed up the investment decision, or potentially to make the City more attractive when compared to other opportunities. This would be consistent with studies into the merger and acquisition markets, which highlight the particular importance of air service access to these activities¹⁶.

¹⁶ *Doing The Deal, 2012, A Netjets Europe Study of European M&A, Mergermarket, 2012*

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4.56 In their role of generating economic growth, GFirst believe that this is the key reason for retaining the Airport in its current form, the ability to make Gloucestershire more attractive than alternatives for inward investment. Whilst it is difficult to provide hard evidence for this, we have found in other similar studies that areas without a local airport find it difficult to get on the shortlist for inward investment, albeit that there may ultimately be other factors such as site availability, labour supply or financial incentives which clinch the deal. There is significant anecdotal evidence that having an airport contributes to a ‘feel good’ factor about an area which gives others the confidence to invest. We believe that this applies equally to the Gloucester area.

ii. Journey Time Savings

4.57 Journey time savings are a further measure of the benefit which having an airport brings to local travellers through more convenient access to air services. These savings are also a measure of the way in which air service accessibility contributes to business productivity. User benefits, which are an amalgam of journey time and air fare savings, form one of the key measures of the benefit of airport or air service development used in both Government policy and in assessing the case for public sector investment in air services (or retention of) or the development of airport infrastructure.

4.58 In estimating the value of journey time savings in relation to GLO, we have used a simple calculation based solely on the journey time of passengers who, without scheduled air services, would be displaced to using either Birmingham or Bristol Airports. It is assumed that 50% of passengers would be displaced to each airport and the passengers are split by journey type, business or leisure with each of these having a different value of time assigned to it¹⁷. The total time savings are then multiplied by the respective value of time to provide an overall financial value of time saved through the provision of the scheduled air services from Gloucestershire Airport.

¹⁷ The values of time are taken from those used by the Department for Transport in the preparation of the Future of Air Transport White Paper, factored up to 2013 values and adjusted for future years taking into account estimates of future inflation and earnings growth.

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- 4.59 Based on an assumption of 80% business usage of the Isle of Man service (the mid-point in the airline's estimate) and 100% use of the Jersey service by leisure passengers, then, based on 2012 passenger numbers and 2013 values of time, the potential journey time savings for the local economy of having Gloucestershire Airport in place are £743,700 per annum. We go on to use this figure in our assessment of the strategic options for the Airport in Section 5 of this report.
- 4.60 This value of time relates solely to those passengers using scheduled services and does not include anyone travelling to/from the Airport on business aircraft, or flying themselves where appropriate as we do not know sufficient about the journeys or the options available to enable us to place a value on these time savings. Nonetheless, such travellers clearly derive some value from being able to use GLO rather than alternatives, which could add materially to the total value of time saved through use of the Airport.
- 4.61 If scheduled services were suspended then the effect would be a cost to users equivalent to the savings currently being realised. This would reduce the efficiency and productivity of businesses based in the area. There is some risk that, if the Isle of Man service is underpinned by [--], the services could be lost which would add some of this cost burden on to the remaining businesses who are using the service ([--] themselves will have no additional costs if they do not have need of the service). This could ultimately impact on business location decisions if it becomes less productive to locate in Gloucester and the surrounding area compared to other locations.
- e. Conclusion
- 4.64 The Airport currently contributes around £27.1m of direct and indirect GVA to the region through aviation related activities, contributing a further £2.6m from non-aviation activities on site and £37.5m of GVA income from the Meteor Business Park. Typically, aviation related salaries have a distinct premium over average salaries and this is reflected in the GVA per employee of the aviation and non-aviation areas of the business.
- 4.65 There could be potential for further increases in this impact, although the extent of such growth may be limited if further hangars are not provided as existing employers simply maximise their current facilities but are unable to grow further.

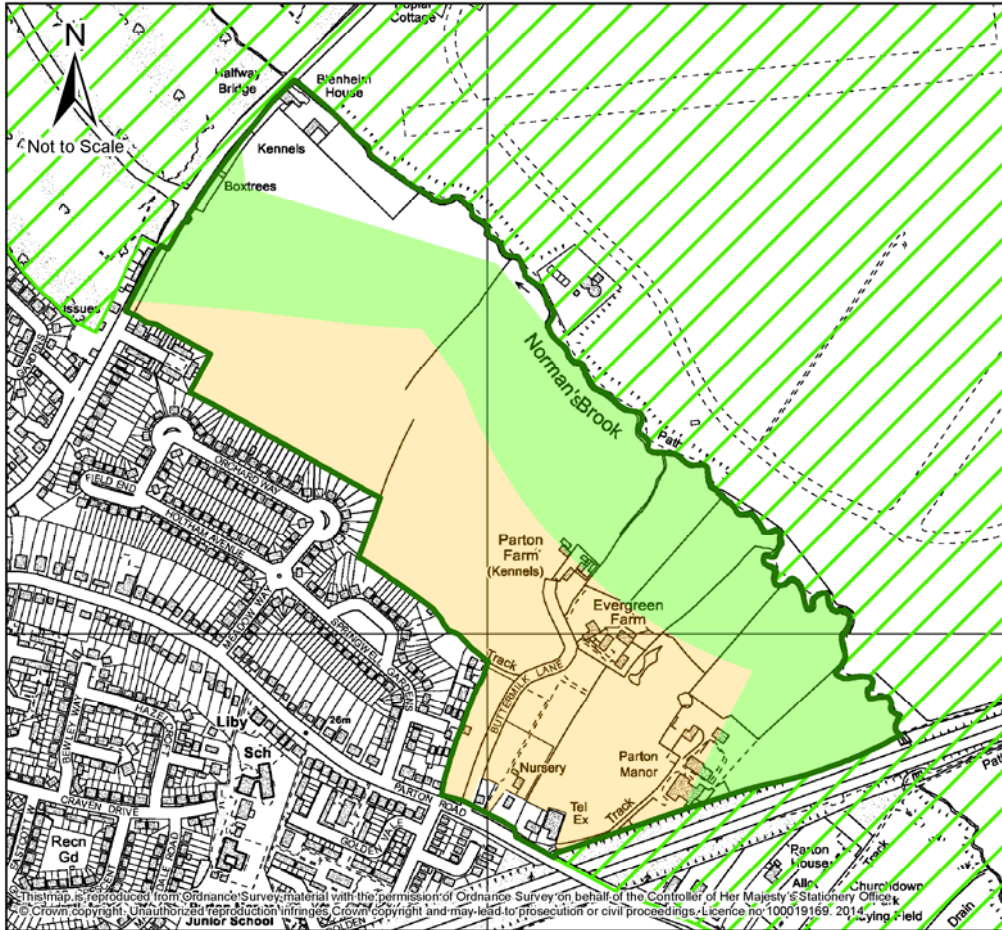
JCS Statement of Cooperation

- 4.66 Although the Airport is primarily a business aviation airport, reducing the extent to which the local population is able to take advantage of services, the limited scheduled services do have some measurable user benefits, amounting to savings to users of £743,700 per annum, largely driven by the high business use of the Isle of Man service. There would be scope for increasing these benefits if further scheduled services could be attracted, quite possibly to a Scottish destination and, in particular, to Edinburgh given the new ownership structure of [--] with the new parent's headquarters being located in Edinburgh. Such benefits ultimately translate into business productivity.
- 4.67 There are examples of airport users enhancing their business efficiency through use of the facilities. In particular, the [--] indicates that it has enabled faster growth of its business, whilst private pilots currently representing businesses with a combined turnover of £73.4m also undertake flying from the Airport for business purposes.
- 4.68 Although the Aerospace cluster originally developed in the area as a result of the proximity of the Airport, very few companies within the cluster now have any reliance on the Airport and indeed could continue to operate even if the Airport was closed in the future.

JCS Statement of Cooperation

Appendix 3

Indicative Site Layout 2 - North Churchdown Urban Extension

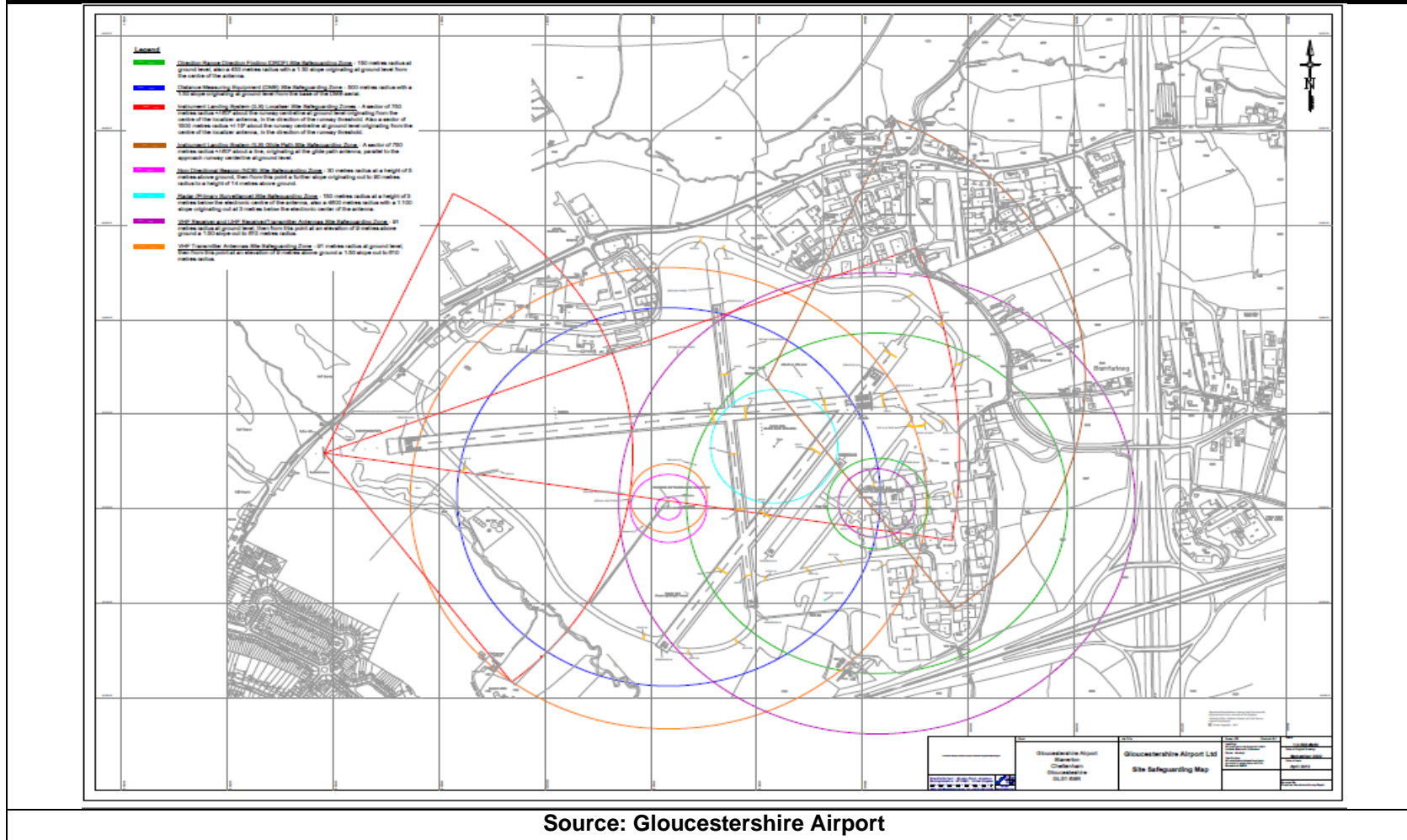


Key

- Housing and related infrastructure
- Green Infrastructure and other supporting infrastructure
- Areas removed from Green Belt
- Green Belt (revised)

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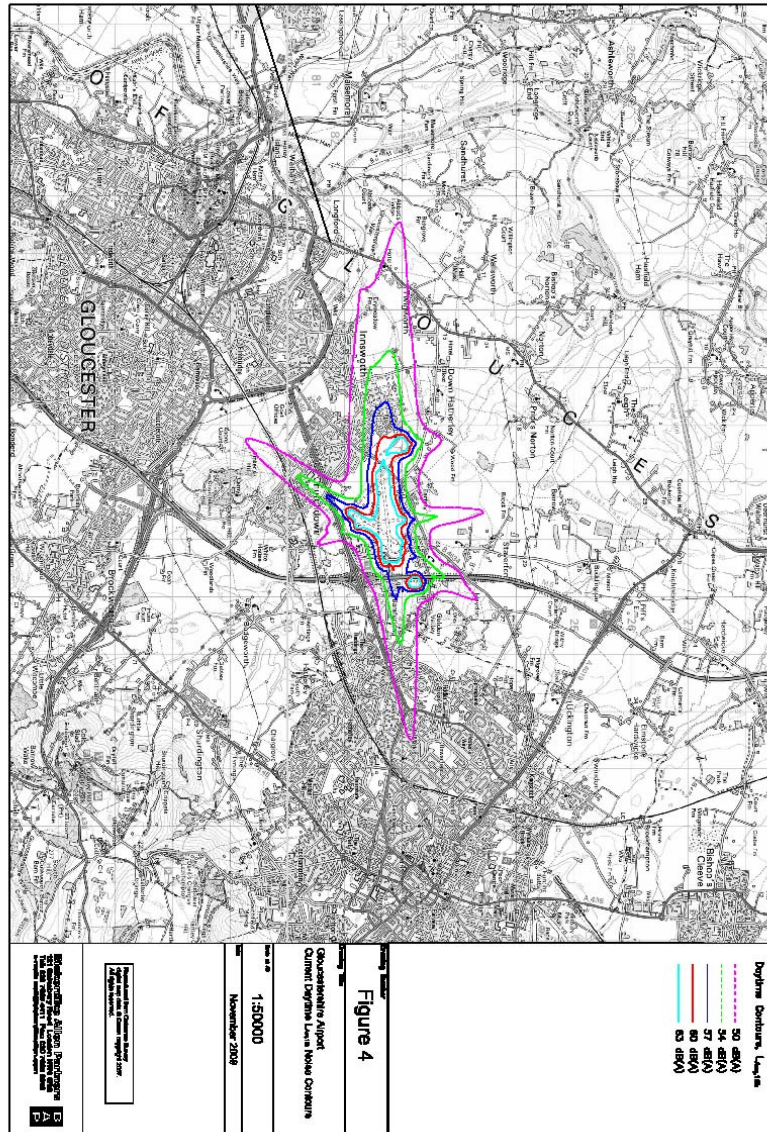
Appendix 4: Current Airport Protected Surfaces



Source: Gloucestershire Airport

JCS Statement of Cooperation

Appendix 5



JCS Meeting note

**Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council
(Collectively the Joint Core Strategy (JCS) authorities)**

Meeting note with

**GVA on behalf of Defence Infrastructure Organisation (MoD)
3 October 2014**

Meeting attendees

**HJ, MB, JW –Tewkesbury Borough Council
Matthew Fox (GVA), John Rose (AMEC)**

These notes have not been formally agreed with DIO. DIO's position in relation to the Joint Core Strategy is set out in the representations submitted by GVA. It is considered that a Statement of Common Ground could be drafted to clarify areas of agreement and disagreement.

1. Background & Purpose of meeting

- 1.1. The JCS councils and DIO have had on-going dialogue through the preparation of the JCS plan. It is acknowledged that the MOD site at Ashchurch has been declared surplus to requirements and will be available for redevelopment during the lifetime of the JCS plan period.
- 1.2. GVA made representations on behalf of DIO during the recent JCS Pre-Submission publication process and the meeting explored some of the areas of dis-agreement to defined processes to continue to discuss these differences and ultimately work together and agree a way forward.

2. Policy SP1 – The need for new development

- 2.1 GVA question why the higher end of the NLP job forecast range has not been used within the plan, though it is suggested that it has been and that the level of housing and employment is not balanced. It is unclear why NLP baseline's assessment of employment land is suggested as between 34 and 60 hectares, but the actual report refers to between 45.5 and 6.21 hectares. Clarity should be provided as to whether the allocation 62 hectares is B class or job generating uses.
- 2.2 The JCS acknowledge that there is a lack of clarity within the Pre-Submission Document and that this will be set out more clearly within the OAN and Economic Topic papers to be revised and submitted to the Examination.
- 2.3 The JCS authorities consider that the level of housing and employment is balanced and that the level of housing proposed is capable of supporting the highest job forecasts for the area. Further analysis has been undertaken by CCHPR on this issue, which demonstrates how this approach is both sound and justified; this is explained in the revised OAN topic paper and in a separate report by CCHPR.

JCS Meeting note

Level of employment land at MoD Ashchurch

- 2.4 GVA consider that, MoD Ashchurch provides an unique opportunity as it is the only predominantly brownfield strategic allocation within the JCS. However it is considered that the level of employment land is unjustified and diminishes the opportunity to make efficient use of the land for housing development.
- 2.5 JCS response: It is agreed that the MoD Ashchurch site is a significant predominantly brownfield redevelopment opportunity within the plan period. It is also accepted that this site is likely to be more problematic to bring forward for development given the level of contamination associated with the site. It is not agreed that the level of employment land is unjustified but it is accepted that the level of employment land will be a matter for masterplanning of the site. The strategic allocations of employment land allocated within the JCS provide flexibility for employment needs not anticipated by the evidence base.

Housing numbers and trajectory

- 2.6 GVA considers that more than 2,125 dwellings can be delivered in the plan period on the strategic allocation and this should not be seen as a ceiling. It is also suggested that delivery can be brought forward early and that the trajectory should be more flexible
- 2.7 The JCS authorities do not consider this to be a maximum figure, rather that the trajectory indicates what is realistic and achievable. If the strategic allocation can be brought forward more quickly this would be welcomed in principle.

Viability

- 2.8 GVA consider that the viability work done to date to support the JCS is incomplete and that it does not have sufficient regard to brownfield land and the likely associated costs thereof.
- 2.9 The JCS authorities acknowledge that the Stage 1 Viability report published June 2014 focusses on viability assessments of local development typologies and representative development schemes and does not provide sufficient reference to schemes on previously developed land which would be of relevance to the MoD strategic allocation. It should be noted that an Addendum to the Stage 1 which provides more typologies is being produced alongside the Stage 2 Viability work which will provide more detail on this subject. It is recognised that there is a greater likelihood of viability issues relating to the redevelopment of the brownfield part of the strategic allocation above the other strategic allocations and this will be considered on a site by site basis. It is not considered that a separate policy is required to specifically respond to brownfield sites.

Policy SD12 – Space Standards

- 2.10 GVA suggests that policy should refer to Government’s response to ‘optional’ national space standard.
- 2.11 JCS authorities do not consider that the policy should be amended and that development would not to conform to Building Regulations.

JCS Meeting note

Policy SD13 – Affordable Housing

- 2.12 GVA's position is that the evidence for 40% affordable housing is not available and that these figures are not supported by viability assessment.
- 2.13 The JCS authorities have set out evidence for 40% target as part of Housing Background Paper. Paragraph 2.8 refers to additional viability work being undertaken. Policy SD13 does refer to developers providing a viability assessment to demonstrate if/why they cannot meet affordable housing requirements in full. A brownfield site is likely to have higher development costs and may well require a level of flexibility not afforded to greenfield sites.

Policy SA1 – Strategic Allocations

- 2.14 GVA contends that the level of employment land being allocated in Tewkesbury exceeds the need identified. GVA also make reference to the SEP insofar as it highlights that the 20ha of land at the MOD Ashchurch Strategic Allocation will be developed as a 'medium density office employment use'.
- 2.15 The JCS authorities acknowledge that a higher level of employment land is being provided within Tewkesbury Borough, but this is a joint plan which helps towards meeting the unmet development needs of two other authorities and should be considered in the round. The level of employment development being allocated meets the strategic employment needs of the three authorities collectively, and this has been achieved across a number of strategic allocations.
- 2.16 Notwithstanding the above, the site at MOD Ashchurch is the only strategic allocation which refers to replacement of existing employment land rather than the allocation of employment land which takes the overall JCS provision beyond the 60 hectares. To remove or alter the level of replacement employment development at this site would not be within the scope of minor changes within which the delegated authority permits.
- 2.17 The Local Enterprise Partnership has input into the optimum locations for employment development and the area around Ashchurch is regarded as a key employment location for growth which is reflected in the Strategic Economic Plan for Gloucestershire. Given the MOD Ashchurch site is currently a large employment site close to Junction 9 of the M5, the expectation would be to retain a significant amount of land for future employment uses as part of a wider mixed use development, the detail of which can be considered through more detailed master planning work. It should be borne in mind that the development industry generally has suggested that we allocate more employment land in the JCS area rather than less.
- 2.18 Regarding the SEP statement concerning the employment use, it is advised that the JCS authorities have not written this statement, nor have the control to alter it. It is accepted that the future employment use on the site has not been pre-determined and there is flexibility surrounding the 'job-generating' uses.

JCS Statement of Cooperation

**Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council
(Collectively the Joint Core Strategy (JCS) authorities)**

Statement of Cooperation with Sport England

1. Introduction

1.1 This statement of cooperation acknowledges the representations made by Sport England during the recent JCS Pre-Submission publication period. It sets out items of disagreement and defines ways in which the JCS authorities and Sport England will continue to work together in the future.

1.2 This statement of cooperation acknowledges that Sport England provides expert advice to the Government and local authorities on sporting matters and has a statutory obligation to be consulted on planning applications that involve the loss of playing fields.

2. Evidence base

2.1. Sport England ~~suggests~~ advises that the ~~JCS evidence base~~ does not take account of the requirement in paragraph 73 of the National Planning Policy Framework (the NPPF) to be based on robust and up-to-date assessments of the needs ~~effor~~ for open space, sports and recreation facilities and opportunities for new provision.

2.2. At a meeting held on 7 October 2014, the JCS representative explained that it was the view of the JCS authorities that the JCS was a strategic plan, concerned only with addressing the strategic matters on which the three JCS authorities need to cooperate, most critically, overall housing and employment land figures and the establishment of eight strategic allocations. Borough and City Plan DPDs for each district will consider matters such as local site allocations and an approach to sporting provision including the planning for playing fields and other recreational matters. The JCS representative has also confirmed (having spoken with JCS partner authorities after the meeting) that Gloucester have started a playing pitch assessment and Cheltenham and Tewkesbury will consider the need for sport and recreation provision as part of the ongoing work for their Borough Plans.

2.3. Sport England suggested at this meeting that paragraph 1.20 be amended to clarify this distinction regarding the evidence base.

2.4. *JCS response:* The JCS authorities do not consider it necessary for reasons of soundness to make this change. However, they do undertake to keep Sport England informed of the progress of the playing pitch assessments they have commissioned/ will commission and will invite Sport England to comment on Borough and City DPDs.

3. Policy INF4

3.1 The JCS authorities welcome Sport England's broad support for this policy. The JCS authorities have also noted the suggestion that the policy be amended to make specific reference to the Green Infrastructure Strategy or an appropriate sporting and recreational strategy.

JCS Statement of Cooperation

3.2 *JCS response:* The JCS authorities do not consider it necessary for reasons of soundness to make any further changes to this strategic policy. The provision for playing fields or other sporting provision will become apparent in the research that will be completed by each of the three JCS authorities and any need for additional playing fields will be addressed through development management policies and/or site allocations in the lower level Borough and City Plan DPDs. JCS policies INF4, 5 and SD5 alongside NPPF allow for this. Because the JCS is a strategic document, it is expected that through the course of its implementation different strategies on playing fields and sports provision will emerge. Therefore the JCS authorities have sought to increase flexibility by not making specific references to studies and strategies which may quickly date.

4. Paragraph 5.5.5 of the Plan

4.1 The JCS authorities acknowledge Sport England's support for this policy. The JCS authorities note Sport England's request to add a specific NPPF paragraph number.

4.2 *JCS response:* We do not feel it necessary for reasons of soundness to add a specific NPPF paragraph number in this document. The JCS authorities wish to have a future proofed development plan. Accordingly, the JCS authorities have reviewed the whole of the Submission JCS and removed all NPPF paragraph numbers to ensure consistency and cover should the NPPF be revised at a future date.

4.3 Sport England understands the desire to future-proof the document and supports the measures that have been taken to ensure consistency.

5. Shurdington (Inset 3 – Proposed Changes to the Green Belt Boundary)

5.1 Sport England states that the playing field shown in Shurdington should not be identified for development unless and until it can be demonstrated that one of the criteria in paragraph 74 of the NPPF have been met.

~~5.2. As agreed at our October meeting, t~~The JCS authorities clarify that Sport England identified the proposed change to the Green Belt boundary around Shurdington as an example of the wider need (in the opinion of Sport England) to have undertaken assessments in accordance with paragraph 73 of the NPPF before making this change.

5.3. JCS response: The amendment of the Green Belt boundary does not necessarily imply that any of the Shurdington area will be subject to development. Paragraph 5.5.5 of the JCS provides development plan support for the retention of the playing field until its loss can be justified (alongside that already contained in the NPPF). Any development proposal would need to satisfy this policy INF5. It is not necessary for reasons of soundness to revise the Green Belt boundaries for this area.

~~5.3.5.4.~~ At the October meeting, Sport England drew attention to paragraphs 4.6.16 and 4.6.17 which both provide a positive reason for amending the boundary, i.e. "to allow for limited development". In these circumstances, Sport England considers the authorities' proposition of a scenario where none of the land may be developed as largely unrealistic.

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JCS Statement of Cooperation

6.0 Working together in the future

- 6.1 The JCS authorities submitted the JCS on the 20th of November 2014 to the government for examination. The JCS authorities have submitted a plan which they consider to be sound. They do not consider it necessary to make any further changes to the plan with regard to sporting provision at this time.
- 6.2 However, the JCS authorities remain respectful of Sport England's expertise in this area. We also acknowledge our statutory obligations to consult Sport England on any planning applications that involve development on playing fields. We will consider carefully any recommendations the inspector makes on this topic during and after the JCS examination.
- 6.3 The JCS authorities will therefore continue to keep Sport England informed on the progress of our playing pitch/ sport and recreational research. The JCS authorities undertake to consult with Sport England as we finalise playing pitch/ sport and recreational assessments and on an ongoing basis in relation to strategic allocations and other relevant development.

Signed: _____

(for the JCS authorities)

Signed: _____

(for Sport England)

Gloucester, Cheltenham and Tewkesbury Joint Core Strategy

Examination Hearings

April 2015

Statement of Common Ground

Between

Gloucester City Council/Cheltenham Borough Council/Tewkesbury Borough Council

("The Joint Core Strategy Authorities")

And

Stagecoach West

1. Introduction

This Statement has been prepared by Stagecoach West ("Stagecoach") and the Joint Core Strategy Authorities to reflect the current position agreed by all parties with regard to the transport strategy and evidence base within the Joint Core Strategy (JCS).

It also outlines an agreed strategy to ensure that, notwithstanding the policy in the Submitted Plan, the additional opportunities for public transport improvements across the JCS area are identified and fully taken up, both in support of specific proposals in the Strategy, and in response to other requirements that may arise as a result of further evidence.

The Statement is made without prejudice to any detailed matters any party may wish to raise at the Hearings.

2. Background

Stagecoach West is the main commercial bus operator in the JCS area. The Company operates 175 buses within and to the JCS area, based principally at depots in Gloucester (80 buses) and Cheltenham (62 buses). In addition the Company operates from centres at Stroud and Ross-on-Wye, outside the JCS area, but the vast majority of the mileage operated operates to or from the JCS area, reflecting the role the Area plays in a much wider hinterland. Major inter-urban services are operated to Ross and Hereford; Cirencester and Swindon; and Stroud/Dursley. Therefore, the outcomes of the Plan represent a very considerable material influence on the Company's operations. In return the bus services offered by the Company represent a very considerable element of the sustainable transport infrastructure within the JCS area, including the vast majority of the commercial bus mileage operated.

On the routes that Stagecoach operates, patronage has continued to grow significantly, by over 20% over the last 8 years, despite the recent recession and worsening traffic conditions, that tends to reduce the attractiveness and reliability of the Company's services. Stagecoach continues to invest

heavily in the vehicles, infrastructure and staff training to maintain this growth. Since 2010-11, Stagecoach West has invested £11.9m in 68 new buses to serve the JCS Area.

The Company continues to identify with public sector partners, the opportunities to facilitate and further develop bus services that better meet demand on one hand, and to promote bus use as part of a package of more sustainable travel choices.

Stagecoach has made representations concerning, among other things, the soundness of the Plan, and in particular the Duty to Co-operate, the transport evidence base, the appropriateness of the transport strategy and the role of public transport signalled in Draft Policy, and some specific allocations.

Representatives of the JCS Authorities have subsequently met twice with Stagecoach, to review and discuss the representations made on the Plan by Stagecoach. The intent was to reduce as far as possible the distance between the proposed Policies and explanatory Memoranda, and Stagecoach concerns.

Stagecoach has also been invited to two stakeholder workshop meetings in 2014 with Gloucestershire County Council (GCoCo) and the Highways Agency (HA) and its consultants, to consider the transport issues surrounding the strategic allocations, to inform, among other things, the Infrastructure Development Plan.

Stagecoach consider therefore, that through our meetings and discussions on these topics the JCS authorities have essentially discharged their duty to co-operate.

Stagecoach had previously suggested in its duly-made representations, specific alterations to Policy and other aspects of the Plan to make it sound according to the Company's estimation. Following the meetings with the JCS Authorities in October 2014, further specific suggestions were submitted to the JCS Authorities for their consideration as minor changes and these changes have been made in respect of soundness.

The JCS Authorities have made targeted Post-submission changes informed by Stagecoach comments Stagecoach West understands that officers of the JCS Authorities are constrained by the fact that approval across all three Authorities was needed to submit the Plan and that more substantial changes to wording and amendments to policy would require a new approval by Members, causing timetables to slip.

The JCS Authorities and Gloucestershire County Council as the Local Highways Authority continue to progress an updated evidence base to support the submitted Plan. This work will provide much greater clarity on the likely traffic and highways impacts of the proposals in the Plan, and the likely effectiveness of credible mitigation options. This work also aligns with the timescales for a new Local Transport Plan (LTP4), which includes sub-strategies for Tewkesbury and the Central Severn Vale, which together align with the JCS area.

Stagecoach has been recently apprised that Gloucestershire County Council are progressing a new strategic transport model, rebased to 2013, in support of efforts to understand the transport impacts of the proposed JCS Strategy, along with other committed transport schemes. This model, we understand, includes the ability to model mode-share change as a result of changes in modelling

parameters and the provision of specific schemes and their assumed impacts on the relative attractiveness of different modes. Such evidence is, in the view of Stagecoach, a very considerable advance and a great improvement in the evidence base, that ought to assist the JCS authorities, applicants/promoters, GCC, Stagecoach and other transport providers, in working up effective schemes to support the sustainable delivery of the JCS Strategy.

During the plan preparation period, Stagecoach has separately been in dialogue with the promoters of several proposed strategic allocations, alongside the County Council and Development Management Officers, to consider and help formulate appropriate public transport strategies for the promotions, and where necessary, packages of improvements to mitigate impacts. This has led to packages being agreed in principle for several draft allocations.

3. Matters on which Stagecoach and the JCS Authorities are Agreed

The JCS Authorities and Stagecoach recognise the principle of the Plan-led system enshrined in law, as the basis for proper consideration of development proposals.

Stagecoach agrees with the JCS Authorities that the Strategic Objectives of the Plan represent the most appropriate basis on which to plan for the development of the JCS Area.

Stagecoach and the JCS Authorities agree that, in regard to meeting the Strategic Objectives of the Plan, the need for a Sound Plan to be adopted is pressing, to prevent unco-ordinated development, and ensure that the impacts of development across the Plan area are objectively assessed and appropriately mitigated.

Stagecoach and the JCS authorities are agreed that the Plan-led approach offers the only practical and sustainable means of delivering the substantial uplift in housing and employment development mandated by national policy, and supported by the wider evidence base.

Stagecoach and the JCS authorities are agreed that there is sufficient scope at the point applications are being prepared, and progressed through the Development Management process, for the evidence arising from GCC's updated modelling, and our wider specific operational and commercial expertise, to be brought to bear on the proposals. We agree that effective partnership working with GCC and applicants is of the essence to define more fully, and optimise, the sustainable transport packages needed in support of the Plans objectives, and such other site-specific mitigation requirements as become evident through further work, taking advantage as far as possible of the opportunities to take advantage of existing bus services, and enhance them, in support of the Plan's objectives.

Stagecoach and the JCS authorities are agreed that Stagecoach should whenever possible be included at as early a stage as possible in the preparation of planning applications of major sites. This should include involvement in pre-application discussions with LHA officers as transport and urban design principles relating to access, movement and circulation are considered. The identification of the optimum means of providing the most convenient possible access to high quality bus services will be a key focus of this partnership working, having regard to the wider constraints on urban design and development economics, including viability.

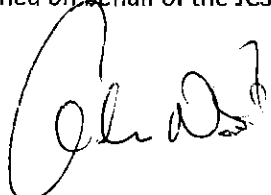
Stagecoach agrees to positively and supportively contribute to these partnership efforts with all stakeholders in the development management system.

Signed:



Rupert Cox
Managing Director
Stagecoach West

Signed on behalf of the JCS Authorities:



CHAIR OF SCS PROGRAMME BOARD

JCS Statement of Cooperation

**Gloucester City Council, Cheltenham Borough Council and Tewkesbury Borough Council
(Collectively the Joint Core Strategy (JCS) authorities)**

Statement of Cooperation with Natural England

1. Introduction

- 1.1 This statement of cooperation acknowledges the representations made by Natural England during the recent JCS Pre-Submission publication period. It sets out items of common ground and disagreement and defines ways in which the JCS authorities and Natural England will continue to work together in the future.
- 1.2 This statement of cooperation acknowledges that Natural England provides expert advice to the Government and local authorities on matters relating to the natural environment and its conservation, management and enhancement.

2. Duty to Co-operate

- 2.1. The Localism Act 2011 imposes upon Local Planning Authorities a 'duty to cooperate' with prescribed and other relevant bodies on strategic planning matters. The Duty requires that a Local Planning Authority engages constructively, actively and on an on-going basis in order to maximise the effectiveness of development plan preparation and strategic matters.
- 2.2. Natural England is a prescribed body as defined in the Planning Practice Guidance and as such the JCS authorities have engaged consistently throughout the plan making process and have worked actively to resolve any outstanding matters prior to examination. Both the JCS authorities and Natural England are in agreement that the authorities have sought Natural England's cooperation and guidance through the plan process and have prepared a plan that responds to Natural England's advice and to the issues affecting the Natural Environment..

3. Policy SD10: Biodiversity and Geodiversity

- 3.1. Natural England's representation to the Pre-Submission JCS set out that Policy SD10 was that it was not compliant with paragraph 118 of the NPPF in relation to the potential impact of development on SSSIs. It was advised that Policy SD10 needs to make clear that SSSIs must be protected from adverse indirect effects arising from development located outside the site boundary. Therefore, Natural England recommended that the policy wording was revised to clarify that development outside SSSIs, that would result in adverse effects on them, will not normally be permitted.
- 3.2. At a meeting held on 17th 2014 October this issue was discussed further and it was agreed that additional wording in the policy and explanatory text could be included in the Submission JCS to provide clarification on this matter. It was suggested point 2. ii. of Policy SD10 and paragraph 4.10.12 of the Delivery text could include additional wording.
- 3.3. **JCS Response:** Additional wording (underlined below) has been added to Policy SD10 (2.ii.) of the Submission JCS to read:
"Conserving and enhancing biodiversity and geodiversity on internationally, nationally and locally designated sites, and other assets of demonstrable value where these

JCS Statement of Cooperation

make a contribution to the wider network. Ensuring that new development both within and outside such sites has no unacceptable adverse impacts.

Additional wording has also been added (underlined below) to paragraph 4.10.12 of the Submission JCS to read:

“The JCS requires developers to avoid harm to biodiversity or, where this is not possible, to incorporate mitigation measures into the design of developments. Developers should also ensure that development outside designated sites will not cause reasonably foreseeable harm to those sites, and if such an effect is likely, should mitigate against it.

3.4. The JCS authorities believe that these additions to Policy SD10 are sufficient to address the concerns highlighted by NE on this issue.

3.5. **Natural England Response:** Natural England advises that the proposed change would meet the advice it gave earlier, to ensure the policy would apply to proposals affecting sites which were proposed outside of the area of a designated site. The policy would then conform to the NPPF. However to ensure clarity on the issue on the hierarchy of environmental impacts (avoid, mitigate, and compensate) Natural England advises an additional change to paragraph 4.10.12 as detailed below.

*“The JCS requires developers to avoid harm to biodiversity or, where this is not possible, to incorporate mitigation measures into the design of developments. Developers should also ensure that development outside designated sites will not cause reasonably foreseeable harm to those sites, and if such an effect is likely **and cannot be avoided**, should mitigate against it.”*

3.6. On the basis of these suggested changes to Policy SD10, Natural England considers that the previous concerns raised have been addressed and that the policy is sound.

4. Habitats Regulations Assessment

4.1. Natural England’s representation to the Pre-Submission JCS sets out a concern that there is insufficient evidence regarding the potential impact of proposed development on the recreational use of the Cotswolds Beechwoods Special Area of Conservation (SAC) contained in the Habitats Regulations Assessment (HRA).

4.2. Natural England were not able to concur with the HRA conclusion that the mitigation provided through the Pre-Submission Draft JCS Policies and available at the project level will address the potential for adverse effects on the Cotswolds Beechwoods SAC as a result of increased recreational activity. It is felt that further detail is needed regarding the likely effects and the potential mitigation measures that could be implemented before Natural England could support this HRA conclusion.

4.3. Natural England considered that any significant effects of the JCS on the SAC due to increased recreation are capable of being addressed through mitigation. Natural England therefore broadly concurred with the HRA suggestion that, although further discussions, survey and implementation of actions in regard to the management of the SAC are needed, the mechanisms are in place at a strategic policy level to enable mitigation to be delivered.

JCS Statement of Cooperation

- 4.4. At a meeting held on 17th October 2014 this issue was discussed in greater detail to determine what additional information Natural England felt would be necessary in order to gain a more detailed understanding of the recreational pressures on the SAC. Natural England stated that this could be obtained through visitor surveys and discussions with key stakeholders. It was felt that if this evidence can be sourced and mitigation measures established then the HRA could include a more detailed section regarding the Beechwoods SAC. Natural England therefore recommended that a visitor survey is undertaken to understand the recreational use of the SAC.
- 4.5. Further to this meeting the JCS officers identified that, as part of the supporting evidence for a planning application (12/01256/FUL) at Perrybrook/North Brockworth (JCS Strategic Allocation A4), an Appropriate Assessment of the potential impacts of the development of the Cotswolds Beechwoods SAC was undertaken. This work was undertaken at the request of Natural England and includes an assessment of the potential significant effects of development on the SAC due to increased recreational pressure and is supported by a visitor survey and discussions with Natural England. JCS officers believe that this study could form sufficient evidence to inform the HRA. However, Natural England felt this to be unsuitable as the study was too tailored towards the impacts of the application site and, although the methodology of the study appeared to be sound, it was not wide enough in scope in its coverage of the area of the SAC considered. Therefore an additional study would be required.
- 4.6. **JCS Response:** Additional wording (underlined below) has been added to paragraph 5.4.7 of the Explanation text for Policy INF4: Green Infrastructure to read:
- "It is recognised that the growth to be delivered through the JCS may increase demands on green spaces through increased recreational use. This will require careful management, particularly for ecologically sensitive sites. This could include requiring developer contributions for such provision (for example, a contribution towards the management of the Cotswolds Beechwoods Special Area of Conservation). The JCS authorities will work together with key stakeholders, such as Natural England and the Environment Agency, to develop management and mitigation packages for important green and ecological networks and to discuss how future development can contribute to this."*
- 4.7. This additional wording is to recognise that growth may bring additional recreational pressure on natural sites and that the JCS authorities are committed to working with stakeholders such as Natural England to develop management plans for these areas. This includes exploring how new development can contribute to measures to mitigate against adverse impacts.
- 4.8. In addition, Natural England are preparing a Site Improvement Plan (SIP) for the SAC, which has also been referenced in the Habitats Regulations Assessment Addendum. The SIP will be used to better understand the issues and pressures affecting the SAC and enable the development of a strategy for its future management, including responsible partners and potential funding sources. One of the priority issues set out in the SIP regards public access and disturbance. On this issue the SIP states that public use of the SAC has grown considerably over recent years, particularly mountain biking which uses areas of woodland far beyond the limited network of bridleways. As such, the SIP presents an action to 'Reduce

JCS Statement of Cooperation

impact of recreational pressure in particular mountain biking by implementing an access strategy'. To achieve this Natural England hopes to lead and advise surrounding local authorities and others to implement this.

- 4.9. The JCS authorities, following discussions with Natural England, have also prepared an addendum to the Habitats Regulations Assessment to provide further detail on the potential recreational impact of the development proposed through the JCS. The addendum contains an analysis of the Appropriate Assessment of the potential impacts of development on the Cotswolds Beechwoods SAC from the Perrybrook application. Natural England and the JCS authorities believe this evidence indicates the nature of the pressures on the SAC and could be used to inform further work to fully assess the potential impacts and indicate the scope, location and delivery mechanisms for mitigation. The HRA addendum includes conclusions on where visitors to the SAC are travelling from and the type of activities they are undertaking. Natural England and the JCS authorities feel that the HRA addendum provides further evidence and detail regarding the potential recreational impact of development and the policy framework for requiring appropriate mitigation.
- 4.10. **Natural England Response:** Natural England notes the work done to assess visitor impacts on the Cotswold Commons and Beachwood's SAC from the planning proposal at the strategic site allocation A4 North Brockworth. We welcome this study but continue to advise that the full impacts of the proposals in the JCS, and other neighbouring development plans, should be looked into further on a Gloucestershire-wide basis and appropriate mitigation measures devised and delivered.
- 4.11. Natural England does believe that it is possible to mitigate the recreational pressure that may result from the proposals based on our experience so far at the Cotswold Beechwood's, and other sites around the country.
- 4.12. Natural England notes the policies in the JCS which endeavour to provide the necessary policy framework for the protection and increase in Green infrastructure provision within and outside development sites and additional policy to require developer contributions to offset impacts.
- 4.13. In regards to proposed changes to the explanatory text of Policy INF4, Natural England welcomes this additional wording to provide further detail on recreational pressure and the commitment of the JCS authorities to work further on these issues. However, Natural England suggests additional wording to highlight the role of neighbouring local authorities in this further work. Therefore Natural England advises an additional change at paragraph 5.4.7 as detailed below.
- "The JCS authorities will work together with key stakeholders, such as Natural England and the Environment Agency, and Local Authorities, to develop management and mitigation packages for important green and ecological networks and to discuss how future development can contribute to this."*
- 4.14. The complementary changes proposed here (the mitigation of indirect effects on sites [policy changes to SD10] and using the North Brockworth data as a guide to understanding the impacts on the Cotswold Beechwoods SAC rather than accepting the data as a full assessment of impacts suitable to develop detailed mitigation), changes Natural England's

JCS Statement of Cooperation

advice on the overall soundness of the JCS with respect to recreational pressure on the Cotswold Beechwoods SAC. Together these two proposed changes mean the necessary policy framework and evidence to mitigate impacts on the SAC are appropriately developed, and understood. With respect to indirect impacts on the SAC due to recreational pressure we consider the plan sound if these changes are accepted.

5. Working together in the future

- 5.1. The JCS authorities submitted the JCS on the 20th of November 2014 to the government for examination. Following the publication of the Pre-Submission JCS the JCS authorities made amendments to the plan to address outstanding concerns of Natural England. The JCS authorities have submitted a plan which they consider to be sound and it is not considered necessary to make any further changes to the plan. However, an addendum to HRA on the issue of recreational pressure on the Cotswolds Beechwoods SAC has been prepared post-submission to provide further detail. Natural England have additionally suggested some minor wording changes detailed above to provide clarity to the plan.
- 5.2. The JCS authorities remain respectful of Natural England's expertise in these areas and remain committed to work together on issues regarding the natural environment. In particular it is recognised that it will be important to continue to work together on the conservation and management of ecologically sensitive sites, including the Cotswolds Beechwoods SAC. This includes developing management plans and mitigation packages and working with developers to discuss how future development can contribute to this. It is also acknowledged that there is a statutory duty to consult Natural England on certain planning applications for example applications affecting nationally and internationally designated sites
- 5.3. Each of the JCS authorities will also be preparing individual district level plans which will identify non-strategic development sites and set out locally specific policy guidance. The JCS authorities are committed to continued working with Natural England on the development of these plans.

Signed:



(for the JCS authorities)

Signed: _



(for Natural England)

County Planning Officers Group

November 12th 2019 Cotswold

Attendees: Mark Russell, Nigel Gibbons, Matt Barker, James Brain, David Ingleby, Rob Niblett		
No.	Notes	Action
1	<p>Notes of previous meeting- agreed see below in main items and:</p> <ul style="list-style-type: none"> • GCC's approach to CIL / S106 e.g. Tewks appeal and Pupil ratios; GCC is preparing an update to its Local Developer Guide to provide additional clarification on its use of S106 • JCS will likely review their CIL alongside JCS2 	
2	<p>LHNA: thread running through the document not clear. It is not clear how document will support the revision of housing policies. Threshold of 30% is a sticking point. Aspirational need - is this impacting true housing need?</p> <p>ACTION: Request Exec Summary.</p>	
3	<p>Economic Needs Assessment: Meeting on Friday - Inception meeting.</p>	
4	<p>JCS Transport Project Group: Transport strategy being drafted to inform site selection process. ITP preparing transport principles on behalf of JCS. Work ongoing to identify sustainable locations for future site allocations.</p>	
5	<p>GCC Transport update (Rail and LTP)</p> <ul style="list-style-type: none"> • GCC Rail Assessment modelling working has started. Meeting with the LEP to discuss modelling outputs (December 2019). Final report published end of 2019. ACTION: Rob to send invite around the group. • LTP update - 20th December seeking approval for consultation and the adoption following review of consultation. <p>GCC bid (Technology neutral bid) into the LEP to build a rapid transport link - racecourse keen to be part of the solution.</p>	
6	<p>LUC work: Final draft has been present to JCS authorities, complete end of 2019. Next step what to do with this information. Most sites are constrained. Viability being conducted by Simon Drummond Hay.</p>	
7	<p>GTAA: A refresh update Glos-wide GTAA was discussed. Discussions focussed on:</p> <ul style="list-style-type: none"> • What is the scale of the update? And • Is there broad support to update? <p>Availability of sites is constrained and not coming forward through. More affordable temporary pitches required.</p> <p>OUTCOME: support in principle but scope of work and issues that need resolving needs further consider.</p>	
8	<p>Duty to Cooperate:</p>	

County Planning Officers Group

November 12th 2019 Cotswold

	<ul style="list-style-type: none"> a. Garden Town: Mitton in SWDP will contribute 500 homes to Tewks. b. FOD: Transportation through Monmouthshire focus of conversations. New bridges. c. Gloucester - GTAA letter 	
9	<p>LP updates:</p> <p>Gloucester: Reg 19 consultation on Gloucester Plan (closes Friday 20th Nov). Submission in March. Examination in Summer. Adopt by 2020.</p> <p>Tewks: Reg 19 consultation closes on Monday. Submit in new year.</p> <p>JCS - Draft Reg 18 consultation in 2020 (after consultations);</p> <p>Stroud: Draft Plan agreed. Will now include Hardwick to meet needs; new renewable energy policy (papers written). Large strategic sites - CAM and Sharpness. Consultation closes 6 Jan 2020. Autumn 2020 Reg 19 consultation; Examination Spring 2021; Adoption late 2021 / early 2022.</p> <p>Natural England question scope of HRA and Beechwood work - comments received. Buffers being looked at and mitigation strategy being worked up.</p> <p>Forest: I&O completed in Oct 2019. Comments suggested a new settlement to the east of Gloucester, but mostly general comment.</p> <p>GCC: Minerals Plan - main mods consultation in 2020.</p> <p>CDC: About to embark on the local plan review process</p>	
10	<p>CIL</p> <ul style="list-style-type: none"> a. Stroud - updated CIL last March. b. JCS - will likely review their CIL c. CDC investigating S106 monitoring fees. 	
11	<p>AOB</p> <p>Glover Review: All invited to 24 January 2020 workshop meeting to discuss Cotswolds National Park. Suggestion of a Forest National Forest / Biosphere in the Forest of Dean.</p> <p>Missing Link A417 – general discussion</p> <p>AONB new CEO (Andy Parsons) – for information</p> <p>Self Build Register: Gloucester asked how are authorities demonstrating active delivery of serviced plots. Most LPAs have monitored to single windfall build plots.</p>	

County Planning Officers Group

November 12th 2019 Cotswold

County Planning Officers Group

Friday 21st February 2020 – Gloucester City Council

Attendees

Adam Gooch (Chair) – Gloucester City Council – Planning Policy
 Mark Russell – Stroud District Council – Planning Policy
 Nigel Gibbons – Forest of Dean District Council – Planning Policy
 Matt Barker – Tewkesbury Borough Council – Planning Policy
 James Brain – Cotswold District Council – Planning Policy
 Rob Niblett – Gloucestershire County Council – Strategic Planning
 Robin Drake – Gloucestershire County Council – Waste and Minerals Planning
 Sophie Thomas – Gloucestershire County Council – Monitoring & Negotiating Developer Contributions
 Tina McCausland - Monitoring & Negotiating Developer Contributions

Apologies

John Rowley – Cheltenham Borough Council – Planning Policy

No.	Notes	Action
1	Welcome and introductions	
2	Notes/actions from last meeting No actions. Notes agreed as a true record of discussions.	
3	<p>Gloucestershire County Developer Guide / Education contributions</p> <p>ST circulated a draft Interim Position Statement and covering letter regarding S106 developer contributions towards strategic infrastructure. It has been signed off by County Council senior directors and will be circulated to district senior directors next week. This represents a ‘pre-consultation’ and a meeting for discussion will be set up during March. This will then be followed by public consultation in April 2020.</p> <p>Comments/questions from the group:</p> <ul style="list-style-type: none"> ● It is important for the development contributions team to engage with other County Council departments to ensure consistency in approach (for example the property team that is promoting development sites with the county); ● It is difficult to understand the County Council’s strategic infrastructure priorities and it would be helpful if this could be addressed; ● The way in which the primary school ‘hotspots’ have been identified at Appendix 1 of the note has implications for the planning applications and planning strategy. For example, a school may be at or beyond capacity but there could be an opportunity to accommodate school place needs within the wider ‘education planning unit’. Furthermore, capacity (or lack of) could be a key influence on rural housing allocations. ● Appendix 1 – what timescale does this relate to? ● When would the County Council look to adopt the Developer Guide? 	ST

County Planning Officers Group

Friday 21st February 2020 – Gloucester City Council

4	<p>Evidence base</p> <p>(a) <u>Gloucestershire Growth Option Study (LUC): Lead - JCS</u> Final draft report received 17/02/2020 and officers now need to review and provide final comments. Responses templates provided by LUC. Hannah Millman to arrange Steering Group meeting. Following on from this, the authorities will need to work together its interpretation for plan-making. Likely publication March/April 2020. Action: Review and sign off study.</p> <p>(b) <u>County Economic Needs Assessment (DLP) / Employment Land Review: Lead - SDC</u> DLP commissioned to undertake the Economic Needs Assessment, inception meeting taken place and progressing. Final report expected March 2020 and officers for each district will need to provide feedback. The Employment Land Review (ELR) is the next step and each local authority will need commission its own study. SDC will be moving to this stage quickly to support the Local Plan Review. Actions: Review and feedback on draft Economic Needs Assessment. Consider approach to commissioning ELR.</p> <p>(c) <u>County Local Housing Needs Assessment: Lead - FODDC</u> Study nearing completion, however there are some big issues that still need to be addressed by ORS. It may be necessary to have a further steering group meeting to finalise.</p> <p>(d) <u>County Gypsy/Traveller Accommodation Assessment: Lead - FODDC</u> All LAs acknowledge the need to update a new assessment of traveller accommodation needs. Keith Chaplin from FODDC to lead. Draft specification of work to be circulated to comment over the next few weeks for review and comment. Actions: Review and comment specification of work once circulated. Each LA to provide Keith Chaplin with Project Group participant from planning and housing.</p> <p>(e) <u>County Gypsy/Traveller Site Identification Study</u> All LAs acknowledge the need to undertake a piece of work to identify deliverable sites for the traveller community. Adam Gooch from GCiC to lead. Draft specification in preparation and will be circulated for review and comments over the next few weeks. Actions: Review and comment specification of work once circulated. Each LA to provide Adam Gooch with Project Group participant from planning and housing.</p> <p>(f) <u>JCS Transport Strategy</u> Brief circulated to project group for review comments. Being considering at meeting of JCS Transport Group 26/02/2020, followed by procurement. The consultant will likely be appointed early May.</p> <p>(g) <u>Strategic Flood Risk Assessment</u> The Environment Agency has confirmed that a new Strategic Flood Risk Assessment (SFRA) Level 1 will not be necessary to support plan reviews. Instead it will be necessary to review the evidence that each</p>	<p>ALL (exc. CDC)</p> <p>ALL</p> <p>FODDC/ ALL</p> <p>GCiC / ALL</p>
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County Planning Officers Group

Friday 21st February 2020 – Gloucester City Council

	<p>local authority holds and make an informed decision on what should be reviewed.</p> <p>Action: AG to request letter from the EA confirming position.</p>	AG
5	<p>Gloucestershire Local Transport Plan consultation</p> <p>The County Council is currently consulting on the Draft Local Transport Plan up to 2041. The deadline for responding is 26th March 2020.</p> <p>Comments/questions:</p> <ul style="list-style-type: none"> • Cotswold – concerns that the current draft plan doesn't adequately demonstrate implementation Action: Requests that the County Council undertake an assessment against the PAS legal compliance/soundness checklist. • County Council confirmed the Rail Implementation Strategy should be finished by W/E 27th March. Will be circulated for final feedback. Action: Question as to whether the Strategy will be adopted by the County Council – to be confirmed. 	<p>LTP Team</p> <p>RN</p>
6	<p>Statement of Common Ground / Duty to Cooperate</p> <ul style="list-style-type: none"> • Acknowledgement that the Statement of Common Ground has stalled and there is a need to get something in place asap, certainly to support the Gloucester City Plan and Tewkesbury Borough Plan submissions to the Planning Inspectorate. • Commitment from all to set aside time to get this in place; preference to get together for a few days, thrash out the issues and write there and then. 	
7	<p>Local Plan Updates</p> <ul style="list-style-type: none"> • Gloucester: JCS Review progressing, with the aim of the next Reg 18 Stage of consultation to be undertaken Autumn 2020. The City Plan Pre-Submission consultation ended 14th February 2020; officers are now reviewing representations with the intention of submitting to the Planning Inspectorate in May/June 2020. • Cheltenham: Post meeting update: Officers are now in receipt of the Cheltenham Plan Inspector's fact check version of her final report. We are aiming to take the final version of the report to Council on the 22 April for adoption. JCS update as above. • Tewkesbury: Tewkesbury Borough Plan Pre-Submission consultation closed 18th November 2019 and officers are currently reviewing representations with the aim of submitting to the Planning Inspectorate in March 2020. JCS update as above. • Stroud: Consultation on the Draft Stroud Local Plan Review closed 22 January 2020. Over 1,000 responses received. Aiming to submit November 2020. • Cotswold: Currently no authority to update the Local Plan. Currently considering three potential options (1) Do nothing (2) Addendum to current Local Plan up to 2031 (3) Extend to 2041. 	

County Planning Officers Group

Friday 21st February 2020 – Gloucester City Council

	<ul style="list-style-type: none"> • Forest of Dean: Progressing review, aiming to consult on Preferred Options document middle of 2020, followed by a Draft Plan early 2021. • Gloucestershire: Minerals Local Plan – following examination in the Summer of 2019 and consultation on Main Modifications in Autumn 2019, the County Council is now in receipt of the final report and seek adoption at the beginning of March 2020. Waste Local Plan – this will be the focus following adoption of the Minerals Local Plan. Programme to the confirmed but aiming for consultation towards the end of 2020. 	
8	<p>CIL updates</p> <ul style="list-style-type: none"> • JCS: The JCS authorities are now taking forward a review of the current CIL. Key milestones are: Draft Charging Schedule consultation – October/November 2020; Submission – January 2021. • Stroud: At the point of CIL adoption in 2017 the authority committed to the three-year review; this will be April 2020. Work already commenced, intending to submit CIL alongside Stroud Local Plan Review in the autumn. • Cotswold: No update, CIL implemented. • Forest of Dean: Currently undertaking valuation works to understand the feasibility of CIL for the Forest of Dean. 	
9	<p>AOB</p> <ul style="list-style-type: none"> • Planning White Paper – big implications and one to keep an eye on. • Reversing Your Railway – funding opportunities through DfT to reopen old railway lines. RN to circulate guidance. 	RN

County Planning Officers Group

Tuesday 19th May – Via Microsoft Teams

Attendees

Adam Gooch (Chair) – Gloucester City Council – Planning Policy
 Mark Russell – Stroud District Council – Planning Policy
 Nigel Gibbons – Forest of Dean District Council – Planning Policy
 Matt Barker – Tewkesbury Borough Council – Planning Policy
 James Brain – Cotswold District Council – Planning Policy
 Rob Niblett – Gloucestershire County Council – Strategic Planning
 John Rowley – Cheltenham Borough Council – Planning Policy
 Sophie Thomas – Gloucestershire County Council – Monitoring & Negotiating Developer Contributions
 Tina McCausland - Development Contributions Investment Officer
 David Oakhill – Cheltenham Borough Council – Head of Planning
 Keith Chaplin – Forest of Dean District Council – Housing Strategy & Enabling Officer

Apologies

Robin Drake – Gloucestershire County Council – Waste and Minerals Planning

No.	Notes	Action
1	Welcome and introductions	
2	<p>Notes/actions from last meeting</p> <p>ST took comments back on local developer guide ALL commented on growth options and is now signed off Cotswold outstanding comments on economic need JB to circulate the PAS legal compliance/soundness checklist</p> <p>Notes agreed as a true record of discussions.</p>	JB
3	<p>Statement of Common Ground</p> <p>Update from DO. John Baker has been handing over his most recent work. DO will share initial draft in May, June to senior officers, August members' session dependent on lockdown. September consultation of some sort. Adoption by end of 2020. DO will circulate timetable via AG.</p> <p>Discussion about how SoCG needs to have appendix which refers directly to each authority.</p> <p>Discussion around what consultation will be.</p>	DO
4	<p>Local Developer Guide</p> <p>TM gave update on LDG and explained purpose of the refresh.</p> <ul style="list-style-type: none"> • The refresh LDG previously went out for pre-consultation with the districts. A table of summary of the changes made to the LDG following comments by the LPAs. • The refresh LDG is currently out for a 4 week targeted public 	JB

County Planning Officers Group

Tuesday 19th May – Via Microsoft Teams

	<p>consultation until the end of May 2020 and GCC is now receiving and analysing these responses.</p> <ul style="list-style-type: none"> • The reason for the refresh of the LDG now is because GCC are making sure that they have the most up to date policies and publications in the LDG for all relevant sections from relevant teams. For example with regards to education they need to have the most up to date Pupil Product Ratios (PPRs) in the guide. These PPRs are already in operation and are publically available in the PPR report which is on the Gloucestershire County Council website and in the GCC community infrastructure consultation responses for education. The LDG needs to be updated to reflect this. • Following sign off GCC is working towards adoption of the LDG by the end of June 2020 • TM posed the idea of a working group to discuss the future co-authored LDG (spring 2021). AG suggested around October 2020 for the working group and everyone was happy with this. TM will get back with suggestions of specific dates. TM also posed the idea of Gilian MacInnes as a facilitator and said she may be able to organise this for Gilian to facilitate and everyone seemed keen. TM will get back to everyone on this. Also agreed that we would discuss a little more re the future co-authored LDG at the next CPOG meeting. • The idea was posed that the districts could input into the co-authored LDG providing their own responses but FOD had previously suggested a chapter per district. However all were keen to also do a working group around October. <p>JB has written response for CDC and is happy to share with other districts</p>	TM
5	<p>Gloucestershire Community Rail Partnership</p> <p>RN explained that GCC would be the lead authority. National train companies aren't able to commit funding at this point. They would like representatives from each district.</p> <p>All to determine a contact for their authority and send to RN</p>	ALL
6	<p>MHCLG letter(s) re. 5 year supply etc</p> <p>JB has sent around the latest version of the letter. All agreed this version.</p> <p>All to send confirmation to JB that the correct member has been identified on the letter by 22 May</p>	ALL
7	<p>Evidence</p> <ol style="list-style-type: none"> a. Growth Options Study – HM talked about the need for member engagement. Agreed to have a publish date of 26 June b. Gloucestershire Economic Needs Assessment / Employment Land Review – MR relayed consultants options regarding impact of Covid. One option is to have a chapter on Covid which discusses risks. Alternative is to publish report and have a follow up piece of work which can investigate impacts in more detail. All agreed to the second 	

County Planning Officers Group

Tuesday 19th May – Via Microsoft Teams

	<p>option with a health warning included in the initial report.</p> <p>c. Gloucestershire Local Housing Needs Assessment – Had a few comments on latest draft which have been forwarded to ORS to respond.</p> <p>d. Gypsy & Traveller Accommodation Assessment / Site identification – KC has circulated brief for comments and draft participation agreement. Aim is for work to start in September but timeline is tight. All to get back to AG on site identification work 29th May</p> <p>e. JCS Transport Study – MB gave an update on the brief. Will soon be in a position to go out to tender.</p> <p>f. Climate Change / Renewables Study – AG raised the idea of some joint work on climate change and renewables.</p>	ALL
8	<p>Local Plan Updates</p> <p>JCS – Looking at how to use the LUC work with FoD and Stroud. Working on strategic growth options. Work ongoing with reviewing and updating policies. Still aiming for reg 18 consultation at the end of this year.</p> <p>Cheltenham – Ready to adopt but waiting for easing in lockdown to be able to make a Council decision</p> <p>Cotswolds – Local Plan review will be going to virtual council meeting. Recommending a focused update.</p> <p>Stroud – Covid has delayed timetable. Looking at delaying submission of plan until March 2021.</p> <p>Tewkesbury – Plan has now been submitted and waiting to hear back from PINs.</p> <p>Country Council – Minerals Plan has been adopted. Looking at consolidate Waste policies into one document. Looking at reg 18 document in Autumn.</p> <p>Gloucester – Timeline has been affected by Covid. Looking to submit in July.</p>	
9	<p>CIL updates</p> <p>AG will get an update from PH</p>	AG
10	<p>AOB</p> <p>MR passed on request from Conrad for a response to e-mail regarding the Beechwoods SAC</p> <p>JB asked if anyone knew of anyone he could team up with regarding high street reopenings.</p> <p>RN to inquire about a contact from Highways</p>	ALL RN